

Improving the way Ofsted inspects education.

Consultation response from the National Governance Association, 25 April 2025

Introduction

The National Governance Association (NGA) supports an independent inspection regime and values the role of Ofsted in providing a vital strand of external accountability for schools, complementing the internal accountability provided by governing boards and trusts.

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 to how accountability for individuals' schools and the groups which run them can fit together.

We recognise the fundamental complexities involved in designing an effective inspection approach and believe that some of the proposals put forward by Ofsted in this consultation represent a shift towards a more nuanced and comprehensive evaluation of schools. Our response is pragmatic, focusing on providing clear and precise feedback to Ofsted on how the proposed inspection framework can be improved to work most effectively for schools and stakeholders. NGA continues to be an open minded, collaborative organisation that seeks to work with, and not against the inspectorate.

Executive Summary

NGA broadly supports most proposals in the consultation, particularly the move towards a more nuanced report card, the increased focus on inclusion, SEND, and disadvantaged pupils, and we welcome there is now a form of recognition of the importance of governance. However, we believe this could be strengthened, and that there are several areas where the proposals could be adapted to ensure that the inspection framework is as valid, reliable, equitable, kind and effective as possible.

Key Recommendations

1. Provide a clear criterion for 'good governance' to ensure consistent and transparent evaluations and to determine how good/effective governance is defined and evaluated including what governance expertise is required/quality assured of inspectors.
2. Refine and simplify the 5-point scale, to avoid ambiguity, reduce inconsistent interpretation and remove the potential for the scale and labelling to apply obstruction and distort opportunity for improvement.
3. Review the need for the blunt instrument of an 'exemplary' category, considering a return to a four-grade model, and ensuring grading does not equate to a 'five-star' culture of schooling, and is sensitive to a school's context.

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4. Ensure toolkits are significantly improved, offer clearer boundaries and eradicate existing ambiguity between judgment categories and are explicitly situated within existing expectations and guidance.
5. Clarify the definition of inclusion and ensure it is consistently linked to inclusion efforts across all evaluation areas.
6. Ensure governance is properly evaluated and included in the inspection process, clearly establishing how inspection will include the involvement of governing boards both during inspection and in implementing recommendations during monitoring process afterwards, with scheduled opportunities for governors/trustees to present evidence and receive detailed feedback.

1. What do you think of the report card?

- NGA welcomes the shift away from single word judgments to a more nuanced report card. This change is a step forward in recognising the complexities of a school's strengths and weaknesses within its particular context. However, the proposed approach to the report card and the defined 5-point scale it is based on currently allow too much room for ambiguity and complexity.
- The increased focus on inclusion, SEND and disadvantaged pupils, areas we have long argued need greater attention, is again a positive step in the right direction. However, we would stress that being able to report on these areas effectively is even more dependent on a clear understanding of a school's local and societal context. We are also concerned that inclusion, despite efforts in the proposals to weave it through evaluation areas, still runs the risk of existing as a bolt on, rather than being seen holistically as something that defines all areas of school life.
- A balance needs to be struck between the use of easily comparable metrics and the essential contextualisation of those figures which a physical inspection should be able to achieve. The proposals for the report cards do not yet offer sufficient room for taking account of context.
- We are glad Ofsted and DfE listened to our previous concerns and have updated the draft proposals to outline something of the importance of governance and recognising this explicitly through naming it as part of the "leadership and governance" category – the most important category for defining whether a school is causing concern. We would however emphasise that the robust external form of accountability provided by Ofsted must compliment the more regular internal accountability provided by the school's governing board, and trust board where relevant. Ofsted will only visit a school every few years, so it is essential that the inspection process draws on the scrutiny and oversight

already carried out by the board and external reviews (including, but not limited, to governance).

- We would also like to specify that the report card and inspection outcomes should give boards the tools to ensure that concerns identified by the inspection are quickly addressed. This might, for example, involve additional inspection feedback provided to boards, rather than just the report card, which, as emphasised by Ofsted, is fundamentally parent-facing and so will overtly prioritise being easily digestible.
- The current proposal overall has the potential to create a (welcome) shift away from overly reductive descriptions of a school's operation – but this is dependent on the caveats raised above and below. The adoption of report cards, a general principle we advocate for, could ultimately benefit the system as a whole through a more nuanced approach to evaluating performance. However, the intricacy of the proposed grading structure remains a major risk to achieving this, and the ambiguity in the 5-point scale and current lack of facilitating more contextual awareness and reflection currently renders the proposals substantially flawed in this area.

