Official response to the consultation

School accountability reform – school profiles, improvement, and intervention

April 2025

About Community Union

This is an official response on behalf of members of **Community Union**

Community is a general Trade Union affiliated to the TUC and GFTU. We provide legal and casework support to our members and regularly engage with them in determining our response to policy proposals.

Community's Education and Early Years sector represent thousands of serving teachers and support staff, headteachers, lecturers, nursery and early years workers, nannies and other education professionals in schools and academies, nurseries and early years settings, colleges, and universities across the whole of the UK.

This evidence was submitted to the Department for Education on behalf of our members and as such represents the views of a wide range of individuals from different backgrounds across England and the UK.

The information shared within this response may be used and quoted as appropriate for the purposes it was gathered, with Community Union acknowledged as the contributor. We would be happy to discuss the comments in this response further, please contact us using the details supplied.

This Official Response will be published on our website following the close of the consultation period.

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Question 11: Do you agree that the purpose and principles outlined in Chapter 1 are useful principles for delivering improvements to school accountability?
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)

Community acknowledges that we now have a school system which parents can have confidence in, where children are overwhelming taught in schools graded as good or better (78%) and where schools achieve high standards.

It is important that we understand what we have already achieved and ensure that our language recognises the very real hard work that teachers, leaders, and support staff have put in to realise this. With this in mind, the purposes and principles are broadly the right ones but must be rendered in a way that recognises the above.

We are particularly encouraged by the proposal to encourage collaboration through the system, though we would argue that 'encouragement' is something that comes through the removal of competition. Whilst schools are set against one another and the narrative remains about assessment outcomes then any efforts to 'encourage' collaboration will be unsuccessful and likely lead to other unintended consequences.

Similarly, it is clear from the feedback received as part of Ofsted's Big Listen, that single-word judgements have very little effectiveness and bring little value to school improvement with the lowest support of both schools and parents. Therefore, Community believes that there should be immediate moves to maintain the current interim inspection arrangements whilst a principal based on narrative reporting can be developed.

Question 13: Do you agree a school profile should be the place users can see the most recent performance information, where it is available?
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)

The publication of performance data should always be managed with caution. This is especially the case with data which could be used to identify individuals and breach the data protection regulations. This could be the case even with cohort data should the cohort or sample size be particularly small as is the case in some rural and island schools.

Data pictures can be further confused by the use of multiple different streams – for example, the information collected from statutory tests, and the information collected from internal assessments, registers and observations are all valid but may paint a different picture. They are all a necessary part of the picture.

The same is true of workforce data and finance. Whilst these may be a relevant part of the school picture, depending on how the data is presented it may need significant contextualisation to avoid being misleading. This contextualisation of data, both

performance and wider school data, is likely to drive unsustainable workload for office staff and school leaders and may actually lead to less transparency across the sector.

Finally, data only ever provides a snapshot. This means that pupil performance could have been significantly affected on the day that the data was collected which could influence outcomes. This is why data should always only form a part of the overall picture of school performance.

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)

Community is not convinced that a school profile is the right and proper vehicle for the publication of existing performance data, let alone the sharing of any wider qualitative data.

At present it is not clear who the intended audience is for this amalgamation of data and how will it be presented. This poses difficulties in assessing what it should be and what it should contain. Furthermore, without knowing its purpose it will be difficult to understand how effective the school profile is.

In terms of additional information, Community is particularly against measuring engagement in enrichment since this does not form a part of the curriculum requirements, nor is there a requirement for staff to lead or support enrichment or extra-curricular activities. We feel that this would lead to pressure being placed on staff so that schools could compete in yet another arena, driving workload and wellbeing concerns and contributing to staff leaving the profession.

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)

As noted above, Community is not convinced that a school profile is the right and proper vehicle for the publication of existing performance data or any other school-related data.

At present it is not clear who the intended audience is for this amalgamation of data and how will it be presented and without knowing its purpose it will be difficult to understand how effective the proposal will be.

We would like to see understand the purpose of the profile, including amongst other things, the target audience in order for us to be able to make an informed judgement.

Question 17: Do you agree that a school which is judged by Ofsted to require special measures should normally be subject to structural intervention?
Strongly agree, **agree**, neither agree nor/disagree, disagree, strongly disagree

Please explain your answer (Free text 250 words)

Whilst we agree that some form of structural intervention is necessary, the form of it and the frequency of monitoring does not have to be so firmly defined. Community believe that the best forms of support are those which are negotiated between parties rather than imposed as these lead to buy-in from all parties and are most likely to lead to success.

