

Implementation Review Unit Annual Report 2004–5

Reducing bureaucracy in schools -
progress made, challenges ahead



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About the IRU

Reducing bureaucracy in schools: principles for organisations working with schools

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2. Foreword

Everyone concerned with schools knows the importance of giving teachers and support staff more time to do their core job – helping pupils learn.

We in government, working with our partners, are determined to do this through, for example, the new relationship we are developing with schools and the national agreement on raising standards and tackling workload.

When my predecessor, Charles Clarke, established the Implementation Review Unit (IRU) in 2003, he created a panel of front-line practitioners, independent of government, and asked them to scrutinise and challenge the progress we are making in achieving the reduction in bureaucracy we all want. The IRU has approached this task constructively and with vigour.

In their second year, the IRU has worked hard to ensure the “need to reduce bureaucracy” message has been prominent in the minds of those who work with schools, whether they be in local authorities, partner agencies (such as Ofsted and the Qualifications and Curriculum Authority) or the Department for Education and Skills (DfES) itself.

I am very pleased with the impact the IRU is having on the thinking in my Department and our partner organisations. At the same time, I share the panel’s view that there is still some way to go.



I will not, of course, always agree with everything they say. I do share completely their objective to create a culture whereby bureaucracy is kept to an absolute minimum – to the point where there is no longer a need for the IRU to exist.

While we are not as yet at that stage, I am sure that in the year ahead schools will feel the benefits of the work the IRU is doing.

A handwritten signature in black ink, which reads "Ruth Kelly". The signature is fluid and cursive.

Ruth Kelly
Secretary of State

3. Introduction

When I came to review our activities in preparation for this annual report, I was struck by the breadth and depth of our work during our second year of operation. I am very pleased that we have been able to maintain our initial momentum as it is crucial that we engage with the Department, local authorities and other partner agencies to fulfil our remit of cutting red tape and reducing bureaucracy in schools. We always knew this would be a challenge and our second year of operation proved this. But the prize – reducing the bureaucratic burden on schools and enabling staff to make better use of their time – is worth it.

In this annual report, we have expressed our views and opinions – both positive and negative. Where we are content that the Department, local authorities and partner agencies have sought to reduce workload and bureaucracy, we have said so. However, we have not shied away from identifying issues or initiatives where we feel this is not the case. We are disappointed that progress in some areas has been slower than expected, and there are indications that not all organisations involved are totally committed to reducing bureaucracy in schools.

We have spent a significant amount of time on the New Relationship with Schools (NRwS), which is reflected in the coverage given to the subject in this report. When the programme was launched in 2004 by David Miliband, the Minister for Schools at the time, we felt it



Implementation Review Unit panel members

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had huge potential to reduce bureaucracy in schools and simplify procedures. We believe this is possible if its principles are accepted and adopted by the Department and other organisations working with schools. We do not want to see these principles diluted as the NRwS is rolled out.

Our work with the Department on the NRwS has also demonstrated to us the very real importance of involving serving practitioners in policy development from an early stage. A message we trust the Department is taking to heart.

It has become increasingly clear that there is much that schools can themselves do to reduce the burden of bureaucracy. To this end, we have drawn up a set of over-arching principles for headteachers and governors which could have a positive impact on schools and their staff. We aim to supply posters outlining these principles to schools, so that governing bodies and staff can use them to guide their approach to change management and school improvement. Additionally, we have worked with the National Employers' Organisation for School Teachers (NEOST) and the Confederation of Education Service Managers (ConfEd) to prepare complementary principles for the DfES, local authorities and partner agencies. Both sets of principles are referred to in this report.

It is not within our remit to comment on policy, but it is our duty to question the impact policies have on schools' workloads. We have done this and continued to exert a downward pressure on a variety of organisations that affect schools' workloads. There is still much to be done, particularly if our presence at the national level is to be felt in the classroom. With this in mind, it is important for us to continue to hear from headteachers, members of staff and governors about issues that cause unnecessary bureaucracy in schools or that get in the way of teaching and learning.

Finally, the IRU would like to thank its secretariat for its support, which has been instrumental in helping us take forward our work over the past twelve months.