2. What do you think about our evaluation areas?

- We support the proposed increase in evaluation areas which aims to provide a more comprehensive picture of a school's performance, and we are generally at ease with most areas proposed.
- The inclusion of governance in the leadership category is important, but greater clarity is needed on how governance contributions will be measured. At present, the terms used are ambiguous: how is the “consistently strong contribution” of governance measured and determined? Will there be reference to the expectations set out in the DfE's governance guides, Academy Trust Handbook (ATH), and other statutory and non-statutory guidance?
- NGA proposes a clear criterion for good governance, including.
 - Evidence of a collaboratively developed and regularly reviewed strategic vision.
 - Robust mechanisms for holding school leaders to account for pupil outcomes, wellbeing and inclusion.
 - Effective stakeholder engagement and communication systems.
 - Clear differentiation of governance roles and communication mechanisms between local and trust-level governance in MATs and maintained school committees.
 - Robust financial oversight.
- Consolidating a criterion of ‘good governance’ will ensure consistent and transparent evaluations, but attention will also need to be given to ensuring the nuances of maintained and trust governance are sufficiently captured. The latter point is particularly crucial given the single school inspection model we are yet to move away from. Academies in a MAT are accountable to the trust board, whose distinct role cannot be directly compared to the role of governing bodies in schools maintained by the LA. As such, inspectors not only need to possess the relevant governance-specific knowledge to adequately evaluate leadership

and governance, but also an understanding of the role played by governance within different structures. NGA have supported Ofsted with training inspectors on these issues in the past and are happy to do so moving forwards.

- The other benefit of a clear criteria for “good governance” is that it makes it less likely that the specific role and value of governance is lost. While we are content to see a joint “leadership and governance” category”, it is essential that evaluation of the vital operational leadership of executives does not overwhelm the also essential strategic leadership of those governing. Reflecting this by ensuring that specific comments on the quality of governance are included in the report card will be important.
- As indicated in the previous question, while , there remains an element of concern that inclusion as a stand-alone evaluation area will lead to it being recognised as a ‘label’ - an area defined through deficit based labelling that triggers action through compliance dictated by a framework, rather than being a proactive and equitable expression of a schools culture and ethos.
- Ofsted’s adoption of inclusion as an evaluation needs to be mindful of the risk it facilitates a system of quick fixes, attitudes of tolerance or punitive action. We are concerned that simply adopting inclusion into a list of other evaluation areas will not do enough to integrate equitable approaches through the privileged position Ofsted resides in at the heart of the education system – although we accept Ofsted recognise this risk and have attempted to weave inclusion throughout. To mitigate this risk further, we would suggest that Ofsted and the DfE consult directly with organisations who have expertise in tackling deficit thinking, such as [Class 13](#), and use the new inspection system to advocate for a wider definition of educational disadvantage to be expanded and made more nuanced. This could draw on our [toolkits](#) produced in partnership with key organisations in the sector, through which NGA encourages schools and trusts to move beyond understanding disadvantage through a narrow lens. Using a substantial evidence base, we have established five broad drivers of educational disadvantage:
 - ▲ Poverty
 - ▲ SEND
 - ▲ Vulnerability (including looked after children/previously LAC and young carers)
 - ▲ Ethnicity
 - ▲ Mental health and wellbeing
- This level of breadth ensures assessments of inclusive practices are robust and informed by the lived experiences of young people. A broad definition of this kind ensures that all of the inclusive practices of schools can be properly captured by the inspection process.
- We are also concerned about the separation of curriculum and developing teaching, as the curriculum design is devoid of value unless it is accompanied by implementation, and we therefore suggest these two areas are brought together.