The starting point for intervention should be derived from the identified areas of weakness through targets for improvement, the support that is available and will be provided and from whom it should come.

Historically interventions have been very heavily imposed with formal leadership change and academisation which has demoralised the workforce and hugely increased workload leading to wellbeing issues. Although school improvement has been achieved, in many instances the same outcomes could have been achieved with a more collaborative and supportive approach.

Finally, monitoring must be proportionate as too much monitoring can lead to lack of progress. This was clearly evidenced by EPI in the report on "Stuck Schools."

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?
Strongly agree, agree, neither agree nor/disagree, **disagree**, strongly disagree

Please explain your answer (Free text 250 words)

As previously mentioned, oft-times interventions have been very heavily imposed with formal leadership change and academisation which has demoralised the workforce and hugely increased workload leading to wellbeing issues without always leading to the best outcomes for pupils.

We acknowledge that the current position is for schools that require significant improvement to be subject to structural intervention, but we also note that schools requiring significant improvement usually have the capacity to drive that improvement themselves.

As part of reducing unnecessary burden on schools we suggest that as with all improvements, the starting point should be to identify targets and that these should be defined and agreed in collaboration, with support available from advisory services etc. as necessary, but that monitoring should be more light touch, and once a school has achieved a particular target, that this is no longer part of the improvement plan.

This will allow schools to thrive in a supportive environment without the need for formal structural intervention but with a parachute should targets fail to be achieved.

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?
Strongly agree, agree, **neither agree nor/disagree**, disagree, strongly disagree

Please explain your answer (Free text 250 words)

In principle, Community is supportive of the proposed RISE teams and the interventions that they will offer, however, it is too early to know what targeted RISE intervention will look like and how this will be deployed at present.

In theory RISE intervention should mean a more local response to school improvement given the regionality of the RISE teams and this will help with understanding the context of the issue and lead to a more bespoke intervention, but exactly what form this will take, who will provide the support and how it will all work together, is not yet clear.

We note that it will not only be the RISE teams that will be providing support. In addition Ofsted will monitor, the RISE teams will review, and the Department may intervene, we fear that this risks there being too many cooks, which will cloud the targets and may lead to confusion in the schools as to how to approach each area of weakness and whether or not they have achieved if there are different expectation from each agent. We also feel that, as already noted, so much agency involvement will lead to too much monitoring which could hamper a schools' ability to make sufficient progress.

Question 20. Do you agree that following the introduction of Ofsted school report cards, we should define stuck schools as set out above?
Strongly agree, agree, **neither agree nor/disagree**, disagree, strongly disagree

Please explain your answer (Free text 250 words)

Community neither agrees nor disagrees with the definition of "stuck schools." We have previously noted that it is appropriate for schools to received support and intervention where there is a clear improvement need and that some schools have the leadership capacity to drive that improvement themselves.

It is also worth noting that pupil outcomes are only one measure of a school's performance and that SEND, inclusion, attendance, deprivation factor and behaviour, all play a significant role.

We also note that there are different reasons why schools are "stuck." Some schools are stuck because of changes to inspection frameworks whilst other are due to reasons of context such as deprivation, small cohorts. Therefore, have concerns that the definition of "stuck schools" risks encompassing a range of different schools in a wide range of different circumstances and yet, treat them all the same.

The whole point of RISE teams is to be able to provide bespoke support. Yet it is unclear how this be achieved and what this will mean for schools identified as in serious weakness or indeed "stuck."

Furthermore, the proposals for Ofsted to introduce report cards remain under consultation and have not been confirmed. Therefore, we are concerned that this question seems to assume a fait accompli. Many organisations have publicly criticised the proposals and the rushed timeframe. We would not wish to see report card inspections pushed out unless they have been properly piloted and the workload impact on schools fully assessed.

Question 21. Do you agree with our proposed intervention approach for stuck schools and that we should amend regulations to give effect to this?
Strongly agree, agree, **neither agree nor/disagree**, disagree, strongly disagree

Please explain your answer (Free text 250 words)

As noted above, the reasons that schools are "stuck" are not always the same and each intervention should be bespoke and tailored to the needs of the school.