Dr Chris Nicholls
Chair IRU

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4. Principles for schools

Applying downward pressure on the DfES, local authorities and other agencies to reduce bureaucracy for schools is just one aspect of our work. There is also much that schools themselves can do, whether acting independently, jointly or in partnership with their local authority to reduce and better manage bureaucracy – that which arises from their own internal systems and that which comes in from external sources. We have reflected carefully on this issue and feel that the following principles could have a positive impact on schools and staff.

We believe that headteachers and governors should:

1. adopt non-mandatory guidance only where they consider it to be of relevance to their schools;
2. question the need for non-statutory data and/or information, choosing themselves whether to provide it;
3. challenge requests to provide duplicate data and/or information;
4. identify and have regard to the workload implications for themselves and their staff and the impact on the school of:
 - complying with non-statutory requests for information and data;
 - embarking on specialist programmes and/or other initiatives;

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5. identify resources (including financial) available within the school, or elsewhere, to support complying with non-statutory requests or embarking on specialist programmes, etc;
6. assess (and reduce) the bureaucracy associated with the management of meetings, internal communications and the preparation of school documentation, including the completion of self-evaluation forms;
7. ensure a minimalist approach towards their school's own bureaucratic systems and processes, so as to reduce their impact on both teaching and support staff;
8. follow the principle that their own new policies and initiatives* should be instead of, and not additional to, existing ones;

9. co-operate with the DfES, local authorities and partner agencies in discussing new policies and initiatives, including assisting with the preparation of impact assessments and looking at resource implications.

We have also drawn up a set of principles for the DfES, local authorities and partner agencies to guide them in how to work with schools. These principles are listed in Appendix II.

*The term "new policies and initiatives" embraces new strategies, schemes and directives and changes to existing ones.

5. Progress with the Department for Education and Skills

New Relationship with Schools

In his North of England speech in January 2004, David Miliband, the Minister for Schools at the time, announced his wish to forge a new relationship with schools. He wanted to reach a position where:

- every school is able to have a single conversation about its development priorities, its targets and its support needs;
- the school's targets are set against a clear picture of national priorities, and are based on rigorous self-evaluation and local needs;
- there is a continuing simplification and rationalisation of funding support for school improvement;
- a single plan, based on a school's self-evaluation, will satisfy all monitoring requirements;
- schools are held accountable for pupil outcomes, not process measures or filling in the correct form.

We strongly welcomed and supported the proposal for a new relationship between the Department and schools. We also recognised that there are considerable risks involved in its implementation.

In our report last year we said that:

“We consider it to be the biggest and most important development that we are dealing with, and believe that it has great potential to free up time and energy in schools.”

We also said that:

“... our continued support is conditional; we will not consider the new relationship to be a success unless schools experience a real reduction in burdens.”

We applaud the Department in embarking on such an ambitious programme of reform. We think they are right to take the time to pilot the various elements of the new relationship. We know the value they place on the contributions of the many local practitioners they have involved in development and trialling of the policy.

The New Relationship with Schools (NRwS) will be phased in, as there is a great deal of work to be done by the Department itself and by local education authorities (LEAs) and the national contractor for school improvement, to recruit and train School Improvement Partners (SIPs), to ensure they are well-supported and to put in place arrangements to assure the quality of their work.

Twenty-seven local authorities will introduce the single conversation with SIPs for their secondary schools from September 2005, and the remainder by September 2006. Roll-out for primary schools is likely to be phased in from September 2006 and 2007.

Below, we report on our progress in developing each of the elements that will make up the new relationship: the single school plan; self-evaluation; school improvement partners; collection and use of data; school inspections; the introduction of a school profile; and communications with schools.



The single school plan

For schools the promise of a single plan is perhaps the most significant element of the new relationship. In March this year, the Department repeated the commitment David Miliband gave in January 2004. At the time, he said that the new relationship would mean that a single plan, based on a school's self-evaluation, "will satisfy all monitoring requirements." Now, in *A New Relationship with Schools: Next Steps* the Department says: "There should normally be no need for schools to produce more than one plan."