3. What do you think of our proposed 5-point scale for reporting our inspection findings?
4. What do you think about the other evaluation scales we have considered [binary met/not met, 3-point, 4-point, 4+ point, 7 points]?
5. Do you have any other ideas [about the point scale] we could consider?
 - The toolkit definitions on points on the scale, e.g. “secure” to “strong” to “exemplary” are not quickly understandable, an ambiguity that risks inconsistent interpretation by inspectors, schools and particularly parents and other stakeholders. Refining the scale with clearer labels would be helpful, although we appreciate that there is no perfect answer. A numerical scale, for example, would not work as it runs the risk of “3/5” being considered a problem by some parents, whereas it is understandable, if not problematic, to come to the conclusion that a “secure” label (with colour coding) provides a degree of clarity that reflects good practice. However, this all demonstrates a complexity that we think may lead to early misunderstandings around grades.
 - We accept that alternative rating scales present trade-offs. A binary met/not met system removes some of the issues around interpretation, but potentially fails to differentiate between levels of practice, such as between “secure” and “exemplary” or between “attention needed” and “causing concern”. A three-point scale would be more robust, allowing more nuance, and differentiation between those with improvement needs but the ability to address them or schools that need urgent intervention. Best practice, as already is the case, has other methods of identification, but can be captured narratively. More points on the scale provide more room for nuance, but less clarity on what each point signifies and ultimately a higher risk of inconsistency across the system.
 - As set out in question six, we would be open-minded to the “4+ scale” as a way of retaining the benefits of the 5-point scale but finessing how “exemplary” operates. However, we do not believe it is clearly superior to the “5-point scale” or 3-point scale, as it creates new problems, e.g. the lack of a clean break from the current system.
 - As such, NGA do not currently see an obvious option which is clearly superior, but a 5-point scale should at the very least see the removal of additional criteria for exemplary and the toolkit definitions and requirements should be simplified significantly to ensure clarity. We would suggest that consideration is given to whether some other categories might better fit the “met” / “not met” scale being used for safeguarding, for example attendance where there is a quantifiable bottom line which makes the gap between “secure”, “strong” and “exemplary” even harder to draw.
6. What do you think about our approach to ‘exemplary’ practice?
 - The ‘exemplary’ category requires careful consideration and should be approached with caution. In principle, the identification of very best practice has merit, but this raises a more profound question of whether inspection is trying to achieve too much.

- The awarding of “exemplary” runs a very real risk of being seen as a five-star grade, essentially reducing schools to a customer-based service, where anything below that being a failure. This will add a huge amount of pressure to leaders and risks increasing anxiety among teachers and exasperating an already widely accepted retention crisis. The profession will further suffer as performativity is increased and surveillance and fear of judgement become too overwhelming for some.
- A drive to ‘exemplary’ may also be to the detriment of the governments drive to increase school to school collaboration, with an almost commercial driver to reach 5-star status likely perpetuated by a range of private organisations looking to capitalise on being Ofsted ready. A “4+ scale” where exemplary practice was identified outside of the headline reporting scale may offer some solution, retaining the benefits of “exemplary” while addressing some of the challenges, but we recognise it is not a perfect solution as it potentially leads to a grading scale that is too similar to the present model.
- We would also ask that the identifying of exemplary practice is done in a way which is entirely in correspondence with a school’s context. It would be helpful for Ofsted to report on the characteristics of the schools where “exemplary” characteristics are identified, e.g. levels of deprivation, to demonstrate it has done this. The argument for this is not just about fairness and a “level playing field”, but also the key point that if the goal is to identify and spread best practice then that practice needs to be shareable, not something which only a minority of schools could realistically achieve.

7. What do you think about including data alongside report cards, for example information about how well children and learners achieve?

- NGA see the benefits of including other data alongside report cards, as this helps to reduce the stakes of an inspection by incorporating other measures which track a school’s success beyond a two-day window. However, many performance measures have their own flaws, and it might create confusion for parents where there appears to be duplication between the Ofsted report and other data, e.g. balancing the “achievement” report card category with other measures. There is also the danger of a time lag, where the latest Ofsted report might be three or four years old, and so include performance measures which are far less relevant than the latest data.
- As such, we think the best option would be for Ofsted to stick to their report categories and leave the Department to report other external measures alongside the report, e.g. via school profiles. As stated above though, we do think there is room for Ofsted inspectors to draw more closely on both data and other external reviews (e.g. of safeguarding or governance) and use these findings as key building blocks in their own judgements.

8. What do you think about the inspection toolkits?

- At present, the toolkits and descriptions fail to offer clear boundaries between the start and end of a judgement category. Whilst we acknowledge that inspector’s judgements will,

to some extent, exist on a continuum, there must be a much clearer indication of the parameters in which such judgments are being made.

- Terminology used in the toolkits is consistently vague and unhelpful, lacking precision and widely open to interpretation. For example, exemplary is left widely undefined.
- We would also suggest that the toolkits should instead explicitly be situated within what already exists in the sector – both performance measures (see question 7), statutory guidance and other definitions of core standards from the Department and sector leaders. Ofsted should not be creating vague expectations, instead the toolkits should explicitly reflect the expectations which are already set for schools by law, the Department and sector leaders.

9. What do you think about the research, statutory guidance and professional standards that we have considered? Are there any others we should consider?

