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Consultation – summary of responses

Proposed changes to Estyn inspection cycle and timings for post-inspection action plans



Date of issue: February 2014

Proposed changes to Estyn inspection cycle and timings for post-inspection action plans

Audience	Governing bodies and headteachers of maintained schools and nursery schools in Wales, further education providers, local authorities and regional education consortia.
Overview	The document provides an analysis of the consultation responses on proposed changes to Estyn's inspection cycle and timings for post-inspection action plans. It also provides the Welsh Government's and Estyn's view on the responses and proposals for change.
Action required	None – for information only.
Further information	Enquiries about this document should be directed to: School Performance Branch Department for Education and Skills Welsh Government Cathays Park Cardiff CF10 3NQ e-mail: SMED1@wales.gsi.gov.uk
Additional copies	This document can be accessed from the Welsh Government's website at www.wales.gov.uk/consultations
Related documents	<i>Proposed changes to Estyn inspection cycle and timings for post-inspection action plans (2013)</i>

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Introduction

The Welsh Government and Estyn have undertaken a series of joint public consultations on:

- the requirement for Estyn to inspect within a set interval from the date of the last inspection;
- the length of those inspection intervals;
- the period notice of inspection given to schools and providers by Estyn;
- the requirement for schools to hold pre-inspection meetings;
- the requirement for parent/carer and learner questionnaires; and
- the time for the preparation of a post inspection action plan.

An electronic public consultation was launched on the Welsh Government website on 6 February 2013 and closed on the 1 May 2013. It was drawn to the attention of schools, pupil referral units, further education, adult community learning, youth support services and work based learning. One hundred and thirty one responses were received to this consultation.

The organisational breakdown of respondents for this consultation was as follows:

Schools	52	39%
Local Authorities	4	3%
Colleges	14	10%
Training Providers	7	5%
Teaching Unions	5	4%
Third Sector/Charity Organisations	4	3%
School Governor	1	1%
Headteacher	1	1%
Deputy Headteacher	1	1%
Education Advisory Service	1	1%
Diocesan Authority	2	2%
Town Council	1	1%
Consortium	1	1%
Catholic Education Service	1	1%
Others	36	27%

The Welsh Government and Estyn carried out a child friendly version of the consultation during February and March 2013. Workshops were held with 196 pupils from 73 primary and 123 secondary schools across North, South and Mid Wales.

The Welsh Government also commissioned the People and Work Unit to carry out a study regarding the Estyn inspection requirements to gain views of groups and individuals who were not educational providers and who were not usually reached through conventional consultation processes. The study used

focus groups and interviewed participants to collect responses. The study collected the views of a range of stakeholders from across Wales within the following six geographical areas – North East Wales, North West Wales, West Wales, the valleys, a city and a rural area.

Given the profile of participants, their knowledge and the framing of questions, much of the discussion focused upon inspections of schools rather than other providers or settings. The number of responses to each question was either counted, or where that was not possible, estimated by facilitators. While the questions posed were simplified in both the People and Work Unit and the child friendly consultation, the context and meaning of the questions were the same.

Analysis has already been carried out on the consultation responses to the People and Work Unit's survey and the child friendly consultation. This paper analyses the responses from the electronic public consultation carried out by Welsh Government and amalgamates it with those of the other two consultation exercises to form an overall analysis of the responses to the questions asked. The Welsh Government's and Estyn's responses to those questions take into account the analyses of all three consultation exercises.

Background

Estyn introduced new inspection arrangements in September 2010 at the start of a six year cycle of inspections (2010-2016) for most providers it inspects. A review of those inspection arrangements was undertaken by Estyn in early 2012 through informal consultation, questionnaires and focus meetings with stakeholders and inspectors. The outcome of the review was generally positive about the current arrangements. The great majority of stakeholders wanted to keep arrangements largely unchanged and there were only a few relatively minor suggestions for improvement.

However, Estyn's review raised two significant issues. The first related to the way schools and other providers were able to predict with some degree of certainty when their inspection was going to happen during the six-year inspection cycle. The second related to the notice period before inspections, where a significant number of stakeholders felt it was desirable to shorten the notice period given to schools and other providers or to have no notice period at all. These two issues are distinct. The first relates to the necessity for Estyn to inspect every school and other providers within six years of their last inspection. The second relates to the length of the period of notice that schools and other providers receive before an inspection (currently 20 working days). A further issue relates to the period schools and other providers have for the preparation of their post inspection action plan.

Overview of consultation responses

There were one hundred and thirty one responses to the electronic public consultation on the Welsh Government website; sixty five participated in the People and Work Unit study; and one hundred and ninety six pupils took part in the child friendly consultation.

There was overwhelming support to reduce the predictability of inspections.

The majority of respondents considered that a 6 year period for inspection was the best option and agreed that the pre-inspection parents' meetings and parent and learner questionnaires should be retained.

Responses were mixed regarding reducing the notice period for inspection and reducing the timeframe for preparation of the post inspection action plan. However, the majority of respondents agreed that there should be a consistent period to prepare post inspection plans for all education sectors and suggested that the current period of time (45 working days) was the most appropriate time.

Summary of responses

Q1. Should legislation be changed so that providers cannot predict when their next inspection is due?

The responses from the **joint public consultation** were:

Agree	Disagree	Neutral	No response
69	47	13	2
52%	36%	10%	2%

Comments

Some respondents provided the following comments:

Agree

Some respondents suggested that as the purpose of inspection was to provide a fair review of delivery, systems and processes, the ability to predict when an inspection was due compromised such judgement. Schools should be seen as they are run on a daily basis, if a school is carrying out good teaching practice this should be seen daily and not just at inspection time and that schools should be ensuring that provision is consistently good at all times. It was suggested that schools should be using self evaluation as a tool for school improvement and not rely on inspection preparation.

It was felt that predictability of inspections may result in some institutions preparing, coaching and possibly staging events that might not have ordinarily been arranged. It was considered that over preparation or being inspection ready was detrimental and increased stress levels amongst staff. Removing that predictability reduced pressure and stress on schools of the build up to inspection.

It was suggested that schools who received a good last inspection report and whose performance data was good should be inspected less often than those whose performance was weaker and that schools should be inspected at short notice.

A reference was made to the inspection cycle in England with a very short notice period, which was considered to provide a more accurate and realistic picture of a school at work. Respondents felt that schools should have their self-evaluation reports ready and updated for inspection at all times and not artificially in preparation for six-yearly inspections. In England inspectors can see these reports within 24 hours notice of inspections under the current Ofsted framework.