The plan will play a key part in reducing workload, while at the same time improving standards and securing sharper accountability. As serving practitioners we fully agree that it should be developed and monitored in light of rigorous self-evaluation as part of the single conversation with a school improvement partner.

We recognise that for the Department and its agencies the concept of a single plan presents a significant challenge given the range of initiatives schools are required or invited to undertake. We have made clear our view that the single plan should be the default option for all government initiatives affecting schools, not just those that come directly from the Department.

We are disappointed that we have not been able to persuade the Department to apply this approach to a key policy for their five year strategy – that all secondary schools should become specialist schools. The Department declined to accept our view that, under the new relationship, application for specialist school status should be via a school's single plan.

While we accept that the number of schools yet to achieve specialist status

is quite small, we think the Department underestimated the impact this change would have in emphasising the extent of the Department's commitment to a new relationship.

We are pleased, however, that the Department is working to replace the current specialist school application form with a condensed version. Crucially, it has agreed that redesignation as a specialist school will be via the school plan plus a short supplement. We are urging the Department to make this change for redesignations from no later than September 2006.

We have proposed that the policy initiatives listed below should be outlined in the single plan, supplemented only where absolutely necessary with an extension no longer than four pages.

- Specialist Schools Redesignation
- Extended Schools
- Training Schools
- Leading Edge Schools
- Key Stage 3 Strategies
- Excellence in Cities (EIC)
- Education Action Zones (EAZ)
- Behaviour and Education Support Teams (BEST)
- National Healthy School Standard
- Primary Strategy Learning Networks
- Careermark
- Sportsmark
- Artsmark
- Chartermark
- Basic Skills Award
- Equality Matters (EQM)
- Investors in People (IIP)
- Employment Business Partnerships
- Schools Food Trust
- National Association of Advisers for Computers in Education (NAACE)
- Big Lottery Fund (BLF) funding for extended schools
- Learning and Skills Council funding

Many of these initiatives are led by parts of government outside the Department and we aim to help them develop new approaches to fit in with the NRwS.

School improvement partners

In our view, the quality and credibility of school improvement partners (SIPs) are crucial to the success of the new relationship. We welcome the extensive pilot work the Department is doing in the secondary and the primary phases, and are pleased that it is trialling the approach with special schools to test its effectiveness.

We are satisfied that the Department has practical plans for recruiting high quality secondary SIPs, and are pleased that a high proportion will be serving secondary heads. We recognise the challenge this poses for schools in releasing their heads, but the difficulties are far outweighed by the opportunities for developing leadership right across the system. SIPs will learn as much as the schools with which they engage, and their leadership teams will gain from opportunities to run the school independently.

We have persuaded the Department to assess and accredit candidates for the primary SIP role in the same way as their secondary counterparts. We will look to the Department to ensure that primary SIPs are recruited as far as possible from working and recent heads.

SIPs will be employed by local authorities. The Department has engaged a national contractor to accredit and support them and to have a role in quality assuring their work. We have stressed the importance of establishing a common understanding of the role of SIPs among schools, local authorities and SIPs themselves. This needs to include the lines of authority and accountability.

Through extensive piloting, the Department is making good progress on this, though it is an area we will continue to review, particularly as local Children's Trusts begin to drive forward the *Every Child Matters* agenda.

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The single conversation

In its publication, *A New Relationship with Schools: Next Steps*, the Department says that the single conversation will align “several interactions that many schools have hitherto experienced as separate, fragmented discussions.” Their intention is that it should bring together discussions about:

- schools’ future plans and targets
- support required from outside
- redesignation for specialist school status
- local authorities’ categorisation of schools
- headteachers’ performance
- the follow-up to Ofsted reports.

The publication also states that the single conversation will develop to include the school’s role in contributing towards the *Every Child Matters* outcomes. The Department’s intention is that SIPs’ conversations with schools will focus on educational outcomes and the factors which bear on them, including health, behaviour, attendance and engagement.

We have said that local authorities and the national contractor must both be held accountable for their parts in the new relationship. In particular, the Department needs to be sure that SIPs are equipped to conduct a single conversation instead of the range of contacts that a school has with the LEA and other agencies. At the same time, SIPs need to be responsive to schools who wish to take the lead in drawing in education support services from their local authority or elsewhere. The choice needs to lie with schools.



