

## School accountability reform.

Consultation response from the National Governance Association, 25 April 2025

### Introduction

The National Governance Association (NGA) is the sector body for school and trust governance in England, representing the interests of school governors, trustees, and governance professionals across all types of schools and school structures. As the membership organisation for school governance, we support and champion good governance as the primary and first line of responsive, contextually sensitive accountability.

NGA supports an independent inspection regime and values the role both Ofsted and the DfE play in providing a vital strand of external accountability for schools, complementing the internal accountability provided by governing boards.

NGA has welcomed the opportunity to actively engage directly with both Ofsted and the DfE in the review of sector accountability and inspection. However, we maintain the position that an independent review of the whole accountability system is needed, including how the roles of government, Ofsted and governance fit together, and how accountability for individual schools and the groups which run them connect and complement one another.

Our consultation response draws on extensive engagement with our members across the country, reflecting the diverse perspectives and experiences of those serving in governance roles in maintained schools, academies, and multi-academy trusts. We aim to be open-minded yet pragmatic, focusing on providing clear and precise feedback to the government on how the proposals can be improved to work most effectively and most supportively for schools, trusts and stakeholders. NGA continues to be an open minded, collaborative organisation that seeks to work with, and not against. The DfE, Ofsted and sector partners.

### Executive Summary

The National Governance Association (NGA) broadly supports the principles outlined in the Department for Education's school accountability consultation, most of which are hard to argue against. However, we do raise some important considerations about implementation and potential unintended consequences. Key points from our response include:

1. Governance-focused principle needed: We recommend introducing a governance-focused principle to recognise the internal, responsive accountability that governance provides, ensuring external accountability mechanisms support and reinforce this role rather than duplicating or undermining it.
2. School profiles approach: We support the principles of school profiles to provide a more holistic view of performance, but we urge caution about what additional information

should be published and in what form, while emphasising the need for proper contextualisation of data.

3. Structural intervention: We support the shift in policy that prioritises collaboration and support over immediate compulsory structural change in most cases, while acknowledging structural change remains necessary where governance bodies are unable to prevent a school requiring special measures.
4. RISE intervention: We strongly agree with the approach to RISE intervention as it aligns with the shift towards capacity building rather than automatic structural change, allowing schools a defined period to improve under targeted support.
5. Attainment-based intervention: We disagree with the proposal for RISE teams to engage with schools based solely on concerning levels of pupil attainment, citing data limitations, and the potential uncertainty and complexity this could create within the accountability system.
6. Workload considerations: We highlight concerns about the potential for increased administrative burdens from new accountability measures, particularly from the introduction of RISE teams coupled with new Ofsted monitoring expectations.

## Chapter 1

**Question 11: Do you agree that these are useful principles for delivering improvements to school accountability? (Options: Strongly agree, agree, neither agree nor/disagree, disagree, strongly disagree)**

**Question 12: Are there any other principles that we should consider? (Free text 250 words)**

Agree.

- NGA welcomes the proposed principles, and we would agree that they will contribute to a strong foundation for a fairer, more transparent and improvement focused school accountability system. We particularly appreciate the emphasis on proportionality, as well as the recognition that accountability should drive improvement rather than simply identify underperformance.
- We have long supported a less punitive accountability model which combines early intervention and contextually appropriate long-term support, rather than always resorting to the blunt tool of structural change.
- Nevertheless, principles of school accountability must not fail to recognize the role of governance, which provides continuous, contextually informed scrutiny as the primary form of front-line accountability to ensure schools improve over time.
- External accountability mechanisms should complement this work, rather than duplicating or undermining it. We would therefore recommend a governance-focused principle be

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introduced to recognize the internal accountability governance provides, and to ensure that external accountability mechanisms support and reinforce the role of governance as part of a cohesive system – rather than the other way around. This could, for example, involve drawing on the scrutiny conducted by boards as a key source of evidence, and ensuring any improvement plans equip boards to effectively hold leaders to account for delivering those plans.

- The significance of governance means that those involved in external accountability must have a detailed understanding of governance and appreciate its distinct role within different structures. NGA are willing to support the Department in ensuring that the new RISE teams receive appropriate training on these issues.