Disagree

Respondents that disagreed suggested that an element of preparation and planning was needed to meet inspection criteria and presentation of required documentation. It was felt that knowing the inspection period was useful for schools to plan long term improvements and developments. In response to findings from a previous inspection, schools could plan strategically to make

the necessary improvements and progress in order to demonstrate significant school improvement at the next inspection. A reduction in the notice period for an inspection would not allow providers to plan their development appropriately.

It was suggested that a six year cycle of inspections and notice period was about right and considered to be enough time for recommendations to be fully implemented and consolidated without having the stress of having to be 'inspection ready' all the time. It was suggested that some schools may put off projects and creativity if they felt they could be 'visited' at any time and being able to predict roughly when a school would be inspected did not make much difference, staff want to make some preparations but the data and parents' views are over a long time scale and could not be 'manufactured'.

Some respondents questioned how flexible this would be with the number of schools within Wales and suggested that this would be extremely difficult to manage so that it was equitable. It would result in some schools being inspected more frequently than others. It was also suggested that the constant threat of an imminent inspection would put pressure on teachers and may change their priorities.

One respondent commented that removal of predictability would leave LAs unable to plan their programme of intervention in relation to the inspection cycle and suggests that no notice or unpredictable inspection cycles increase stress as they are in a constant state of readiness.

Additional comments

One respondent raised the question of the purpose of inspection and asked whether it was intended to be supportive, punitive or a quality control exercise. It was also suggested that to change mid cycle seemed to negate this option, if changes were to be made it should start at the next cycle. However others commented that there has been a huge amount of change in education including the nature and breadth of Estyn inspections and providers needed a longer time of stability before any more changes were implemented and suggested that things should be left as they are.

The findings from the study carried out by the **People and Work Unit** were overwhelmingly in favour of changing the legislation so that schools could not predict when their next inspection was due.

Comments

Agree

Participants who agreed that legislation should be changed suggested that it would stop schools from putting on a show for inspectors and inspections should inspect the day to day reality of the school. It was also suggested that it would reduce school staff's anxiety when preparing for inspections, encourage schools to be ready for inspection at any time and that a six year inspection cycle was too long.

Disagree

Participants that disagreed suggested there was no need to change provided school self evaluation was done well and the current cycle, despite some weaknesses, worked well.

The responses from the **child friendly consultation** were:

Agree	Disagree	Neutral	No response
105	45	36	10
54%	23%	18%	5%

Comments

The following are a sample of comments from pupils:

Agree

- If the school could guess (when an inspection was due) it could prepare well in advance to make it better which would not be fair on other schools.
- School would be always at its best.
- So that the schools haven't got a specific time that they know it is being inspected (that schools are seen as they are on a daily basis).

Disagree

If the school does not know when the inspectors are coming when they arrive everyone will be stressed.

We are such a good school we're prepared for anything.

Changing inspection times would be unfair.

It would not be fair to change the 6 year rule because if the inspectors come without us knowing and some teachers are not here it may look bad on the school.

Additional comments

Pupils also commented that inspections are stressful not just for teachers but for students too; sensitive students can get very stressed because their education depends on inspections; inspections are important and parents need to know about their children's educations but if the teachers know about the inspections sooner they can put more pressure on the children .

Conclusion – the majority of respondents from all three of the consultation exercises agreed that the legislation should be changed to prevent schools and other providers predicting when their next inspection was due.

Welsh Government response – Estyn inspections should be seen as supporting improvement processes and an opportunity for providers to assess their own self-evaluation and development. Inspection should not be a one off event that involves an excessive amount of preparation; schools should be

performing to the same levels consistently. Inspections should see schools as they are on a day to day basis. The Welsh Government supports the view that, as far as possible, inspections should not be capable of being predicted and considers that the current Regulations should be amended.

Estyn’s response – Estyn agrees that the Regulations should be amended to limit predictability and welcomes the support for that change.

Proposal – the Welsh Government proposes to amend the existing Regulations to remove the link between past and forthcoming inspections and to require every education and training provider to be inspected at least once in every six year period commencing 1 September 2014.

Q2. What in your opinion is the best length of time within which all providers should be inspected at least once?

The responses from the **joint public consultation** were:

6 yrs	6-7yrs	7 yrs	8 yrs	9 yrs	3- 5 yrs	No resp
92	1	9	7	8	1	13
70%	1%	7%	5%	6%	1%	10%

Comments

6 years

The current cycle works, is a reasonable time period, ensures that providers maintain and continuously improve the quality of learning, and allows time for progress between cycles. It was felt that regular inspections were necessary and any longer would see a potential slip in standards. Respondents suggested that 6 years allowed providers to plan effectively to effect change and development. However, it was suggested that key subject areas could be inspected more frequently.

Respondents also felt that 6 years was acceptable as it meant a school would be inspected at least once during a child's education in that establishment.

Some commented that 6 years was already a long time between inspections, a report was long out of date by the time the next one was written and suggested that to go beyond 6 years could possibly allow weak or failing schools to go unchallenged for an unreasonably long time. Extending the time might lead to schools having problems being left to their own devices for too long with a resultant fall in standards and quality.

It was suggested that all providers were inspected within a 6 year period, but that there should be flexibility to inspect more than once in a 6 year cycle if standards dropped. It was felt there needed to be more focus on those schools that were a cause for concern. It was suggested that those providers that perform well should be inspected less frequently unless special circumstances arise such as unexplained changes in performance.

Respondents also suggested that consideration could be given to Estyn completing a more formal quality assurance visit each year, perhaps linked to their self assessment cycle, by a Link Inspector which informs when the next inspection is needed, or a “formalised meeting/review” with a Link Inspector throughout the intervening period regardless of outcome of previous inspection. This may result in some providers being inspected less/more often than others. More frequent thematic inspections would also be useful and welcome.

6-7 years

The sole respondent proposed that Remit inspections should be more frequent allowing Estyn to monitor between formal inspections and to alert the relevant local authority where a cause for concern was detected. An alternative to having a set interval between inspections would be for the Inspector to decide an appropriate timescale with the Inspection Report indicating the timescale for the next inspection (a high performing school would have a longer time frame between inspections than an underperforming school).

7 years

One respondent considered that once in a cycle of a child’s education should be the maximum time a school should be inspected but if a school’s data was showing a dip in performance over time, Estyn should have the freedom to revisit more frequently.

8 years

One respondent thought it allowed greater flexibility in the inspection system. It was also suggested that as primary school children usually have seven years of full-time education and a year of part-time nursery education, and secondary learners have between five and seven years in school, an eight-year period seemed sensible and guaranteed reports within a child's time at the school, or within a reasonable period beforehand.

9 years

One respondent suggested that if less warning was given and providers did not know when they would be inspected, more years would be needed to run things correctly. It was also suggested that excellent and good schools should be inspected within 9 or even 10 years.

