



# Towards Intelligent Accountability for Schools

A policy statement on School Accountability

Policy paper 5

*Over-accountability is the enemy of creativity and risk-taking.*

Ernest Boyer, former US Commissioner for Education

*... our vision of a schooling system where the combination of devolved power and intelligent accountability promotes informed and effective professionalism.*

David Miliband, Minister of State for Schools, 27 January 2003

## INTRODUCTION

- 1 The Secondary Heads Association believes that school accountability is very much greater than is necessary to ensure the effectiveness of a public service. This over-accountability increases bureaucracy and acts as a disincentive to creativity. SHA believes that the government should review the accountability of schools and examine ways in which a slimmer accountability regime could better support schools in raising achievement and fulfilling their wider aims. This would move schools towards the intelligent accountability to which David Miliband referred in his speeches to the North of England Education Conference in Warrington on 8 January 2003 and to a conference on performance management in Bournemouth on 27 January 2003.
- 2 Although this report focuses on the accountability of schools, it should be noted that the accountability burden on colleges is also unacceptably large. Because of the incorporated governance structure of colleges, some of the issues are different, but the overall picture is similar. SHA, which has members in over 100 colleges, believes that the government should also adopt the notion of intelligent accountability for colleges and should review their accountability structures accordingly.
- 3 SHA accepts that proper safeguards are required for the spending of public money and the quality of delivery of public services. The public is entitled to reassurance that funds are being spent with propriety and that the service is efficient and effective. Current levels of accountability in education go much further than this.
- 4 Head teachers are accountable to parents, governing bodies, local education authorities, central government, the Qualification and Curriculum Authority (QCA), Ofsted, the Learning and Skills Council (LSC), Connexions Partnerships, Local Strategic Partnerships, Local Lifelong Learning Partnerships and Child Protection Officers. Like any employer, they are also accountable to a number of statutory bodies, including the courts, the Health and Safety Executive, the Commission for Racial Equality and the Equal Opportunities Commission. Heads frequently find themselves held accountable in the media. Heads of schools working in collaboration are accountable to the partnership organisation.
- 5 Heads are accountable annually for their performance and the achievement of their personal targets to the governing body through an *external adviser*. This is an improvement on previous arrangements for the appraisal of head teachers. School governing bodies (but, in practice, head teachers) are directly accountable to parents annually for their performance through the requirements to hold an annual meeting for parents and to write a governors' annual report, with a statutory obligation to report on certain areas of the school's performance. The annual meeting is rarely attended by more than a handful of parents. SHA recommends that the governors' annual report to parents should be retained, but without the statutory requirements on its contents. SHA recommends that the requirement to hold an annual meeting for parents should be abolished and the time spent more productively on better ways of engaging with parents.
- 6 For every new government initiative or funding stream, head teachers acquire a new accountability. For example,
  - in Excellence-in-Cities areas, they are accountable to their Excellence-in-Cities Partnership Board;
  - specialist school heads are accountable to the Specialist Schools Trust;

- heads of academies are accountable to the school's sponsors;
- all heads of schools with post-16 provision are accountable to their local LSC;
- all heads are accountable to an *external assessor* for their judgements on teachers' performance at the pay threshold.

SHA recommends that new lines of accountability should not be introduced for new initiatives and funding streams and that existing accountability measures should be used.