## Chapter 2

**Question 13:** Do you agree a school profile should be the place users can see the most recent performance information, where it is available? (Options: Strongly agree, agree, neither agree nor/disagree, disagree, strongly disagree)

**Question 14:** Is there other information published by the Department that you would like to see in a school profile in future? This could include, for example, relevant data on pupil characteristics, workforce or finance. (Free text 250 words)

**Question 15:** Are there other pieces of information that you might expect or want to routinely see in a school profile? This could include, for example, information from schools themselves such as its ethos or the breadth of, and pupil engagement in, curriculum enrichment activities. (Free text 250 words)

**Question 16:** Do you have any further comments on our proposal for a new school profile service operated by the Department? (Free text 250 words)

### Agree

- NGA support the principle behind school profiles as we see the merits of publishing a broader range of data that provides a more holistic view of a school's performance than the "snapshot" perspective of the most recent Ofsted inspection.
- However, significant care will be needed in deciding what additional information should be published, and in what form. This will likely only be possible if the profiles are constructed in close collaboration with the sector.
- For example, information on pupil characteristics and contextualised pupil progress could help parents and other stakeholders more fully understand the school. Doing this effectively could provide a clearer context for school performance, and highlight how effectively schools support diverse pupil groups, including those from disadvantaged backgrounds or with additional needs.

- There is a significant risk that, without proper contextualisation, data could be misinterpreted by parents, potentially leading to school choices that exacerbate social segregation, with schools serving a higher proportion of disadvantaged pupils being seen as less desirable. There is also an outstanding question of what a suitable measure of contextualised pupil progress would look like. Any quantitative measure needs to have a sufficient sample size, and ideally to be based over a rolling three-year period so it is not overly dependent on any potentially anomalous cohort.
- The question raises the issue of workforce and financial data. Again, certain measures such as teacher qualifications, staff turnover, budgetary position, executive pay, and relevant pay gaps could all provide valuable insights into how schools are resourced to meet their students' needs. However, there are again a series of risks which might outweigh the benefits, from the dangers of small sample sizes to the issue of quantitative measures being published without the necessary context and so obscuring more than they reveal.
- Looking beyond attainment and resources, there is also the potential for qualitative information which could provide a broader picture of a school. Examples include information on extracurricular activities, mental health support services and parental engagement structures. Quotes from pupils, parents and other key stakeholders could supplement this information. Again, the Department should be mindful of unintended consequences – schools feeling pressured to devote significant time and resource to what could be seen as “marketing” or “branding” measures to make their school look as good as possible, rather than focusing on delivering for pupils.
- In summary therefore, we think the principle of school profiles as a way of providing a broader perspective of a school, and reducing the weight (and therefore “high stakes”) of an Ofsted inspection is important, and worth further exploration. However, we do see a number of potentially significant pitfalls, as described above. We therefore hope that this consultation is the start of a conversation with the sector about how school profiles could be delivered effectively.

## Chapter 3

**Question 17: Do you agree that a school which is judged by Ofsted to require special measures should normally be subject to structural intervention? (Options: Strongly agree; agree; neither agree nor disagree; disagree; strongly disagree) Please explain your answer (Free text 250 words)**

Agree

- The NGA is pleased to see the shift in policy that prioritises collaboration and support over immediate compulsory structural change in most cases. However, structural change does still remain necessary where the responsible body, whether the LA or trust, has proven unable to prevent the school requiring special measures, with potentially devastating consequences for the life chances of its pupils.

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- As an organisation we have long endorsed the benefits of being in a group of schools, most notably, yet not exclusively, through MATs. Our recent [report](#) demonstrates the growing maturity of MATs in governance, financial management and capacity building, all of which can be fundamental in addressing the challenges faced by schools requiring special measures. In contrast, many local authorities have seen a decline in their capacity to support schools due to budget cuts and the increasing number of academies. This landscape has, of course, hindered the ability of some LAs to implement effective interventions for struggling schools. At the same time, the nature of the MAT model means there will be a number of trusts potentially able to support a struggling school, whereas there is only one single LA for each school. We therefore support the principle that the worst performing schools should receive structural change and within the current context and the logistics of the sector, it makes sense this is usually through a move to becoming part of an effective, quality MAT.
- However, we would urge the DfE to conduct further evidence gathering on what constitutes an effective, quality MAT, and not simply rely on well-rehearsed yet often ill evidenced central policy statements that have been carried over from the previous government.

**Question 18. Do you agree that, until September 2026, while we build improvement capacity, schools that require significant improvement should normally be subject to structural intervention? (Options: Strongly agree; agree; neither agree nor/disagree; disagree; strongly disagree) Please explain your answer (Free text 250 words)**

Agree

- While we support the direction of travel towards a more nuanced and supportive system, we also recognise the serious consequences of allowing struggling schools to simply stand still without well-informed and identified school improvement support or structural intervention. For a particular child, a two or three year wait for school improvement support is a large proportion of their time at the school. While the existing model is not without its faults, structural intervention, particularly in the form of moving to a trust/moving trusts, has delivered clear benefits to many schools. As such, while improvement capacity is developed, structural change remains preferable to inaction.
- However, this should not be confused with a school joining any MAT available for the sake of adhering to standard process. As suggested above, sometimes this scenario will have occurred as the school has struggled under the oversight of being in an existing trust, and being moved to a MAT can therefore not been viewed as a silver bullet. NGA particularly advocates for building the right trusts in the right places.
- The trust system relies on schools being part of the right groupings to best raise standards and support each other. Context is king when forming trusts, but our experience suggests three fundamental principles should be followed: trusts need to be robust enough to realise the 'trust dividend' (the benefits of the trust model); they need to have a geographical

coherence so that individual schools can be supported, not left isolated; and to reach outwards to ensure the buy-in of local stakeholders