Additional comments

Other respondents suggested that a six year period was too long, it could be possible for a school to be unsatisfactory for the entire time that a pupil was educated there. The same could apply where a school was deemed excellent, they could spend the next five years being complacent.

Other timescales have been suggested – 6 months (for low performing schools), a 3 year minimum, 3-4 years (light touch with a follow up visit if needed), a 4 year cycle, within 4 years when a new headteacher was appointed, 4-6 years, 5 years, or a 6-8 year sliding scale.

One respondent asked whether it was possible to have different models of inspection so that some schools at risk could be checked through unannounced inspections. Or to inspect at different times, for example – if a provider scored an unsatisfactory/satisfactory grade, then a re-inspection within the year should be available. It was suggested that there should be interim inspections, with a review a year after an inspection as a minimum to check on progress on action plans and consideration of re-inspection given to those training providers that would wish to improve their grade.

Another respondent felt that the four regional consortia, given their responsibility for monitoring and challenging schools, could be making judgements on the quality of schools' self-evaluation and from agreed performance data and their knowledge of the schools make judgements on their performance. On this basis, it ought to be possible to inspect schools in inverse proportion to success, provided there is proper consultation with stakeholders as to what the data used to monitor school performance should be and what would be the trigger points for inspection visits. Then there would not effectively need to be an inspection cycle.

Others commented that the framework for inspection needed to remain constant so that schools had chance to implement requirements before starting again on a new cycle with a changed framework. An option could be to publish a new framework and give a 12 month lead in time before the start of the inspection cycle so that institutions can adapt their provision if needed before judgements are made.

The findings from the study carried out by the **People and Work Unit** were that over three quarters of participants thought that schools should be inspected within 6 years. Less than a quarter thought that schools should be inspected within 7 to 8 years.

Comments

Some participants provided the following comments:

Participants who felt that schools should be inspected **more frequently than once every 6 years** suggested that school staff would get used to inspections and it would become a natural way of working. They felt that if inspections adopted a lighter touch approach, school inspection reports would be current or up to date and ensure quality but also recognised that for inspections to be occur more frequently would require greater resources.

Some participants also suggested that school data did not provide a complete picture and could be misleading, that local authorities or Consortia could inspect if Estyn lacked capacity (helping the relationship between schools and authorities), that Estyn needed to visit good schools to gather examples of good practice and to have more regular inspections of primary schools as it was felt that primary schools' data was less reliable than secondary schools' data.

Participants who felt that some schools **should be inspected over a longer cycle (typically 7-8 years)** commented that it depended on performance of the school (for example, a high performing school did not need to be inspected as frequently), self evaluation in schools was improving and that school annual reports should be surveyed each year.

The responses from the **child friendly consultation** were:

6 years	7 years	8 years	9 years	Other	No resp
77	25	5	3	73	13
39%	13%	3%	1%	37%	7%

Of those pupils who wrote 'other', 4 suggested 1 year, 1 suggested 1.5 years, 12 suggested 2 years, 10 suggested 3 years, 9 suggested 4 years, 4 suggested 5 years and 3 suggested that it should be random.

Comments

The following are a sample of comments from pupils:

- Any longer than 6 years would be too long, I think 4 years is better.
- I think the school should be inspected in a random amount of years.
- I think within 6 years because a lot of things change in school within a short time.
- I think every 4 years.
- Every 2 years because they can see if our school is running well.

Conclusion – the majority of respondents from all three consultation exercises considered a 6 year inspection period to be the best option, with some also suggesting that the system be flexible enough to allow schools performing well to be inspected less often than those not performing so well.

Welsh Government response – the Welsh Government recognises that a requirement to inspect within 6 years from the last inspection allows some providers to predict when their next inspection is due. The Welsh Government supports reducing the predictability of inspections within the current system. To achieve this, the Welsh Government considers that the requirement to conduct an inspection within 6 years of the last inspection should be removed, that the length of each inspection period should remain at 6 years; and that a new 6 year period of inspections commences on 1 September 2014.

Estyn's response – Estyn is content with the retention of a 6 year inspection period and the commencement date of the new 6 year period. A longer inspection period would have released resources to allow Estyn to inspect providers who are not performing well enough more often.

Proposal – the Welsh Government proposes to amend the existing Regulations to remove the link between past and forthcoming inspections and

to require that every school and provider will be inspected at least once in every six year period commencing 1 September 2014.

Q3. Should Estyn retain the pre-inspection parents' meeting as part of school inspections?

The responses from the **joint public consultation** were:

Agree	Disagree	Neutral	No response
55	36	29	11
42%	28%	22%	8%

Comments

Some respondents provided the following comments:

Agree

Respondents that agreed that the pre-inspection parents' meeting should be retained suggested that parents' views were valid, they should have the opportunity to meet with inspectors and express their views collectively or individually. It was suggested that Inspectors got a better feel for the school and flavour of responses when meeting parents face to face, questionnaires were deemed less useful than a meeting. One respondent commented that (in her school) many of the parents were illiterate and the loss of this meeting would mean that their voices were not heard. The use of the bi-lingual Somali assistant at the parents meeting in a recent inspection ensured that this community was able to play a full and active part in the inspection. They would otherwise not have engaged in the process.

Disagree

Respondents that felt that the parents' pre-inspection meeting should not be retained felt that generally the meetings were not well attended and participation was poor. When the meetings were attended, parents were often inhibited by the presence of governors and teachers who were also parents, or, the sample of attendees may not have been representative of all parents. It was suggested that quite often parents attend when they have an issue to air and those parents who were happy with school did not always believe that they needed to attend. Subsequently, this could portray a skewed general opinion of the school. It was suggested that the comments parents make in the questionnaires in confidence were often far more valuable.

Additional Comments

Other respondents felt that there were other ways of gathering information from parents (questionnaires) but there should also be a more obvious, open and anonymous way for parents to voice any concerns with the Estyn. One respondent suggested that if schools were 'open' with parents and were sharing information and judgements made by System Leaders, then there should be no need for pre inspection meetings.

The findings from the study carried out by the **People and Work Unit** were that around two thirds of participants believe that Estyn should retain the pre-inspection parents' meeting.

Comments

Agree

Participants who were in favour of retaining the pre-inspection parents' meeting commented that some parents may not feel at ease filling in questionnaires so would need face to face meetings and suggested that the meetings needed to be promoted so more parents attended. Others suggested that the meetings were important but consideration should be given to having a 'nominated lead parent' to speak on behalf of people. It was felt that teachers who were parents should not attend and that four weeks notice was not needed, one week was sufficient.