- 7 A head teacher reports (February 2003) that his school is in the fifth term of an Excellence Cluster (EC). During that time, his school has had two visits from researchers from the National Foundation for Educational Research (NFER), visits from an LEA monitoring team, a questionnaire in connection with the Ofsted inspection of the Cluster and an 18-page questionnaire from NFER. The school has also undergone a full Ofsted inspection that, *inter alia*, evaluated the EC work.
- 8 The latest example of this growth in accountability is the Leadership Incentive Grant (LIG), a substantial new funding stream to 1400 secondary schools. The LIG Guidance introduces a new range of accountabilities, including new powers for local education authorities. SHA believes that the excessively bureaucratic LIG Guidance should be scaled down and that normal lines of accountability should be used for the spending of LIGs.
- 9 SHA looks to the new Implementation Review Unit, formed as part of the national agreement on teacher workload and remodelling the school workforce, not only to limit the bureaucracy of new initiatives, but also to limit the growth in accountability. SHA believes that all proposed new accountabilities should be vetted by the Implementation Review Unit.
- 10 It was not always thus. Before 1980, schools had a cosy relationship with their local education authority, with weak governing bodies and parents often kept at arm's length. Teachers were professionally insulated from the world beyond the school gate and the public had little knowledge of what happened in schools. This undesirable situation caused an over-reaction, bringing ever greater accountability to schools and particularly to head teachers. The reaction began with James Callaghan's Ruskin College speech in 1976. During the 1980s and 1990s, governing bodies were restructured and given considerably more responsibility. The volume of work for school leaders of servicing the governing body increased greatly. The line of accountability from the head to the governing body became much clearer and the accountability, which had previously been nominal, became real. Parent governors, in particular, took a keen interest in all aspects of school life and held the head to account for any perceived shortcomings in the school. Parents became 'consumers' of education, encouraged to choose the best school for their children. Schools consequently became the 'producers' or 'providers' and were often considered to have a vested interest in what they provided. The idea that the school was doing its best with scarce resources to act in the interests of its pupils was lost in the harsher world of consumerism and the education marketplace. (Downes, 1999)
- 11 National accountability increased through the publication of HMI inspection reports on schools from 1983. Local newspapers seized the opportunity to give often partial accounts of inspectors' findings. The infrequency of these inspections meant that it was something of a lottery whether any one school was held to account in this way. In 1992, the microscope of Ofsted inspection fell on all schools. HMI had been viewed by the profession as even-handed in its criticism, reporting as it found and criticising schools and the government in equal measure. Ofsted, on the other hand, was perceived to hold schools, but not the government, to account.

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## ACCOUNTABILITY AND TRUST

- 12 Onora O'Neill argues powerfully in *A Question of Trust*, the BBC Reith Lectures 2002, that the present culture of accountability in the public sector damages trust rather than supports it. She notes that professional people, including teachers, are no longer trusted and believes that "this crisis of trust is a crisis of suspicion". Although the pursuit of accountability provides citizens and consumers with more information, it builds suspicion, low morale and professional cynicism. She writes:

*In the public sector, the new accountability takes the form of detailed control. An unending stream of new legislation and regulation, memoranda and instructions, guidance and advice floods into public sector institutions. ... The new accountability culture aims at ever more perfect administrative control of institutional and professional life.*

*The new legislation, regulation and controls ... require detailed conformity to procedures and protocols, detailed record-keeping and provision of information in specified formats and success in reaching targets.*

*Many public sector professionals find that the new demands damage their real work. ... The new accountability is widely experienced as ... distorting the proper aims of professional practice and indeed as damaging professional pride and integrity. ... Professionals understandably end up responding to requirements and targets and not only to those whom they are supposed to serve.*

(O'Neill, 2002, pp 43-51)

The proper accountability of professionals to the public, O'Neill continues, is replaced by accountability to regulators, government departments, funders and legal standards.

- 13 The situation described by Onora O'Neill has contributed greatly to the problems of teacher recruitment and retention.
- 14 This answerability to a wide range of bodies diminishes professional responsibility and thus accountability in a moral sense. While answerability has grown exponentially, school leaders have tried to maintain their professional accountability, continuing to give of themselves well beyond what could reasonably be expected. Their professional accountability is defined by their commitment to their schools and forms the basis of sustainable school improvement, engagement in the transformation process and the development of schools that educate children in the widest sense. It is because of this professional accountability of school leaders that schools do not confine themselves to the narrow outcomes defined by national performance indicators.