Local authorities and the national contractor will need to ensure they use SIPs and the single conversation as the channel between schools and local Children’s Trusts. They must avoid parallel lines of planning, bureaucracy and accountability around the contribution schools make to the *Every Child Matters* agenda. This would undermine the purpose of the new relationship in removing burdens and freeing schools to focus on standards.

Self-evaluation

We welcome the Department’s policy that a school’s own self-evaluation should be the starting point for planning, inspection, and discussion with the SIP. We strongly agree that the process of self-evaluation should be developed by each school to meet its own circumstances and needs.

The Department and Ofsted recently published *A New Relationship with Schools: Improving Performance through School Self-Evaluation* - a brief guide on what self-evaluation might cover and how it can be used to raise standards.

We recognise that, for practical purposes, Ofsted inspectors need to see the results of a school's self-evaluation recorded in a common format, and we are pleased that they are replacing their Forms S1 to S4 with a single self-evaluation form (SEF).

We are concerned that as the messages in the self-evaluation guidance filter down to a local level, schools could feel pressured about how to conduct their self-evaluation, and how frequently. Therefore, we have emphasised the importance of relaying the right messages to schools, LEAs and to Ofsted. These messages are:

- Completing the SEF is not self-evaluation – it is the place to record and summarise the findings of a thorough self-evaluation process.
- Self-evaluation should draw from a school's cycle of development, including planning, monitoring, performance management of staff, planning and delivery of continuous professional development and assessment and target-setting for learners' educational and personal development. These processes are, or should be, self-evaluative.
- The SEF should be updated at least annually.

Our message to schools is that self-evaluation is a means, not an end. It should lead to a single school plan with a number of priorities for action, focused on improving the outcomes for the wellbeing of learners. The self-evaluation process should prove that these are the right priorities for the schools at the time.

We strongly believe schools should regularly evaluate themselves. Evaluation should not be built upon questionnaire and written reports. Though it sometimes will be appropriate to use these as part of the mix, the foundation for self-evaluation should be the existing planning and review processes referred to above.

Our aim is that the new accountability process implied in the new relationship with schools should reduce workloads, not increase them.

As a result, we encourage SIPs, local authorities and other intermediaries engaging with schools to avoid introducing burdensome, prescribed, or paper-driven processes.

Additionally, we urge the Department and the Chief Inspector to reinforce these messages to schools and those working with them, and to be alert to unnecessary paperwork and bureaucracy.

Our message to schools is that self-evaluation is a means, not an end.

It should lead to a single school plan with a number of priorities for action...

...avoid introducing burdensome, prescribed, or paper-driven processes.

School inspections

A key element of the new relationship is shorter school inspections that focus more on outcomes than activity, and provide reports outlining areas for improvement. We are pleased that this is an aspect of the new relationship that is developing at a fast pace.

From September 2005, school inspections will normally be at two to five days notice with smaller teams visiting for a maximum of two days. The starting point for inspections will be the school's own self-evaluation and slimmed-down analyses of performance data. The intention is to create greater engagement with the leadership team and reduce scrutiny of every aspect of school life.

We have remained in close contact with Ofsted and the Department as they consulted on and piloted these new arrangements. We believe that the new inspections offer a real opportunity to reduce burden and stress and to increase the effectiveness of inspection as a tool for school improvement. This depends on Ofsted equipping its inspectors with the right skills and attitudes. We will be monitoring this in the year ahead and will be interested in hearing of schools' experiences under the new inspection arrangements.

Data

Data is crucial to getting the new relationship right. We need to:

- reach agreement on the data and analyses to be used to assess school performance;
- minimise the burdens of other data collections while maximising their impact on pupils' standards of achievement and wellbeing.

We have worked on both of these areas in the past year.

We welcome the move away from crude, inaccurate grades and towards a focus on discrete pupil groups, and believe it will encourage inclusive practice.

Data for school performance

We are encouraged by the work being done by the Department and Ofsted to bring together and improve the pupil achievement tracker (PAT) and performance and assessment reports (PANDAs). The intention is that this is to be used by SIPs, Ofsted, local authorities, the Department and schools themselves. It will be called RAISEonline.