Disagree

Participants who commented that the parents' meetings were not needed suggested that only certain kinds of parents attended the meetings so they were not representative. It was felt that there was little point if attendance was poor and Estyn should consider other ways of engaging and consulting parents.

The responses from the **child friendly consultation** were:

Agree	Disagree	Neutral	No Response
101	28	62	14
49%	14%	30%	7%

Comments

The following are a sample of comments provided by pupils:

- I don't know if they should be at the meetings.
- Yes because the parents should know how the school is going.
- I think yes because our parents will know what is happening in our school.
- Yes so inspectors can get more opinions.
- If there are problems they need to be able to ask.
- Parents deserve the right to know what's going on within their child's school.

Conclusion – Of those that have an opinion, most of the respondents from all three consultation exercises agreed that Estyn should retain the pre-inspection parents' meeting.

Welsh Government response – the Welsh Government favours retaining the parents’ meetings but welcomes Estyn’s views on the matter.

Estyn’s response – The pre-inspection information Estyn receives from parents’ questionnaires provides important evidence in deciding the lines of enquiry for the inspection. Parents’ meetings add little to the information gained from parents’ questionnaires. Parents’ attendance at the meetings is often low and some parents find it difficult to be open about their experiences of the school because they feel that other parents or teachers or parent governors with children at the same school will repeat to the school any critical comments they make.

Proposal – the Welsh Government proposes to retain the pre-inspection parents’ meeting. Current Regulations state that schools must take such steps as are reasonably practicable to provide parents with at least 3 weeks notice of time and place of the meeting. However, this provision is an obstacle to Estyn reducing their notice period for inspection to take place. Whilst the pre-inspection parents’ meeting will remain, the Welsh Government will consider amending Regulations to reduce and/or remove the 3 week notice period. Welsh Government will explore the feasibility of, in the future, removing the requirement to arrange for the meeting to take place before the time when the inspection is to begin.

Q4. Should Estyn retain its own parent and learner questionnaires?

The responses from the **joint public consultation** were:

Agree	Disagree	Neutral	No response
83	19	20	9
63%	15%	15%	7%

Comments

Some respondents provided the following comments:

Agree

Respondents that agreed that Estyn should retain its own parent and learner questionnaires felt that it was an important part of the inspection. It was vital to get the views of learners and parents. They considered it was an important supplement to the meeting with parents and conversations with pupils (as pupils often raise issues not mentioned in the school’s SER on behaviour) and may be the only information they receive from parents if they cannot attend the pre-inspection parents’ meeting. Respondents commented that the responses within the questionnaires were more honest because they were confidential and information within them was invaluable as evidence and useful when deciding what questions to ask or what to observe within the school.

Some respondents suggested that the questionnaires could be on-line so they are more accessible (they are offered both electronically and in paper format), that some of the children’s questions could be clearer and questionnaires

could be completed routinely at the end of each school year so that there was no need to do them immediately before an inspection.

Some respondents commented that the comparative data which is available nationally was particularly useful and the standardised approach ensured that the questionnaires were statistically valid. It was suggested that the questionnaires could possibly be developed as something which schools could use routinely as part of their on-going self-evaluation and still compare to a national benchmark.

Some respondents expressed that they would welcome feedback on the outcomes of the Parent and Learner Questionnaires, especially in order to see how it informs the inspection result (respondents might not be aware, but, Appendix 2 of inspection reports summarises responses to parent and pupil questionnaires).

One respondent suggested that schools need to be discouraged from sending out the Estyn questionnaire prior to an inspection for their own information, as this often confuses parents and discourages them from completing the official pre-inspection questionnaire.

Disagree

Respondents that disagreed suggested that Estyn should be asking schools/authorities to collate their own data regarding pupils' educational wellbeing as they should be demonstrating their own ability to constantly evaluate the views of parents and learners. It was suggested by one respondent that the questionnaires rarely offered useful insights and have little impact on either the inspection process or outcomes and that the parental meetings and discussion with learners were of more benefit.

Respondents from FE colleges highlighted that DfES undertakes the annual "Learner Voice" survey across all post 16 institutions and suggested that this should give Estyn the information it needed prior to inspection, benchmarked across all other institutions in the sector. It was suggested that when institutions undertook their own SPOC surveys, the DfES Learner Voice and an Estyn survey, there was a danger that learners were "questionnaired out" with too many similar questionnaires in a short space of time. Also, if the intention was to move to a shorter notice period for inspections, the processes of getting surveys in place was an onerous one when evidence already existed. However, it was recognised that in other sectors, such as schools, they might not have the same degree of feedback from their learners and stakeholders. In these cases Estyn may well see the need for a separate questionnaire.

Additional Comments

Some respondents commented that the framework should include a requirement for schools to have their own parent and learner questionnaires in place and to analyse the results in a standard way.

Other comments were that learner questionnaires needed to be intensified for impact and specialised to individual groups to ensure accessibility. One respondent highlighted a concern regarding the parent questionnaire, suggesting that it was often only completed if there was a negative response so not always true reflection.

One respondent suggested that Estyn should look at canvassing the views of teachers in the school regarding a number of issues such as support from parents/carers, the wellbeing of staff and leadership and management of the school. It may provide some very interesting information for Estyn to help schools.

The findings from the study carried out by the **People and Work Unit** were that a large majority of participants felt that Estyn should retain the questionnaires.

Comments

Agree

Participants that agreed that the questionnaires should be retained suggested that there was a risk that questionnaires administered by schools could be biased, the Estyn questionnaires provided a standardised format, they were important but the language needed to be simplified and they needed to be given more 'weight' in the actual analysis and reporting stage.

Disagree

Participants who disagreed suggested that it did not fit with giving no or little notice of an inspection, Estyn could use school questionnaires, it was difficult to get good data from questionnaires, schools should do the questionnaires but Estyn should provide administrative support and that many of the questions were closed and didn't allow for a wide range of options.

The responses from the **child friendly consultation** were:

Agree	Disagree	Neutral	No response
101	16	67	12
52%	8%	34%	6%

Comments

The following are a sample of comments provided by pupils:

- Yes because some kids won't want to say their opinion out loud.
- Yes because then the government know.
- Yes because then they can't cheat.
- Yes to see if they are good.
- Yes keep them.

- No I think they should just ask the questions.

Conclusion – the majority of respondents from all three consultation exercises agreed that Estyn should retain parent and learner questionnaires.

Welsh Government Response – whilst the questionnaires take time to distribute it is evident from the comments received that the questionnaires are considered an important and valuable part of the inspection process. They are particularly seen as important in providing an opportunity to gather confidential views from parents and learners about education providers. They also provide Estyn with a way of benchmarking responses and a benchmark for judging those responses. The Welsh Government agrees that it is useful for providers to conduct their own parent and learner questionnaires for self evaluation purposes (the Learner Voice within post 16 education provides a vehicle for that) but does not feel that it is necessary to introduce a mandatory requirement for schools to do so. The Welsh Government recommends that the questionnaires are retained.