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### THE WEAPONS OF PUBLIC ACCOUNTABILITY: PERFORMANCE INDICATORS, TARGETS AND LEAGUE TABLES

- 15 O'Neill points out that performance indicators, although seen as a way of improving the performance of public sector institutions, are chosen "*for ease of measurement and control rather than because they measure quality of performance accurately*" (O'Neill, 2002, p.54). The classic example of a badly chosen performance indicator in the schools sector is the proportion of 16 year olds attaining at least five "good" GCSE passes at grades A\* to C. Originally chosen at the time of the introduction of the GCSE examination in 1988, it was supposed to be the equivalent of the five GCE Ordinary level passes that had for many years been a passport to certain types of employment and were required by some schools as an entry requirement for advanced level study. This is a bad measure both for schools and for the vast majority of their students, for whom five A\*-C passes represent either too high, or too low, a hurdle. SHA has been a consistent exponent of value added as a performance indicator, recommending z-scores as a sound statistical basis for the value added calculation (Neal, 2001). Furthermore, the output measure in such a value added system should not be the proportion of students gaining five A\*-C passes at GCSE, but the average points score of the best eight GCSE results.
- 16 Poorly chosen measures, such as the proportion of an age cohort gaining five A\*-C passes at GCSE, create perverse incentives for schools. Resources are often concentrated on pupils at the C/D borderline, sometimes to the detriment of those who could perhaps raise a grade B to an A, or an E to a D. The age-relatedness of the performance indicator dictates that many pupils have to be entered for examinations when they are not ready for them. As O'Neill points out, these perverse incentives are real incentives for the schools on which they are imposed. Thus Advanced level students are guided into studying subjects in which higher grades are easier to achieve, contributing to shortages of graduates and teachers in the subjects perceived harder, such as modern foreign languages, mathematics and the physical sciences (which, ironically, may be the subjects in which the country most needs more graduates). Primary schools are criticised for narrowing the curriculum in response to the pressure of targets set on national test results in a limited range of subjects. All of these are rational responses by schools to the performance indicators on which they are judged and the targets they are set. Badly chosen performance indicators warp professional

judgements and undermine the professionals making them. Performance indicators for schools should be chosen in a way that minimises perverse incentives.

- 17 David Bell, Her Majesty's Chief Inspector of Schools in England, has stated that

*One of the things inspectors find is that an excessive or myopic focus on targets can actually narrow and reduce achievement by crowding out some of the essentials of effective and broadly based learning. They also find teachers, heads and local authorities for whom targets are now operating more as a threat than a motivator, more as a stick than a carrot. ... The time is now right to take greater account of what teachers are saying about the pupils in their own schools.*

(Bell, 2003)

- 18 As part of their role in school improvement, local education authorities have played a part in the target-setting regime for schools. Instead of schools being allowed to set their own targets in the light of circumstances and the prior attainment of individual cohorts of pupils, local authority inspectors have been forced to exert pressure on governing bodies to set attainment targets that fit with the targets set for the LEA by the government. In 2002, only Cornwall refused to participate in this top-down accountability exercise. LEAs should not be required to participate in this target-setting activity, which is the antithesis of productive, motivating target-setting by those responsible for the actions that will directly lead to the achievement of the targets. This should be the responsibility of the schools themselves.
- 19 The government's failure in 2002 to meet its own targets for achievement in key stage 2 tests should have brought home to ministers a fundamental lesson about target-setting, which they could have learnt much earlier from reading the SHA book on targets (Neal and Hutchinson, 1998). This sets out clearly the difference between aspirational targets and accountability targets and the ways in which schools – and the government – can beneficially use both types of target-setting.
- 20 Apart from academic attainment targets, other performance indicators and targets for schools have had a similarly adverse effect. In 1998 the government decided that the number of pupils permanently excluded from schools should be reduced by a third. This was subsequently reinforced by a Circular (DfEE, 1999) making it more difficult to carry out exclusions. Very soon, the target and the Circular were both seen to be working against the interests of schools and of the vast majority of pupils who were (according to Ofsted evidence) well behaved. The responsibility of the head teacher for good discipline was being undermined by the target set by the government.
- 21 In December 2002, the government announced that it had failed to meet its target to reduce truancy in schools. Indeed, it had failed to bring about any improvement at all. Head teachers are held responsible for the levels of pupil attendance, a critical performance indicator in Ofsted inspections, yet the ultimate power to deal with truancy lies with education welfare officers and the local education authorities that employ them. The responsibility of the head has long been undermined by the failure of LEAs to act strongly on persistent truants and their parents. The present government has at last recognised the need for firm action on truancy in support of head teachers.
- 22 The lesson to be drawn from these examples on discipline and attendance is that performance indicators and targets for schools should always be supported by the means for head teachers to deliver them.
- 23 Performance indicators can be particularly cruel and unjust on schools in challenging circumstances. The so-called "floor target" of 25 per cent GCSE passes at grades A\*-C is a particularly inappropriate measure by which to judge the performance of these schools. These "floor" targets should be abolished and targets based on value added should be substituted.
- 24 Performance tables of raw examination results are particularly unfair on schools in challenging circumstances, but their malign influence extends well beyond these schools. They purport to produce an order of merit of schools, which tells the public little other than the ability of the pupils on entry. They work directly against the government's own policy of improving educational inclusion. The SHA policy statement on inclusion states that