As the data is put into context, it will make more sense to schools and be of greater use to leadership teams. We welcome the move away from crude, inaccurate grades and towards a focus on discrete pupil groups, and believe it will encourage inclusive practice. This area should be a focus for SIPs in their work with schools.

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However, we have indicated that this data needs to be used with caution, as small group sizes can make data less reliable. Those who use the data analyses need to be aware of this to reduce the risk of non-valid data leading to inaccurate conclusions. In our view, this happens too much already and we are pleased that the Department intends to address this by flagging up results that are statistically significant.

We have also said that even when data is well-presented, only those with expertise – SIPs, Ofsted inspectors, heads and deputies – are able to interpret and discuss it effectively. We have suggested that the Department considers creating narrative material and guidance on interpretation to enable wider groups of staff to use data effectively to support teaching and learning. We understand that the primary and secondary national strategies will in 2005-06 begin delivering a programme aimed at developing data literacy in local authorities and schools.

Burdens of wider data collections

The Department has said that requests for new data should be for information that is useful to schools, and those requesting data should convince schools of the need for its collection. We are as yet unconvinced that the Department can deliver on these commitments.

For example, we have made clear to the Department that, while we are firmly behind the Government's objective of reducing absence and tackling truancy, we do not necessarily agree that schools need to report termly data on absence.

Collecting this data is a time-consuming task and resources would be better used to reduce absences. We stressed that the need for schools to distinguish between authorised and unauthorised absences in annual data returns was particularly unnecessary. At a national level, this data is unreliable because of the differing definitions applied by schools to the "unauthorised" descriptor.

We expressed similar doubt about the requirement that schools should report absences by reason, for example study leave. We believe that undifferentiated absence data is sufficient to highlight schools that may need support. Unfortunately, we were unable to sway the Department from their position.

There are several proposals for new data requirements in the pipeline and a move towards termly collections for some items. The Department believes that careful piloting, realistic lead times, good training, software improvements and reliable systems for automatically harvesting data from school systems will mean richer data available to schools, local authorities and nationally, with less burden arising from its collection in the future.

We think the Department may be underestimating both the work involved in capturing and updating large numbers of individual data items within a school environment, and the difficulties they will face in managing large volumes of unreliable and unnecessary data.

We will need to keep a close eye on this in the future.

Communication with schools

We are pleased that the Department has made improving communication with schools a key element of its work on the new relationship. Progress in this area promises perhaps the most immediate impact on schools and can set the tone for the whole of the relationship.

We support in principle the move to fortnightly email notification of government publications, with online ordering for hard copies. We have urged the Department to monitor its practical effectiveness closely. We suggest, also, that schools should look themselves at how they are adjusting to the new arrangements.

At present, the email messages the DfES sends out are basic and uninspiring with limited signposting. Although the variation between school computer systems means the Department is restricted in the changes it can make, we do welcome the move to pilot a range of improvements.

The accessibility of online material is equally important. Staff spend too much time searching for important material across a range of DfES sponsored websites. Last year we were encouraged to hear about plans for an integrated schools web. We are concerned that progress might have slowed.

We have made clear to the Department that, with school improvement of vital concern to 23,000 schools, they should avoid any delay in modernising their web-based communications with schools.



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Impact assessments

We strongly welcomed the introduction at the end of 2003 of an impact assessment system for new initiatives affecting schools. For the first time, DfES officials and Ministers have been provided with timely information about how new measures will affect people working in schools. They also have a more effective method of ensuring that new initiatives are properly aligned with existing programmes, so that overlap and duplication can be eliminated.

The impact assessment system also provides a broad indication of the volume of new measures being generated by the DfES. It is important to recognise that individual initiatives vary considerably in size and scope, and in the amount of extra work for the school workforce. Even with that caveat, it is encouraging that the number of new initiatives to be introduced in 2005 is 56% down on 2004. It is, of course, possible that further new initiatives may yet be introduced this year.