Estyn's response – Estyn agrees with the majority of respondents who feel that it is appropriate for Estyn to retain its own parent and learner questionnaires.

Proposal – Estyn intends to retain the use of questionnaires.

Q5. Should the notice period for inspection be reduced from the current 20 working days? If so, how much notice should be given?

The responses from the **joint public consultation** were:

20 wd	15 wd	10 wd	5 wd	3-4 wd	1-2 wd	none	No res
65	5	16	14	5	7	8	10
50%	4%	12%	11%	4%	5%	6%	8%

Comments

Some respondents provided the following comments:

Current 20 working days

Respondent who felt that the current notice period of 20 days should remain suggested that it was about the right timescale as there was a lot of preparation involved and pre-inspection data required. It also allowed time for communicating with parents/carers and governors. It was suggested that a reduction in days may affect the quality/quantity of the data and increase staff stress during inspection time.

One respondent suggested that this period provided an opportunity to discuss with the reporting inspector the outline of the programme for inspection, to provide information such as a recent self-evaluation report and improvement plan and details of the timetable for the period of the inspection. It also allowed schools with an opportunity to improve their practices before the inspection took place.

15 working days

A respondent who felt that the notice period could be reduced to 15 working days suggested it would allow time to organise a meeting with parents. However, the notice period for inspection becomes less important if the six-year cycle for inspections was maintained.

10 working days

Respondents who felt that the notice period could be reduced to 10 working days suggested that this was an adequate amount of time to ensure that the appropriate arrangements were put in place, activities that were planned such as staff inset and trips were accounted for and it allowed the provider sufficient time for preparation for the inspection. Respondents suggested that there should be a pilot test of the use of a 10 day notice period as a precursor to a final decision and if the notice period was reduced, Estyn would have to adjust its expectations.

One respondent suggested that whilst there was scope for the period of notice to be reduced to 10 working days, there would need to be sufficient time for the school to make appropriate arrangements to accommodate the inspection safely, that there would be consequences for the return of parental questionnaires and LA pre-inspection commentaries, but it would reinforce the need for schools to be effective and “inspection ready” at any time.

5 working days

Respondents who felt that the notice period should be reduced to 5 working days suggested that notice periods should be less predictable and schools should be inspected based on how they function on a normal day to day basis. It was suggested that this timescale would allow teaching staff to prepare lessons thoroughly for the following week, any longer and leadership teams would pressure staff to gather evidence and schools should not intensely prepare for inspection.

Whilst respondents support moving to a shorter notice period, it was suggested that the notice period needed to take into account the length of time the questionnaire process takes and logistical challenges faced by large consortia and also large multi sited and geographically dispersed providers.

3-4 working days

A respondent who felt that the notice period should be reduced to 3-4 working days commented that classroom displays should be seen as they normally are, and documentation as it always is. A self-evaluation report should be a ‘work in progress’ at all times, subject to updates as changes occur. Another respondent felt that this timescale was sufficient notice for key staff to be available.

1-2 working days

A respondent suggested that notification the previous day was enough time to ensure the headteacher was in school and available for inspection. Another respondent suggested that it might be possible to have different models for different providers depending on the risk assessments of those providers and unannounced inspections on some occasions.

None

One respondent commented that if we look at pupils and parents as customers, we must try to ensure that inspectors are seeing a snapshot, as far as is possible, of the way things really are on a day to day basis. Some people feel that no notice is too tricky as leaders might not be in school. However, if an organisation is well led, things carry on whether or not the top people are present. Whilst another respondent agrees with this, they feel it was not practical.

Additional comments

Other respondents suggested different timescales. One suggested a maximum of 7 days notice, whilst another suggested two terms would be better to take account of trips and events.

One respondent suggested that the notice period could be reduced but it would require significant changes to the inspection methodology (including the deployment of peer inspectors).

Another respondent welcomed a reduction in the current notice period and suggested that the impact of reducing the notice period on certain aspects of the current inspection arrangements could be mitigated by ongoing assessment and better engagement with parents/carers. A reduction in the notice period would reduce stress on teachers and create the most accurate picture of the standards of education offered by a provider. The current notice period distorts that picture, with schools rushing to create short term interventions that will not necessarily bring about the required improvements in the long term. Instead, schools should be encouraged to use data, collected through formative assessments and surveys, to monitor their progress over the longer term. This will allow schools to make interventions which are more effective and sustainable.

One respondent suggested that the context of each sector should be considered deciding the notification timescale and refers to Ofsted who has not adopted a 'one size fits all' approach across all sectors as there is recognition that slightly more time may be appropriate in some sectors to reflect the challenges faced by consortia and larger scale organisations as compared to much smaller providers.

The findings from the study carried out by the **People and Work Unit** were mixed. Around three quarters of participants felt that the notice period should be reduced (with most favouring no notice inspections) whilst the other quarter felt that there should be no change.

Comments

Current 20 working days

Participants who felt that there should be no change to the current 20 day notice period suggested that it largely depended on the amount of material and preparation Estyn demanded from a school in advance of an inspection, that it took time to prepare for inspections and there were practical problems to reducing the timescale such as pupils being on trips who subsequently would not be able to contribute.

10-19 working days

The small number of participants who felt that the notice period should be reduced to between 10-19 working days suggested that Estyn needs some time to collect information beforehand, if schools had the right processes in place and teachers were doing their work properly, they don't need much time to prepare.

5-9 working days

The small number of participants who felt the notice period should be reduced to between 5-9 working days suggested that inspections should see the school as it is usually, some notice was needed so that governors could contribute and if schools have the right processes in place they don't need that much time.

1-4 working days

The small number of participants who felt the notice period should be reduced to between 1-4 working days suggested that it was better to have a regular, light touch inspection visit and collect information after the visit.

No notice

Participants who felt that no notice should be given felt that it showed the reality on the ground, Estyn inspections expect a 'show', Estyn needed to be more realistic, it places less pressure upon teachers, events such as concerts have been cancelled as a result of inspections and inspections have potential to improve on-going monitoring and evaluation.

Additional comments

Some participants commented that there was a need to separate inspection visits – to see how a school is delivering learning and to inspect data and structures. It was felt that the purpose of an inspection visit needed to be clear and develop the regime to meet those purposes.