*raw score league tables (and targets which are based on raw-score outturns) are probably the most potent instruments of educational exclusion. Many of these tables are literally exclusive: they refer to a percentage of the population which excludes the least able. More insidiously, they provide the strongest possible perverse incentive to schools to recruit the most able pupils.*

(SHA, 2000)

- 25 The case against national performance tables has been supported by the Audit Commission in its report, *Special Educational Needs: A Mainstream Issue* (Audit Commission, 2002). The report comments on the inadequate performance measures for schools' work in SEN. It notes the tension, caused by national performance tables, between the standards agenda and the government's policy on inclusion, making the same point as the SHA report quoted in the previous paragraph. The league tables, the Audit Commission states, are

*failing to reflect the considerable achievements of some of the hardest-to-teach children and their teachers. ... A school that is highly inclusive is likely, almost by definition, to have a higher proportion of pupils at the lower end of the attainment spectrum. It may therefore appear to perform poorly in a league table. Conversely, a school that is not welcoming to children with SEN may appear to be a 'good school' simply because it has fewer pupils with learning difficulties.*

(Audit Commission, 2002, paras 122-3)

The Audit Commission report recommends that the government should create new systems for recognising and celebrating schools' work with children who have SEN. SHA strongly supports this recommendation.

- 26 The national performance tables in their present form, even when recording value added in addition to raw scores, have no part to play in an intelligent school accountability framework, which seeks to promote other legitimate government aims, such as raising the achievement of *all* young people and educational inclusion. This is equally true of performance tables at ages 11, 14, 16 and 18. National performance tables should be abolished and replaced by an obligation on schools to publish examination results and value added statistics locally, thus providing information to parents, prospective parents and the community that the school serves.
- 27 The recent, welcome encouragement from the government to school collaboration is in marked contrast to the culture of competition that has characterized government policy on schools since 1979. In a culture of collaboration, the publication of league tables of the performance of individual schools is misplaced and counter-productive. Professor Michael Fullan has written that system-wide improvement is dependent on collaboration (Fullan, 2001). Professor David Hopkins, head of the DfES Standards and Effectiveness Unit, stated at the DfES regional conferences for secondary head teachers in autumn 2002 that accountability measures must change to reflect the government's greater emphasis on collaboration.
- 28 The green paper on 14-19 demonstrated why tables of the performance of 16 year olds make no sense in a 14-19 qualifications system, but lacked the courage to make any significant recommendations on the future of these tables (DfES, 2002). Many schools and colleges are now collaborating on post-16, and even post-14, provision. Where this is happening, examination results should be published for the consortium as a whole and not for the individual institutions. That will provide a real incentive to raise achievement collaboratively. The new school federations, and partnerships that fall short of full federation, should also be able to publish results collectively. The government has made a step towards this by allowing the possibility of joint reporting of the examination results of federations (DfES, 2003).