We believe that this reduction is due in part to the NRwS programme, which is focused on fewer targets and compulsory measures for schools. Although the new administration may lead to an increase in activity, we hope that change will be managed effectively within the new relationship.

We are particularly concerned that there should be a reduction in compulsory changes, and we welcome the production of optional materials. We also recognise the real need for clear and precise language in this context, to ensure that it is obvious what is guidance and what is statute.

In the second half of 2004, the impact assessment systems, which initially covered just schools, were extended to cover the early years sector. We welcome this, because there are new cross-phase initiatives, particularly those arising from the *Every Child Matters* agenda, which have a direct bearing on schools. It is very important that such initiatives, for example Extended Schools, are considered at an early stage and ideally through a single impact assessment process.

We are pleased that the Department is reviewing its impact assessment process to ensure that it remains robust and capable of supporting the next phases of NRwS, *Every Child Matters*, the forthcoming Schools White Paper and so on.

We think the Department should build on the work it has done so far by publishing an early estimate of the impact on schools' resources when they publicly consult on proposals for new policies. This would allow consultees working in schools to either confirm these estimates or explain why they need to change.

For the first time, DfES officials and Ministers have been provided with timely information about how new measures will affect people working in schools.

Special Educational Needs

We share the widespread and longstanding view that the processes and paperwork associated with meeting legal commitments towards children with special educational needs are both more burdensome and less effective than they should and could be.

In our report last year we welcomed the joint Cabinet Office/DfES review of Special Educational Needs and we applauded its recommendations. We acknowledge the extensive work being done to prepare for the implementation of many of those recommendations. We are, however, concerned that from the schools' perspective so little has yet happened.

We welcome the fact that the Department has identified some key areas where change can make the greatest impact on schools:

Alternative approaches to Individual Education Plans

The Department has begun a drive to encourage schools and local authorities to consider alternative planning and recording approaches in place of Individual Education Plans (IEPs). We urge schools and LEAs to look again at:

- the guidance in the SEN toolkit on managing IEPs, group planning and alternative approaches to recording and reporting;
- the national strategies guidance on provision mapping as an alternative;



- *The Management Guide for SENCOs* produced by the National Primary Strategy in 2003, which sets out clearly when it may not be appropriate to use IEPs;
- *Maximising Attainment: ensuring the attainment of pupils with SEN* produced by the KS3 Strategy this year, which also sets out clearly when it is appropriate not to use IEPs.

We are pleased that the Department is:

- working with Ofsted to ensure that the new school inspection arrangements reinforce effective rather than bureaucratic practice;
- raising the issue with local authority officers via their team of SEN advisers;
- continuing to work with national strategy colleagues and the SEN regional partnerships to promote provision mapping.

Annual review process

We understand that work is underway in four SEN regional partnerships to assess the annual review process, with the aim of identifying ways of reducing school paperwork while safeguarding individual children's needs and parents' rights, and considering how best to involve pupils.

We urge the Department to make every effort to promote the lessons of this work as widely and as vigorously as possible. And we urge schools to respond accordingly.

Strengthening the SENCO role

Dealing with special educational needs is a challenge for every teacher every day. We know that the Department shares our view that in general SENCOs are still spending too much time on paperwork at the expense of guiding other members of the school's leadership and workforce on effective practice. We welcome the Department's intention to reinforce the importance of the leadership role of SENCOs in their messages to schools and local authorities.

We understand that the Department plans:

- a series of focus groups for SENCOs to identify effective practice and potential solutions to practical issues, with the results disseminated through the SEN regional partnerships and National Association for Special Educational Needs (NASEN) publications;

- joint development with the secondary national strategy of a management guide for school SEN and disability managers (to include special schools) which will build upon the results of the review of good practice and include advice on the management of additional adults working with SEN pupils;
- raising this issue with the National College of School Leadership, to ensure that leadership programmes for heads and governors reinforce a better understanding of the benefits of using SENCOs in a strategic role across the school rather than spending time on paperwork.

Tackling bureaucracy at local authority level

We support the message the Department is sending to local authorities. They have a clear responsibility to reduce reliance on statements. By delegating more resources for SEN directly to schools, there will be greater capacity in schools to promote earlier intervention, which should reduce the need for statements and associated bureaucracy. It should mean less paperwork.