The responses from the **child friendly consultation** were:

20 wd	15 wd	10 wd	5 wd	3-4 wd	1-2 wd	none	other	No res
28	18	24	12	8	8	20	8	12
20%	13%	17%	9%	6%	6%	14%	6%	9%

Comments:

The following are a sample of comments provided by pupils:

- Spot inspections that way no one can prepare or get stressed.
- 1 or 2 days because then they won't over prepare.
- Keep it 20 so we could have time to sort everything out.
- 10 days – so that they have a fair amount of time.
- 10 days – it will give them less time to stress.
- 10 days – because I think they should give a bit of notice but not too much.
- No notice – The Estyn people need to see the school as it is but the teachers will make it better.
- No notice – because they can see them on a daily basis.

Conclusion – the majority of respondents to the electronic public consultation launched by Welsh Government consider that the current notice period was sufficient. The responses to the other two consultation exercises were mixed.

Welsh Government response – there are a range of issues surrounding changing the notice period. If the current arrangements for notification of the pre-inspection parents' meeting are retained the options for reducing the notice period are not feasible. If predictability of inspections is removed, 20 working days is not too long for a provider to over-prepare for inspection. The Welsh Government will be informed by Estyn's view of the value of the pre-inspection parents' meetings and also by the practical realities of operationally implementing a shorter notice period. The Welsh Government welcomes Estyn's view on the matter.

Estyn's response – Estyn acknowledges that by reducing the predictability of inspections, shortening the length of the notice period becomes less of a priority. The notice period for inspections is not currently set out in legislation or regulation. It is likely that Estyn will pilot a reduced notice period.

Proposal – the Welsh Government will consider amending the existing Regulations requiring schools to provide 3 weeks notice for the pre-inspection parents meeting; the outcome of that will influence whether Estyn wishes to reduce its inspection notice period.

Q6. Should the time frame for the preparation of a post-inspection action plan be reduced from the current arrangements for the schools sector?

The responses from the **joint public consultation** were:

Agree	Disagree	Neutral	No response
39	35	45	12
30%	27%	34%	9%

Comments

Some respondents provided the following comments:

Agree

Respondents that agreed that the time frame should be reduced have commented that matters needed to be addressed quickly, the longer it takes to produce reports the longer it takes to make improvements. If school improvement is about pace for change, then a reduction in timeframe would emphasise the importance of change being made at pace. It was suggested that the timeframe should be reduced for those schools in special measures.

One respondent suggested that the senior staff and governors should be able to prepare a plan in sufficient detail within 4 weeks. Another commented that schools were fully aware of the recommendations arising from an inspection in the oral feedback so they have ample time to be formulating an action plan while they await publication of the report.

Disagree

Respondents that disagreed felt that schools should have adequate time to consider the findings of the inspection, a post inspection plan should not be rushed, time was needed to assess the outcomes and plan carefully to address them. Shortening the time would add pressure and may result in inferior plans being put together and submitted. Schools may need to re-focus and this may include training, shortening timescales would add pressure.

Others have suggested that maybe the timeframe should be determined by the Inspectors and timescales would depend upon when in the academic year the school is inspected – a school would be able to respond more quickly when planning for a new academic year.

One respondent suggested that an additional INSET day should be given to a school that has been inspected to allow staff to generate ideas about how to address the issues and move the school forward. Another suggested that it was important for institutions, especially the ones that are a cause for concern to get the opportunity to plan carefully, including meeting governors and possibly consider changes in leadership and intervention.

Additional Comments

Other respondents commented that they would be reluctant to rush a post-inspection action plan, understanding the significance of that document. Timescales depended upon the outcome of the inspection. Schools placed into a category will require more time than those who receive a good or excellent report

The findings from the study carried out by the **People and Work Unit** were that the majority of participants felt that the time for preparation for the post inspection action plan should not be changed.

Comments

Agree

The small number of participants who agreed that the time frame should be reduced commented that if schools had the right processes in place, not much time was needed and the current timeframe was excessive.

Disagree

The participants who disagreed that the time frame should be reduced commented that it was important that people have time to get the plan right, it takes time to get all relevant stakeholders together to agree the plan, the length of time needed depended on the nature and number of points raised by Estyn so flexibility was needed and governors have limited time to participate.

The responses from the **child friendly consultation** were:

Agree	Disagree	Neutral	No response
73	29	80	14
37%	15%	41%	7%

Comments

The following are a sample of comments provided by pupils:

Agree

- Instead of 80 days it should be less e.g. 25-40 days.
- Make it shorter.
- It takes about 3 months and the problem might be getting worse.
- So that schools can get better quicker.
- It should be reduced from 80 days to one month.
- I think it's too long.

Disagree

- The longer it takes the better it will be.
- Because it's fine.

Additional Comments

- I don't know what goes on in that side of things but the way it seems now seems OK.

Conclusion – the responses are very mixed. Within the public consultation, 30% of respondents agreed to a reduction to the time frame, 27% disagreed and 43% were neutral or did not respond, whilst within the child friendly consultation, 37% agreed but 48% were neutral or did not respond. However, the majority of participants from the People and Work Unit survey felt that the time for preparation for the post inspection action plan should not be changed.

Welsh Government response – there is no clear view on whether a reduction in the time for preparing post inspection action plans is warranted. The argument for reducing the timeframe is that as a member of the provider’s staff is a nominee during the inspection, he or she participates in the process and will have a clear view of the issues. The nominee and others from the provider’s management team will also attend the feedback sessions following the inspection where the provisional assessments are given. This allows the school or provider to begin planning the action to be taken to address the assessments made immediately following the inspection and before the inspection report is issued. In respect of poor performing schools, action should be taken with pace and rigour immediately following inspection.

The Welsh Government supports a reduction in the timeframe for the preparation of the post inspection action plans. While the Welsh Government would not want the period set to be punitive for any school, it considers that a reduction in the timeframe will enable action to be taken at the earliest opportunity. The Welsh Government recommends that a reduction to 20 working days is sufficient.

Estyn’s response – Estyn does not have a strong view on this question but is content with reducing the timescales for providers to prepare post-inspection action plans.

Proposal – the Welsh Government proposes to amend existing Regulations to reduce the timeframe for production of a post inspection action plan to 20 working days.

Q7. Should a consistent period of time be applied to all education sectors in respect of preparing a post-inspection action plan?

The responses from the **joint public consultation** were:

Agree	Disagree	Neutral	No response
82	8	30	11
63%	6%	23%	8%

Comments

Some respondents provided the following comments:

Agree

Most respondents that agreed did not provide any comments. However those that did, felt that consistency was important, all education sectors should be treated the same and work to the same timescales as this is a Common Inspection Framework. It was suggested that the inspection system must be transparent and fair otherwise the profession would lose faith and distrust the inspection team.