## CURRICULUM AND ASSESSMENT

- 29 From her study of the accountability of public services in Britain, Onora O'Neill concludes that "*central planning may have failed in the Soviet Union, but it is alive and well in Britain today*" (O'Neill, 2002). Nowhere is this more evident than in the national curriculum, introduced in the Education Reform Act 1988. The level of detail contained in this primary legislation has caused immense trouble for successive administrations, for example in the prescribed curriculum for 14 to 16 year olds, which was seen by SHA from the outset as an ill-informed attempt to fit a curriculum quart into the pint pot of a timetabled school week. Although some of the detail has been reduced, most notably in the 1993 review conducted by Sir Ron (now Lord) Dearing, the national curriculum in England and Wales remains a highly prescriptive, centralised curriculum. The Qualifications and Curriculum Authority (QCA) merely recommends curriculum changes to the government. It is the government that decides what is taught in schools. Unless the QCA is led by a sufficiently strong-minded and independent chief executive (as it currently is), there is a danger that it will say only what it believes that the government wants it to say. This is a very unsatisfactory situation. SHA regrets that the Tomlinson Inquiry into A levels did not recommend that the QCA should become

independent of the DfES. SHA recommends that the QCA should be responsible to Parliament, not to the DfES.

- 30 The government has a legitimate interest in what is taught in publicly funded schools, but this should not be at the level of detail that now exists. The new requirement to teach citizenship and the detailed curriculum in this subject are the latest examples of this prescription from central government. The government should establish a framework for the national curriculum and schools should be able to interpret this in their local context.
- 31 In its paper, *Examinations and Assessment*, SHA outlined the confusion that currently exists about the purposes of external examinations and assessment (SHA, 2002). In particular, the SHA paper argued, the purpose of examining has become confused with school accountability and the performance management of teachers. The same assessments are used for the following purposes:

- Diagnostic assessment
- Formative assessment
- Summative assessment
- Evaluative assessment

They are also used for:

- a component of the qualifications structure
- monitoring progress
- teachers' performance-related pay
- school performance tables
- meeting national targets

Of the last group of five purposes, three are evaluative, demonstrating how the government has skewed the assessment system from its prime purposes of diagnostic and formative towards the evaluative. The multiple purposes of assessment are admitted in the government's paper on 14-19, although the full list was not included (DfES, 2003, paragraph 4.15). Assessment of the work of children has become primarily a tool of accountability of teachers and schools.

- 32 The progress of the education system as a whole could be monitored more efficiently and effectively. The aggregation of individual test scores creates a high-stakes testing system in which the pressure is bound to create a false picture of progress. National curriculum testing should not therefore be used to monitor progress towards the achievement of national targets. Instead, random sampling tests should be carried out by a new body, similar to the former Assessment of Performance Unit (APU). Monitoring of progress should be by national sampling, not by national saturation, as we have at present (SHA, 2002).
- 33 At all levels of testing and examinations, greater trust should be placed in the professionalism of teachers who have, in recent years, become more rigorous and skilful at assessment. Internal summative assessment should play a greater part in the examination system. National curriculum tests at 7, 11 and 14, GCSE, AS and A level examinations should rely more on internal assessment through the professional judgement of teachers.
- 34 A problem with relying more on internal assessment by teachers is that there is a lack of public trust in the professional ability of teachers to carry out such assessment rigorously. A change in the balance between external and internal assessment must take place in a way that maintains public confidence in the qualifications system.
- 35 SHA has proposed the establishment of a cohort of Chartered Examiners, a system of internal assessment that will produce no loss of rigour in examining and will thus hold public confidence. Chartered Examiners will be experienced teachers, responsible for carrying out or overseeing rigorous internal assessment that will form a substantial proportion of externally awarded qualifications. It will be the responsibility of the Chartered Examiner to mark and grade work at the standard of the external qualification to which it contributes. The SHA proposals on Chartered Examiners (see SHA, 2002, Annex) should be piloted and, if

successful, adopted nationally as soon as practicable.