The whole point of RISE teams is to be able to provide bespoke support. Yet it is unclear how this be achieved and what this will mean for schools identified as in serious weakness or indeed "stuck."

Community agrees that effective leadership and governance is often critical to delivering high standards across the school, however this does not mean that a "stuck school" automatically requires a new leadership and management team as has sometimes been suggested in the recent past, as this is damaging to morale and harms the relationship between school and community.

There needs to be more clarity around the interventions proposed and the timeframes involved, for example, when is the two-year time frame measured from? And will extensions be available if progress has been made? Finally, as previously noted, who exactly will be the ones determining if progress has been made since both RISE teams and Ofsted may be involved and may use different data and metrics to measure progress.

Question 22. Do you agree that RISE should also engage with schools that have concerning levels of pupil attainment?
Strongly agree, **agree**, neither agree nor/disagree, disagree, strongly disagree

Please explain your answer (Free text 250 words)

Community feel that it _may_ be appropriate for the RISE team to engage with schools who have seen concerning levels amongst pupil attainment if this means that support can be offered, and the issues can be examined and resolved at the lowest possible level. We have seen that the most effective kinds of intervention are those with buy-in from staff, pupils, and the local community as these drive and sustain improvements long after the intervention has completed.

However we do note that in many cases significant swings in pupil outcomes would likely be a data trigger for an inspection.

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)

It is not appropriate for Community to suggest nor recommend appropriate measures and approaches, however we would state that even where a school has seen significant downward change in their results over an extended period of time is not automatically reason to assume that there is a systemic issue, however we acknowledge that this would be an appropriate reason to enquire and investigate.

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?
Please explain your answer, specifying which proposal your response relates to.
(Free text 250 words)

Community has concerns that the proposals for School Profiles and the Ofsted Report card will have a significant workload impact upon support staff – especially those working in administrative and data roles as there would be a need for constant vigilance, checking and challenging data publications to a level not currently expected. Similarly, the workload impact on an already stretched senior leadership team will be significant. These workload issues will be magnified in small schools and those in island and rural areas.

There is also a risk of the publication of data around SEND as this may expose individual pupils, especially around attainment and funding and may place them and their families at risk. This could have a similar risk for those working with vulnerable pupils and those with SEND.

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)

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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)

In addition to our previous comments, there will be workload concerns around any change to inspection and accountability systems. This is why it is critical that a full workload impact assessment is undertaken before any proposals are piloted and rolled out. Even more importantly, proposals must be carefully rolled out so that they have as minimal impact as possible when they are fully implemented.

Community have noted that the Ofsted report card proposals have some merit but that

there are too may areas of concern and the whole process would benefit from more trials and full analysis.

Similarly, the school profile proposal is not yet clear on the intended audience of the profile and therefore we have concerns that if rushed this too may have significant workload implications across the sector.

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)

As previously noted, Community favours a supportive and collaborative approach to school improvement since we feel this provides stability and consistency in the school which, in most instances, is to the benefit of staff and pupils. We do appreciate that there are times when structural intervention will be necessary to secure improvements but that may be different depending on the context of the school, an assessment of the areas to be improved and the capacity of the school leadership to carry out those improvements. Again, wherever possible we would like to see a system that is supportive and not undermining the strengths of the school.

With regards data, the focus on data linked to pupil attainment can be particularly unhelpful and can drive competition amongst local schools which is not helpful for pupils and staff nor parents or community cohesion. Therefore where data is used it must be done carefully to avoid identifying individuals or putting anyone at risk.

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)

Change will always have an impact on workload burdens, but this can be mitigated by well thought out plans that have been trialled and evaluated and be early engagement with stakeholders to identify and minimise unintended consequences. Running pilot projects to assess the impact and the steps taken to mitigate these once they have been identified is a good way to get real-life feedback, but again this takes time. Therefore the proposals from Ofsted and these around accountability change are best achieved through long lead-in times which allow plenty of time for scrutiny and to identify and rectify potential issues.

Once the final proposal; are confirmed, it is useful for schools if exemplar materials can be produced to explain what things may look like for a range of settings and situations, for example, exemplar interventions when a school is judged to be in special measures. This transparency around process will help to lower the stakes of inspection and demystify the process. Similarly, video guides on the proposed school profiles around use, checking and reporting errors would also be helpful.