Disagree

Respondents that disagreed suggested that schools’ inspection recommendations may vary greatly and therefore require variable timescales

in which to prepare a post inspection action plan. Schools with ‘issues’ may require more time and a larger secondary school would need more time than a small primary school to review recommendations, gather ideas and formulate their action plan.

The findings from the study carried out by the **People and Work Unit** were that almost half of participants did not know whether there should be a consistent period of time applied to all education sectors to prepare a post inspection plan. However, over a quarter agreed that the time should be consistent.

Comments

Agree

Participants who felt that the period of time should be consistent suggested that it made sense that education providers are treated in a standardised way, differences over-complicate systems and it would help to promote monitoring and evaluation processes of a similar standard across all sectors which is currently lacking.

Disagree

Participants that felt that the period of time did not have to be consistent for all providers to prepare their post-inspection action plan commented that sectors were different with different issues so couldn’t be treated the same.

The responses from the **child friendly consultation** were:

Agree	Disagree	Neutral	No response
108	25	47	16
55%	13%	24%	8%

Comments

The following are a sample of comments provided by pupils:

- Just because they are older doesn’t mean they should have more time.
- We should all have the same time.
- We should all have the same time.
- Because it would then be fair.

Conclusion – the majority of respondents from the electronic public consultation launched by Welsh Government and over half (55%) of respondents to the child friendly consultation agreed that there should be a consistent period of time applied to all education sectors when preparing a post-inspection action plan. However, only just over a quarter of participants to the People and Work Unit survey agreed whilst almost a half of participants did not have a view either way.

Welsh Government response – there is no reason why consistency cannot be applied across all sectors. There appears to be a strong case to suggest that sectors should be treated equally. The Welsh Government recommends that a consistent period of time is applied to all education sectors to prepare a post inspection action plan.

Estyn’s response – Estyn does not hold a strong view in relation to this question but is broadly in favour of consistency.

Proposal – the Welsh Government will consider the best way to proceed regarding this issue.

Q8. What is the most appropriate period of time for all providers to have to prepare their post-inspection action plans?

The responses from the **joint public consultation** were:

45 wd (no change)	15 wd	10 wd	5 wd	other	No response
60	34	10	5	7	15
46%	26%	8%	4%	5%	11%

Some respondents suggested other timescales, 1 suggested 20 working days, 1 suggested 20-25 working days, 1 suggested 20-30 working days, 3 suggested 30 working days and 1 suggested one term.

Comments

Not many comments were provided but of those that did, the main suggestion was that the timeframe should be variable, according to the outcome of the inspection. Schools requiring significant improvement or special measures are likely to require the support of local authority/consortium officers

The findings from the study carried out by the **People and Work Unit** were that the majority of respondents felt there should be no change in the time allowed (45 working days) for preparation of post inspection action plans.

Comments

No change – 45 days

Participants who felt the current period should not be changed commented that it took time to produce a good action plan, took time for stakeholders to reach a consensus and that governors have limited time (to participate) as many were in employment and volunteer their own time.

Reduce to either between 15-25 days or 5-14 days

The small number of participants who felt that the current period for preparation of action plans should be cut to either 15-25 or 5-14 days suggested that there was a need for faster action once problems were identified, the action was more important than the plan and that there could be a negative impact of a protracted period of planning upon school morale.

The responses from the **child friendly consultation** were:

45 wd (no change)	15 wd	10 wd	5 wd	other	No response
84	43	11	8	28	16
44%	23%	6%	4%	15%	8%

Comments:

The following are a sample of comments provided by pupils:

- 45 days seems OK. (Mid Wales)
- 30 days. (South Wales)
- 35 days. (South Wales)
- I think it should be reduced to 20 days. (South Wales)
- I think it shouldn't be that long. (South Wales)
- I think it should be the shortest notice as possible. (Mid Wales)
- Keep it 45 days. (North Wales)

Conclusion – overall, the majority of respondents from all three consultation exercises suggested that the current period of time (45 working days) was the most appropriate period of time for providers to prepare their post-inspection action plans.

Welsh Government response – this is inconsistent with the responses to question 6 where responses were very mixed. See the Welsh Government response to question 6 outlining the argument for reducing the timeframe. The Welsh Government supports a reduction in the timeframe to enable action to be taken at the earliest opportunity and therefore recommends that a reduction to 20 working days is sufficient.

Estyn's response – Estyn does not have a strong view about this matter but is content with reducing the timescale.

Proposal – the Welsh Government proposes to amend the existing Regulations to require the production of a post inspection action plan to 20 working days.

Summary of additional comments to the consultation

A summary of the additional comments from the joint public consultation issued electronically on the Welsh Government website were:

The 35 working day timescale of production of the inspection report should be reduced.

- There should be more consistency in the way schools are inspected –
- there is still a large discrepancy in the teams and judgements made when comparing other schools' reports and experiences.
- A 'cap' on the number of years retired personnel can carry out the role of inspectors to ensure that inspectors knowledge is current.
- Inspection of safeguarding issues should be separated from educational inspection and occur at no notice.
- The inspection framework should be pruned and simplified focusing on standards achieved and quality of provision.
- Consider reforming the inspection process – inspecting Secondary Schools together with their main feeder primaries and issuing the reports together.
- Concerns that inspectors only look at the results over a 3 year period, without considering pupils' starting points.
- Should inspections taking place in September will receive notice in July and have much longer to prepare.
- Inspectors should arrive at a provider ready to see what is actually happening rather than looking for evidence of the data they have already analysed.
- Greater attention needs to be given to the quality and content of PSE rather than referring merely to attendance rates and successful off-timetable events.
- Concerns about the loss of subject expertise in the inspector force brought about by subjects not being specifically inspected during an inspection.
- It seems unfair that if you have a follow up visit and the grading has altered this is not reflected on the system.
- Specific guidance is needed for the criteria to meet an 'excellent' judgement. It is far too vague at present and unhelpful for schools and inspectors to enable reliable and consistent judgements to be made.
- Ability to predict when inspections will take place does not happen for WBL inspections and therefore we would caution any rationale for a change to the overall inspection regime as a result of anomalies in one or two of the education sectors. The nature of the CIF is to ensure consistency across all sectors and therefore it is essential that the views of all are taken into consideration.