## INSPECTION AND QUALITY ASSURANCE

- 36 Since Ofsted began work in 1992, schools have been subject to a system of external quality control that has long been rejected by business organisations. As the leading agent of school accountability, Ofsted should always have been aware of the potential for schools to react to its inspection regime defensively, but the rhetoric of its leader and the design of the inspection methodology contributed much to the feelings of over-accountability in schools. Worse still, Ofsted came to be seen by schools as an agent of government control and not the independent inspection agency, with inspectors commenting on provision as they found it, which had been the hallmark of Her Majesty's Inspectorate for generations.
- 37 With a change in the leadership of Ofsted in 2000, the agency is now seen to be more even-handed and the incremental changes to the framework for inspection have begun to make school inspection a more collaborative process. In particular, school self-evaluation (SSE) has begun to play a stronger role.
- 38 In an intelligent system of quality assurance (QA) for the performance of schools, external inspection has a role to play alongside internal school self-evaluation (SSE). For schools that have developed and implemented an effective SSE programme, external inspection should be a validation of the school's SSE process. For schools with a less well developed SSE programme, a greater degree of external inspection remains necessary. The inspection framework should be sufficiently flexible to adapt to the state of development in each individual school.
- 39 The situation is particularly difficult for schools in challenging circumstances, which are subject to frequent HMI inspections. Ever since the publication of the first HMI reports on individual schools, it has been apparent that schools in challenging circumstances are more likely than schools in more advantaged neighbourhoods to be criticised for their performance. Depending on the approach of the individual inspector, these schools are put under immense pressure by the current system. Instead of frequent inspections, schools under special measures or in one of the other categories of "failure" should have an agreed programme of external support, with clear roles for external consultants to work with the head teacher on the action plan and the meeting of objectives. The external consultants would report on progress, thus reducing the need for such frequent HMI visits.
- 40 Inspection of post-16 education has grown considerably since the advent of the Learning and Skills Council (LSC) in 2001. Institutions with post-16 provision are variously subject to Ofsted inspection of individual schools, Ofsted area inspection, LSC provider review, LSC strategic area review, LEA monitoring of school quality and various levels of financial audit. Schools working in post-16 consortia are inspected by Ofsted, not only during their own school's inspection, but also as part of the inspection of the other institutions in the consortium. Schools have little confidence about the knowledge and expertise of many of the people carrying out LSC and LEA reviews. By contrast, Ofsted has recently insisted on special training and appropriate qualifications and experience for those inspecting post-16 work. Even though its post-16 inspections are now more rigorous than previously and there is insufficient acknowledgement within the framework that institutions with a proven record of success require less inspection, Ofsted's new framework for post-16 inspection has been welcomed by institutions. SHA believes that the amount of external inspection and monitoring of the post-16 work of schools should be drastically reduced, as follows:
- LEA monitoring and LSC quality assurance processes should rely on data from Ofsted inspections and on existing data from the schools themselves.
  - Post-16 (shortly to be 14-19) Ofsted area inspections and LSC strategic area reviews (also to be 14-19) have considerable areas of overlap. LSC strategic area reviews should not impose additional visits or data demands on schools. They should be phased sensibly with Ofsted area inspections.
  - Post-16 inspection and review should be in inverse proportion to the proven quality of an institution.

- Reviews of post-16 (or, in the future, perhaps post-14) performance should be an interactive process between the school and the LSC. This work should not be duplicated by LEAs. Reviews should occur no more frequently than once per year and should not be box-ticking exercises.
  - Financial audit procedures should be agreed between the LSC, LEAs and heads' representatives and should be administered by the LEA (from which information could be passed to the LSC).
- 41 Rigorous nationally approved audit procedures are essential to maintain public confidence in the probity of financial management by heads and governors. Such procedures would act as a safeguard to school leaders, as well as a guarantee to the public. There is a need for improved accountability processes of financial audit for schools. The best example of financial accountability was the so-called "rainbow pack", issued by the Funding Agency for Schools to grant maintained schools. By contrast, many LEAs carry out less detailed and less frequent audits of school accounts. Ofsted has a useful self-audit package (Ofsted, 1993) to assist schools in putting good procedures in place, but there is a place for a nationally agreed audit process for school funds, both public and "private".
- 42 The performance pay threshold, introduced into all schools in 2000, called on head teachers to make a judgement on the quality of the work of all experienced teachers. In order to ensure that heads' judgements were fair and consistent with national standards, an external assessor was appointed to each school to confirm or overturn each of the head's judgements. Apart from the immense cost and associated bureaucracy, an unnecessary additional layer of accountability was introduced, the main effect of which was to confirm 99 per cent of heads' judgements. In the following two years, this has been reduced to a system of sampling by the external assessors. However, especially now that heads are more experienced in the working of the threshold standards, there is no need for external assessors. SHA welcomes David Miliband's proposal (27 January 2003) that these posts should be abolished. Heads should report their judgements to governing bodies.