- The Department must ensure that Regions Group remains able to identify the best partnerships for individual schools and make contextualised decisions on when immediate structural change is preferable, and when waiting for school improvement support may be a better option. As the Department will be aware, it is not always possible to quickly find an effective trust partner for an underperforming school.
- Like all schools, academies are struggling to direct adequate resources to where they are needed. The funding situation for schools and the wider public sector has been well documented, but that does not make it any less acute. Accountability reforms are great in principle, but this has to be serviced by an appropriate amount of funding. On top of budgets, there are also challenges for trusts in finding and keeping the right people, with issues around recruitment, retention and workload for both employees and governance volunteers

**Question 19. Do you agree that from September 2026, in schools that require significant improvement, targeted RISE intervention should be deployed to give the school targeted support to improve, before moving to structural intervention if necessary?**

**(Options: Strongly agree; agree; neither agree nor/disagree; disagree; strongly disagree) 30**  
**Please explain your answer (Free text 250 words)**

Strongly agree

- As already stated, NGA supports the move to a more nuanced and supportive model of school improvement. The phased approach to RISE intervention aligns with the shift towards capacity building rather than automatic structural change. Allowing schools a defined period to improve under targeted RISE support with clear criteria for when structural intervention would be triggered ensures that interventions are proportional and contextually appropriate, while going some way to reduce the stakes of a single Ofsted visit.
- Furthermore, despite the well documented success of MATs in delivering school improvement for sponsored academies, the time it often takes for a school to academize and join a MAT cannot be understated, and these bureaucratic processes can delay the support struggling schools urgently need. There have been cases where schools have been issued academy orders but have found themselves stuck in a 'bureaucratic limbo', unable to access the support of a MAT. During this phase, school improvement efforts have been delayed. This is where RISE teams could be crucial, since their interventions offer the potential for faster, more effective improvement by bypassing the administrative burdens of structural change – whether academisation or rebrokering. By deploying RISE intervention in schools requiring significant improvement, the focus can be placed on



addressing specific issues with agility, enabling quicker turnaround times for improving standards and outcomes.

**Question 20. Do you agree that following the introduction of Ofsted school report cards, we should define stuck schools as set out above? (Options: Strongly agree; agree; neither agree nor/disagree; disagree; strongly disagree) Please explain your answer (Free text 250 words)**

**Question 21. Do you agree with our proposed intervention approach for stuck schools and that we should amend regulations to give effect to this? (Options: Strongly agree, agree, neither agree nor/disagree, disagree, strongly disagree) Please explain your answer (Free text 250 words)**

#### Strongly agree

- Leadership and governance are fundamental to a school's ability to improve. A school may face various challenges, but if leadership is weak or governance is lacking, these issues are unlikely to be addressed effectively, regardless of other interventions. As such, the specific emphasis given to the "leadership and governance" category in determining whether schools are causing concern is something NGA welcomes, as it is this internal capacity that will most heavily determine a school's ability to improve sustainably without structural change.
- Ultimately, by recognising leadership and governance as central to a school's ability to improve, this approach ensures that schools receive targeted support where it is most needed and enables a more focused and strategic path to improvement.
- We also appreciate the consistency between the Department and Ofsted in defining stuck schools. This alignment creates clarity for schools and stakeholders, ensuring a unified understanding of the expectations and the necessary steps for improvement. A consistent definition across both bodies helps avoid confusion and ensures that the support provided is coordinated and effective.

**Question 22. Do you agree that RISE should also engage with schools that have concerning levels of pupil attainment? (Options: Strongly agree, agree, neither agree nor/disagree, disagree, strongly disagree) Please explain your answer (Free text 250 words)**

**Question 23. What is the appropriate measure and approach for understanding if a school has attainment results of significant concern or shows a sharp decline in year-on-year pupil attainment, and may need external help to address these concerns? (Free text 250 words)**

#### Disagree

- While NGA acknowledges the potential benefits of RISE teams engaging with schools that have concerning levels of pupil attainment, we are concerned about the potential

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uncertainty, complexity and workload burdens this could impose on schools, as well as a blanket approach negating crucial contextual information.