- It would seem that inspection offers another level of accountability that is unnecessary when we have consortium system leaders charged with challenging schools, consortium categorisation and national banding.
- Many governors would like to see the meeting with the full governing body reinstated, particularly for feedback from the inspection. This would also be conducive for the action plan to be produced in a slightly shorter timescale.
- It would be useful if the time frame for publication of the inspection report could be reduced (one respondent suggested 15 working days).
- There are some differences to be considered between Schools/FE/WBL as schools work on a termly basis whereas all providers work with learners all year.
- If it is the intention of DfES to move to a paperless management system for WBL, then we need to ensure that all sources of data are clearly identified to avoid any misunderstandings during the inspection period.
- With the Qualifications Review and the potential introduction of the LAPs there will be considerable change for post 16 delivery affecting the landscape for inspection post 2014.
- Judgements on the qualitative aspects of the school, such as pastoral care and guidance are overshadowed by judgements based upon an analysis of statistical data. Inspections should involve a clear distinction between the evaluation of the qualitative performance of a school and the quantitative.
- All providers of early education should be inspected within a six year period, no matter how many children they are registered to care for. Changes should be made to regulation to ensure that childminders delivering the foundation stage are also inspected.

Next steps

The Welsh Government will consider the best way to proceed in relation to those proposals that require changes to current legislation.

List of respondents

1. Tony Bate
2. Sue Owen
3. Nigel Davies, Wrexham local authority
4. Dyfrig Ellis, Ysgol Gymraeg Lon Las
5. Respondent wishes to remain anonymous
6. Respondent wishes to remain anonymous
7. Emyr Wynne Jones, Carmarthenshire local authority
8. Heather Penney
9. Respondent wishes to remain anonymous
10. Respondent wishes to remain anonymous
11. Dr Andrew Cornish, Coleg Sir Gar
12. Alan Mackay, A4E Wales
13. Respondent wishes to remain anonymous
14. Respondent wishes to remain anonymous
15. Respondent wishes to remain anonymous
16. Peter Maddocks, Ysgol y Gader, Dolgellau
17. Steve Rees, Evenlode Primary School
18. Ystruth Primary School
19. Respondent wishes to remain anonymous
20. G Higginbotham, Meifod Consulting Cyf
21. Respondent wishes to remain anonymous
22. Mark Gunn, Undy Primary School
23. JM Alter, Llantwit Major Comprehensive School, Vale of Glamorgan
24. Respondent wishes to remain anonymous
25. Reg Hughes
26. Mrs Shan Clark
27. Jane Jenkins, Moorland Primary School
28. A Lawrence
29. Llin Elis, Ysgol Nant y Coed
30. Mark Biltcliffe, Drury Primary School
31. Moya Russ, Corpus Christie High School
32. Helen Jones, Ysgol y Clogau
33. Respondent wishes to remain anonymous

34. David Evans
35. Respondent wishes to remain anonymous
36. Steven Downes, Central South Consortium
37. Claire Armistead, Denbighshire County Council
38. Gareth Wyn Roberts, AddysGar (Eduphile Ltd)
39. Respondent wishes to remain anonymous
40. Judith Evans, Coleg Morgannwg
41. Respondent wishes to remain anonymous
42. Respondent wishes to remain anonymous
43. Respondent wishes to remain anonymous
44. Respondent wishes to remain anonymous
45. Elspeth Crombie
46. Anne Gimson
47. Respondent wishes to remain anonymous
48. Janet Robins, Goytre Primary School
49. Respondent wishes to remain anonymous
50. Respondent wishes to remain anonymous
51. Respondent wishes to remain anonymous
52. David Hughes
53. Kate Thomas
54. Ysgol Cynfran
55. Perdita Molesley, Amberleigh School
56. Phil Harrhy, Maesglas Primary School
57. Charmaine Clinch, Roman Catholic Archdiocese of Cardiff
58. Respondent wishes to remain anonymous
59. Respondent wishes to remain anonymous
60. Respondent wishes to remain anonymous
61. Michael Thomas
62. Rhian Loudon
63. Respondent wishes to remain anonymous
64. Anne Carhart, Maesteg School
65. Helen Armitage, Conwy Town Council
66. Respondent wishes to remain anonymous
67. Neil Pryce, Pil Primary School
68. Respondent wishes to remain anonymous

69. Dr P David Ellis
70. Kirsty Retallick, Tonypandy Community College
71. Respondent wishes to remain anonymous
72. Grant Santos, Vocational Skills Partnership (Wales) Ltd
73. Jon-Paul Guy
74. Claire Price, Chepstow School
75. Respondent wishes to remain anonymous
76. Peter Duncan Haworth, Lay Inspector
77. Nicola Gamlin, Colg Gwent
78. Governors Wales
79. H Crich, Flint High School
80. Martin Davies, Ysgol Glan Clwyd
81. Lee Hitchings, Cwmtawe School
82. Aled Davies, Ysgol Gymraeg Glan Cleddau
83. Respondent wishes to remain anonymous
84. Respondent wishes to remain anonymous
85. Rev Dr Stephen James, Diocese of Monmouth
86. Respondent wishes to remain anonymous
87. Lisa Mytton, Acorn Learning Solutions
88. Steven Cruickshank, Tonypandy Community College
89. Respondent wishes to remain anonymous
90. Respondent wishes to remain anonymous
91. Gwilym Jones, Ysgol y Wern
92. Mrs Shirley Davis-Fox, ISA Training Limited
93. Respondent wishes to remain anonymous
94. Respondent wishes to remain anonymous
95. Lee Cummins, Connah; s Quay High School
96. Steve Davies, Education Achievement Service, South East Wales
97. Respondent wishes to remain anonymous
98. Respondent wishes to remain anonymous
99. Respondent wishes to remain anonymous
100. Valerie Jones, Cymru Care Training Ltd
101. Respondent wishes to remain anonymous
102. Keith Booker, Neath Port Talbot College
103. Claire Protheroe, PACEY Cymru

104. David Finch, The College, Ystrad Mynach
105. Respondent wishes to remain anonymous
106. Emma Verrier, Welsh Independent Schools Council
107. Gareth Jones, ASCL
108. Ifor Gruffydd
109. Mrs J Gerrard
110. Ian Dickson, Deeside College
111. Margaret Phelan, University and College Union
112. Paul Targett
113. Respondent wishes to remain anonymous
114. Purnima Tanuku, NDNA Cymru
115. Richard Tither, Coleg Elidyr
116. Rebecca Williams, UCAC
117. Respondent wishes to remain anonymous
118. Respondent wishes to remain anonymous
119. Vanessa Morgan, Cardiff and Vale College
120. Val Simpson, Gwenfo C/W Primary School
121. Owen Hathaway, NUT Cymru
122. Faye Ryan, PRP Training
123. Dr Phillip Dixon, ATL Cymru
124. Andrew Thraves, The GL Education Group
125. Respondent wishes to remain anonymous
126. Respondent wishes to remain anonymous
127. Sion Meredith
128. Fr Timothy Gardner OP, Catholic Education Service
129. Helen Ridout & Sean Jenks, Ysgol Bryn Castell
130. Karen Evans, GTCW
131. Daisy Seabourne, WLGA