### AUTONOMY AND INNOVATION

- 43 Mature organisations manage their own performance indicators and develop their own review processes to monitor progress. As programmes of self-evaluation in schools develop, schools will increasingly look not only at the review processes, but at the underlying performance indicators. The national system has created a small number of crude indicators, which fail to reflect the wider aims articulated by schools in their prospectuses and policy documents. SHA encourages schools to adopt their own performance indicators, in line with their aims and ethos.
- 44 Nationally, SHA believes that broader measures of school performance are required, so that the wider aims of schools are not limited by narrow national performance indicators and targets. Such a system should mature over time, with pilots of new arrangements being tried from time to time.
- 45 This is a step towards the "intelligent accountability" advocated by Onora O'Neill and mentioned by the Minister of State, David Miliband, in speeches in the early part of 2003. SHA defines intelligent accountability as follows:

*Intelligent accountability is a framework to ensure that schools work effectively and efficiently towards both the common good and the fullest development of their pupils. It uses a rich set of data that gives full expression to the strengths and weaknesses of the school in fulfilling the potential of pupils. It combines internal school processes with levels of external monitoring appropriate to the state of development of each individual school.*

- 46 Professor David Hopkins, head of the Standards and Effectiveness Unit at the DfES, said at the seminar on the evaluation of the literacy and numeracy initiatives (27 January 2003):

*Our goal is to improve the quality of teaching and learning throughout the system. We will do this by building capacity and providing flexibility at the front line, backed by an intelligent accountability framework and by targeted intervention to deal with underperformance.*

- 47 The over-accountability of schools in challenging circumstances, discussed above, illustrates the need for a better balance of pressure and support on all schools. The concepts of "light touch inspections", "earned autonomy" and "power to innovate" have little perceptible inter-relationship and there is a clear need for a

better articulation of these attempts to give schools greater responsibility and freedom. In *A New Specialist System* (DfES, 2003), the government broadened these categories of freedom into an aspiration of greater freedom for (almost) all:

*Trusting in the professionalism of the school workforce means giving schools greater scope to achieve the best outcomes for their pupils. We therefore propose significant de-regulation of the secondary system, to generate real freedoms for all schools.*

Achieving that will require the adoption of the measures outlined by SHA in this paper to ensure that greater freedom is accompanied by intelligent accountability, not more of the same. As school leaders, SHA members accept a high degree of professional accountability. That is what drives them to create ever greater educational opportunities for the young people in their care. They can best do this in the context of a school system that encourages innovation, decentralisation and autonomy, balanced by intelligent accountability.

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## SUMMARY OF RECOMMENDATIONS

*In this paper, SHA recommends*

- 1 that the government should review the accountability of schools and examine ways in which a slimmer accountability regime could better support schools in raising achievement and fulfilling their wider aims. (para 1)
- 2 that the government should adopt the notion of intelligent accountability for schools. (para 1)
- 3 that the government should also adopt the notion of intelligent accountability for colleges and should review their accountability structures accordingly. (para 2)
- 4 that intelligent accountability is defined as *a framework to ensure that schools work effectively and efficiently towards both the common good and the fullest development of their pupils. It uses a rich set of data that gives full expression to the strengths and weaknesses of the school in fulfilling the potential of pupils. It combines internal school processes with levels of external monitoring appropriate to the state of development of each individual school.* (para 45)
- 5 that the governors' annual report to parents should be retained, but without the statutory requirements on its contents. (para 5)
- 6 that the requirement to hold an annual meeting for parents should be abolished and the time spent more productively on better ways of engaging with parents. (para 5)
- 7 that new lines of accountability should not be introduced for new initiatives and funding streams and that existing accountability measures should be used. (para 6)
- 8 that the excessively bureaucratic Leadership Incentive Grant Guidance should be scaled down and that normal lines of accountability should be used for the spending of Leadership Incentive Grants. (para 8)
- 9 that all proposed new accountabilities should be vetted by the Implementation Review Unit. (para 9)
- 10 that value added should be used as a performance indicator, based on z-scores as a sound statistical basis for the value added calculation. (para 15)
- 11 that the output measure in such a value added system should not be the proportion of students gaining five A\*-C passes at GCSE, but the average points score of the best eight GCSE results. (para 15)
- 12 that performance indicators for schools should be chosen in a way that minimises perverse incentives, since badly chosen performance indicators warp professional judgements and undermine the professionals making them. (para 16)
- 13 that LEAs should not be required to participate in school target-setting. (para 18)
- 14 that schools should set their own attainment targets in the light of circumstances and the prior attainment of individual cohorts of pupils. (para 18)
- 15 that performance indicators and targets for schools should always be supported by the means for head teachers to deliver them. (para 22)
- 16 that, for schools in challenging circumstances, the "floor target" of 25 per cent GCSE passes at grades A\*-C should be abolished and targets based on value added should be substituted. (para 23)
- 17 that, in line with the recommendation in the Audit Commission report, *Special Educational Needs: A Mainstream Issue*, the government should create new systems for recognising and celebrating schools' work with children who have SEN. (para 25)