- The links to existing expectations need to be clearer, as set out in question 8, and sources will be needed for the greater clarity on standards and evidence we set out above. We would highlight that key Department documents such as the Governance Guides and Academy Trust Handbook reference the documents produced by sector partners such as NGA as best practice, so these documents should be incorporated to ensure consistency.
- In terms of statutory guidance, we noticed the absence of the [Children missing from education statutory guidance](#), which we think will have relevance.

10. What do you think about our working definition of inclusion, and how we will inspect inclusion?

- The existing definition is ambiguous and broad. At no point does the passage explain exactly how schools ought to be appropriately ‘inclusive’. For the category to be meaningful, it is important to be based on a universally applied definition, defined by government. While we would encourage Ofsted to view this through the lens of NGA’s understanding of disadvantage discussed in question two, Ofsted should not be operating in silo from the DfE on this matter.
- The standalone inclusion category must also be clearly linked to inclusion efforts across all evaluation areas to prevent inconsistency in judgments.
- Further, the toolkits suggest that ‘inclusive practice’ will be an element considered across all evaluation and sub-evaluation areas. It currently reads as though this is primarily judging how well each area supports the inclusion of pupils with SEND. We would consider rewording this to “accessible practice” to avoid duplication.

11. How suitable is the toolkit for use in special schools and alternative providers?

- Special schools and AP settings educate a unique population of pupils, who experience greater barriers to learning, and those who are often subject to greater safeguarding risks.

The largely context driven provision for these pupils also means they have more nuanced
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and greater ranging measures of progress. While the toolkit mentions adaptations, it does not explicitly differentiate how inspectors should evaluate progress in settings where pupils may have highly individualised needs. In these contexts, defining “inclusion” as a standalone category is even harder and may need to be reconsidered, as the school’s success in inclusion will heavily influence the judgement in every other category.

12. Do you think the toolkit will be suitable for different phases of education and other types of providers?

- The rationale for the distinct approach to inspecting early years provision within a school and early years provision outside a school isn’t entirely clear. We also wonder if, as part of the work to add greater clarity to the toolkits on expectations, it might be sensible to have separate toolkits for primary and secondary phases.

13. What do you think about our proposed approach to align the inspection of non-association independent schools and state-funded schools as far as possible?

At NGA, our members are only state-funded schools, but we support the principle of a level playing field as far as possible. Ultimately, children have the same needs in both school types.

14. What do you think about our proposed changes to how we carry out an inspection?

- NGA welcomes the focus on empathy in interactions between inspectors and leaders. The emphasis on transparency and open dialogue, starting with initial conversations to understand a school’s context, aligns with our belief in constructive and intelligent accountability.
- The removal of deep dives is a quick win that immediately reduces pressure on staff, allowing inspectors to streamline evidence gathering to a school’s specific priorities as opposed to standardised areas of focus. This flexibility ensures inspections avoid unnecessarily burdening a small number of subject leaders. We also support the move to reduce administrative workload by focusing on live discussions.
- However, the approach to the inspection of governance remains unclear. While the proposed reforms acknowledge the importance of leadership, they fail to clearly define how governance will be evaluated within the inspection process. Proper evaluation and engagement with those governing is essential, as it is boards who provide the year-round accountability that Ofsted cannot. To address this, Ofsted must ensure those governing continue to be formally included in inspections with scheduled opportunities to present evidence of their impact, and detailed feedback following the inspection.

- At present, governors and trustees often meet inspectors relatively late in the inspection process, sometimes as an isolated strand of a school's oversight rather than as a crucial part of leadership evaluation. This limits the ability of boards to feed into inspection findings and provide strategic context which could help inform how inspectors use their time if received earlier. The nature of governance as a board of volunteers with other commitments does provide logistical challenges, but it must be possible to better involve boards, even if via the digital means through which much governance business is conducted today (e.g. Zoom or phone conversations).

15. What do you think about our proposed changes to monitoring?

- NGA welcomes the positive focus on targeted, supportive monitoring, where inspectors concentrate on the specific areas of weakness and provide practical guidance to help schools move forward. This greater flexibility aligns with NGA's vision of contextual accountability, where approaches are tailored to the individual school's journey. The ability to produce updated report cards during monitoring inspections, where possible, enhances transparency and allows for more immediate feedback.
- However, it will be crucial that monitoring is proportionate and does not become overly burdensome for school leaders. Clear expectations should be developed on what to expect from monitoring visits and its scope must be communicated to all involved in the process.
- It remains unclear how this will work alongside the RISE programme of universal support, and we remain unconvinced that given existing time pressures on the inspectorate, that it has sufficient capacity to work towards this proposal.