- For all the limitations of snapshot school inspections, the inspection model provides a clear focus of external accountability, with clearly defined consequences if issues are identified. Attainment is, of course, proposed to be a specific category within this system, with Ofsted planning to combine externally verified performance measures with insights from its “on the ground” inquiries and conversations.
- One of the limitations of Ofsted inspection is the time between inspections, during which serious issues could develop, and this is one problem that intervention based on performance measures could help to address. However, we would be opposed to any intervention based on a single year’s performance data, where unrepresentative issues with the cohort or its teachers could have a major impact. At a minimum, we think a three-year average would be needed to provide a secure measure, and at that point the timeliness benefits when compared to Ofsted are largely lost.
- Adding a new form of external accountability also runs the risk of creating additional confusion and complexity for the sector. An effective intervention framework requires clear parameters of when intervention is triggered, and what it looks like. We would be worried that adding a separate measure would blur the picture for providers.
- Excessive intervention could also stifle the ability of schools to innovate and evolve pedagogical practices organically. Schools should be empowered to make changes through their own professional expertise, and too much intervention, albeit informal in this case, could limit natural collaboration and hinder the development of the desired ‘self-improving school system’. External accountability should work alongside meaningful internal accountability, led by governing bodies, which means giving schools the ability to react and evolve in response to performance trends before external intervention is necessitated.

**Question 24: Do you believe the proposed arrangements (any or all) would have a positive/negative impact on particular groups of learners or staff because of their protected characteristics? (Options: Strongly agree, agree, neither agree nor/disagree, disagree, strongly disagree) Please explain your answer, specifying which proposal your response relates to. (Free text 250 words)**

N/A

**Question 25: Do you have any suggestions for how any potential negative impacts on particular groups of learners or staff could be mitigated, or positive effects enhanced? (Free text 250 words)**

N/A



**Question 26: What do you consider are the likely staff workload and wellbeing implications and/or burdens of the proposals in this consultation? Please specify which proposal your response relates to. (Free text 250 words)**

- As the national body representing those exercising employer responsibilities in schools and trusts, NGA is acutely aware of the implications of accountability and intervention on staff workload. While the proposals aim to create a fairer and more transparent system, there is a risk of increasing administrative burdens. The introduction of RISE teams, coupled with new expectations from Ofsted that schools requiring significant improvement will have five monitoring inspections within 18 months, will undoubtedly lead to additional pressures on school staff and governing bodies alike. This could contribute to workload inflation, particularly if accountability measures do not align with existing improvement processes.
- However, we know that the status quo already presents significant workload and wellbeing implications. The goal of reforming this system is therefore overall welcome, and could deliver net benefits, subject to the caveats we have identified above. For example, the emphasis on a more nuanced and supportive approach to intervention following an inspection does somewhat reduce the stakes of an inspection, with benefits to leader's wellbeing.

**Question 27: Do you have any suggestions for how any potential negative impacts on workload and wellbeing could be mitigated, without negative effects on standards for children? Please specify which proposal your response relates to. (Free text 250 words)**

To prevent undue workload inflation from the proposed accountability changes, it is crucial to implement mechanisms that streamline expectations, ensuring that accountability remains a supportive process. Key considerations include:

- Reducing administrative burdens: aligning RISE team reporting requirements with existing school improvement frameworks to prevent duplication. Ensure that schools are not required to generate excessive paperwork but instead draw on existing data sources.
- Enhancing governance engagement: positioning governing boards as key partners in school improvement discussions who can support leaders rather than leaving them isolated.
- Intelligent, targeted Intervention rather broad 'engagement' for all: ensuring that intervention measures are proportionate to the level of need with no uniform model. This will avoid placing unnecessary demands on schools that already have the internal capacity, leadership and resources to continue delivering high levels of education.
- In a similar vein to Ofsted reform, embedding a culture that considers teacher workload and wellbeing at all times, so that interventions are supportive and minimally disruptive.

**Question 28: What steps could be taken to help reduce or manage any burdens leading up to and during the introduction of the proposed arrangements, without negative effects on standards for children? Please specify which proposal your response relates to. (Free text 250 words)**

1. **Reduce duplication:** the overlap between RISE teams and Ofsted monitoring inspections could create unnecessary administrative burdens and greater confusion for schools, meaning a coordinated approach should be established to avoid duplication. As such, clear guidance from the Department and Ofsted can reduce confusion and help manage expectations on how each of these strands work in tandem.
2. **Sufficient RISE capacity and diversity of perspectives:** RISE teams should include specialists on all school types and phases, and all elements of school improvement. This includes detailed knowledge of governance, which is an essential part of sustainable school improvement.
3. **Greater governance engagement:** governing bodies should be positioned as key partners in improvement discussions to alleviate pressure on school leaders and ensure strong and consistent internal accountability. By integrating governance oversight into the process, school accountability can be strengthened without overburdening staff.
4. **Targeted, not blanket, intervention:** RISE teams should focus on the areas where schools most need support, and their intervention should be proportionate to the school's needs.