- 18 that national performance tables should be abolished and replaced by an obligation on schools to publish examination results and value added statistics locally, thus providing information to parents, prospective parents and the community that the school serves. (para 26)
- 19 where schools and colleges are forming federations or consortia, examination results should be published for the group as a whole and not for the individual institutions. (para 28)
- 20 that QCA should be responsible to Parliament, not to the DfES. (para 29)
- 21 that the government should establish a framework for the national curriculum, which schools should be able to interpret in their local context. (para 30)
- 22 that progress of the education system should be monitored not by the aggregation of individual test results, but by random sampling tests, for which purpose a new body, similar to the Assessment of Performance Unit (APU) should be introduced. (para 32)
- 23 that internal summative assessment should play a greater part in the examination system, with national curriculum tests at 7, 11 and 14, GCSE, AS and A level examinations relying more on internal assessment through the professional judgement of teachers. (para 33)
- 24 that the SHA proposals on Chartered Examiners should be piloted and, if successful, adopted nationally as soon as practicable. (para 35)
- 25 that Ofsted inspections should normally be a validation of the self-evaluation programmes in schools. (para 38)
- 26 that the Ofsted inspection framework should be sufficiently flexible to adapt to the state of development in individual schools. (para 38)
- 27 that, instead of frequent inspections, schools under special measures or in one of the other categories of “failure” should have an agreed programme of external support, with clear roles for external consultants to work with the head teacher on the action plan and the meeting of objectives. (para 39)
- 28 that the amount of external inspection and monitoring of the post-16 work of schools should be drastically reduced, as follows:
- LEA monitoring and LSC quality assurance processes should rely on data from Ofsted inspections and on existing data from the schools themselves.
  - Post-16 (shortly to be 14-19) Ofsted area inspections and LSC strategic area reviews (also to be 14-19) have considerable areas of overlap. LSC strategic area reviews should not impose additional visits or data demands on schools. They should be phased sensibly with Ofsted area inspections.
  - Post-16 inspection and review should be in inverse proportion to the proven quality of an institution.
  - Reviews of post-16 (or, in the future, perhaps post-14) performance should be an interactive process between the school and the LSC. This work should not be duplicated by LEAs. Reviews should occur no more frequently than once per year and should not be box-ticking exercises.
  - Financial audit procedures should be agreed between the LSC, LEAs and heads’ representatives and should be administered by the LEA (from which information could be passed to the LSC). (para 40)
- 29 that a nationally agreed audit process for school funds should be produced. (para 41)

- 30 that external assessor posts should be abolished and that heads should report their pay threshold assessments to their governing bodies. (para 42)
- 31 that schools should adopt their own performance indicators, in line with their aims and ethos. (para 43)
- 32 that broader measures of school performance are required nationally, so that the wider aims of schools are not limited by narrow national performance indicators and targets; such a system should mature over time, with pilots of new arrangements being tried from time to time. (para 44)