16. What do you think about how we propose to identify schools causing concern?

- NGA supports the proposed clarification and renaming of categories of concern, particularly the shift from "serious weakness" to "requires significant improvement" to align with statutory language. This adjustment helps ensure consistency and clarity in communication, reducing potential confusion for schools and stakeholders. We also agree with the specific emphasis given to the "leadership and governance" category in determining whether schools are causing concern, as it is this internal capacity which will most heavily determine a school's ability to improve without structural change.
- We also support the collaborative approach between Ofsted and the DfE in the identification of schools requiring significant support, ensuring a more coherent and consistent response across both bodies.

17. What do you consider are the likely workload and well-being implications of these proposals?

- NGA recognises the potential for these proposals to streamline evidence gathering and reduce the administrative burden on school leaders. However, the overall increase in evaluation areas also carries a risk of more, not less Ofsted, and resulting in more concentrated work from schools on Ofsted preparation, despite Ofsted agreeing with is

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that this is not healthy cultural behaviour. Nonetheless, we have to accept that currently, this remains the sector norm, and the high stakes associated with inspection remain a huge driver of practice and workload.

- While providing earlier intervention and support is a positive step, the frequency and depth of monitoring also risk introducing increased workload for both leadership teams and governing boards. As set out in [NGA's workload research](#), governors and trustees already dedicate significant time to their existing responsibilities, with limited spare capacity. As such, any additional inspection expectations must recognise the voluntary nature of their role and cannot place unrealistic demands on them. One way Ofsted can support this consideration is publicly advocating for employers to provide enough time off for employees to govern, part of which includes their role in attending inspections. As a key voice in the public, Ofsted is well placed to platform the importance of governance as a civic duty and encourage more employers to recognise its value.
- As the body carrying out employer functions in schools and trusts, those governing are also acutely aware of the implications of inspection on staff workload. External inspection will always cause some degree of stress where there are meaningful consequences if concerns are identified. However, Ofsted can do more to minimise workload and wellbeing implications of inspection. The departure from single-word headline judgements is a start, but we would also emphasise that the concept of "Ofsted-approved" approaches to marking, teaching and much else remains pernicious. More can be done to myth bust and make it clear that Ofsted do not create any additional expectations to those already set out by law and government.
- Our 2024 annual survey results reveal a stark reality: Ofsted wields significant influence over school practices in England. Over half of the respondents (51%) identified Ofsted as the single biggest factor shaping practice within their school or trust. This finding underscores the profound impact of the inspection framework on system culture, day-to-day operations and strategic decisions made by school leaders and educators. Under these new proposals, workload implications remain significant and unnecessary and are potentially increased. The prominence of Ofsted as a driving force in how schools operate a substantial amount of their business raises a huge question about the extent of its influence and why this is – the introduction of a 5-point grading system heralding a drive to 5-star education provision sounds major alarm bells. While the report card proposals aim to ensure a more nuanced form of accountability which is to be applauded, it's crucial to examine whether the realistic impact aligns with intentions. Is Ofsted fostering a focus on genuine learning and wellbeing, or are schools primarily driven by compliance and the pursuit of 5-star level provision.

18. Question: What could we do to help reduce or manage any unintended consequences?

- As previously stated, despite maintaining a number of significant concerns regarding some proposals, NGA welcomes an ongoing positive working relationship with Ofsted and DfE on developing the way forward and eventual implementation. We remain concerned that the existing timelines for implementation places unneeded pressures on the architecture of a new era of accountability, and that no real room has been given to have a more fundamental and deep exploration of what accountability is and how the system accesses it.
- In summary, there are things we welcome, and things that really concern us, but we also recognize that the stakes have never been higher in delivering an inspection system that truly serves the sector, rather than the sector continuing to serve an inspection system. Our key asks are for a simplified and refined grading scale, for unnecessary complexity to be replaced with simplicity and clarity, for the integrity of governance in the framework to be developed, and for a more considered approach to how inclusion is embedded.

19. Question: Is there anything else about the changes to inspection that you would like to tell us?

While NGA welcomes the greater clarity and structured monitoring process, there remains a lack of emphasis on governance evaluation. This means that:

- Inspectors should routinely meet with governors/trustees, ensuring their role in holding leadership to account is fully considered.
- Governance must feature in inspection reports, with specific, actionable feedback rather than isolated comments within evaluations focused on operational leadership.
- MAT governance structures should be assessed at the appropriate level, specifically, local governance and their varying delegated functions must be understood within the wider trust accountability framework.

20. Please tell us how you think our proposals may or may not impact equality.

N/A