We understand that the overall number of statements has fallen and there has been a significant reduction in the number of new statements, from 36,200 in 1998 to 26,000 (provisional data) in 2004. The SEN advisers report that nearly all the local authorities they have visited have plans to further reduce their reliance on statements, and the advisers will proactively challenge any local authorities with high rates of statementing that are struggling to make progress in this area.

Message to schools

We welcome the efforts the Department is making to get these messages to schools. These include:

- articles and links on cutting bureaucracy in the June emails to schools and local authorities and in the 6 June edition of the SEN Update (distributed to around 8,000 recipients electronically and on paper);
- features planned for Teachers TV and Teachers Magazine over the coming months;
- the national strategies highlighting the issue and providing information through their contacts with local authority link advisers/inspectors;
- the work of the SEN advisers.

We think schools can do much to help themselves. We urge school leaders and SENCOs to draw on all of the above and to seek out more effective and less burdensome practice. Where they meet resistance or reluctance from local authorities they should call on the Department and its regional network as allies to make their case.

For our part, over the year ahead, we will watch closely to assess the effectiveness of the actions set out above in securing change at working level in schools. Where we think the Department needs to do more we will say so.



Foundation Stage Profiles

Through visits to primary schools and feedback from our network of contacts we think it likely that while most schools are producing Foundation Stage Profiles (FSPs). We are not clear they are yet improving the learning or wellbeing of their pupils.

The message we get is that teachers see little connection between the FSP and assessments made in early years settings or those needed as children move into key stage 1. Many teachers seem to use other assessment and monitoring processes alongside the FSP.

We have said to the Department and the Qualifications and Curriculum Agency (QCA) that if this is the case nationally then it means that teachers are devoting considerable time and effort to fruitless work.

The Department sees significant benefits to children's smooth transition to KS1 through effective transfer and use of foundation stage assessment information. Both the Department and the QCA acknowledge the need to rationalise assessments and cut out unnecessary bureaucracy.

For the future, they commit themselves to ensuring that the Common Assessment Framework (CAF) envisaged by *Every Child Matters* is integrated with existing assessments including the FSP.

For existing arrangements they acknowledge some difficulties. These they put down to teachers' assessment skills, workload issues and lack of clarity about what is mandatory and what is optional.

They point to new training to develop the assessment skills of Reception and Year 1 teachers so that they can target teaching to the needs of their children more effectively.

They refer to concerns about workload in the foundation stage reported in a survey they conducted recently. The issues emerging were about the additional assessments and onerous monitoring processes required by some LEAs.

In an effort to clarify the position the DfES Minister at the time, Margaret Hodge, wrote to schools and LEAs setting out the statutory assessment requirements and asking LEAs not to impose additional burdens on schools and settings.

She made clear, for example, that the QCA profile scales booklet itself is not obligatory and practitioners can use whatever recording system they prefer, provided that they can complete the statutory profile summary (13 points) for each child at the end of the foundation stage.

We are to some extent encouraged by the response from the Department and the QCA. While the scope for duplication, overlap, confusion and unnecessary burdens remains, we believe there is an opportunity for sensible rationalisation and implementation of assessment processes.

We propose to continue to work closely with the Department and the QCA. We would be grateful to hear from more schools on their experiences in this area, good and bad – please see our contact details on Page 29.

Funding

We have responded to the consultation on new funding arrangements from 2006/07. While we acknowledge the intention to provide schools with income levels at least two years in advance, this will only be beneficial if expenditure remains stable over the same period.

At one point, we were concerned about the possibility of introducing accounting on an academic year in addition to a financial year. Our reservations were shared by others and we understand that the possibility has now receded.

We have supported the efforts made to simplify funding streams, as much time is wasted by schools trying to calculate the effect of changes to complex funding streams and formula. To aid this, we have called on the Department to ask LEAs to provide schools with software to model 'what if' scenarios for their funding if, for example, projections show that student numbers will change in future years.

We have also been asking the Learning and Skills Council (LSC) to provide this type of software. It tells us its sixth form funding guidance now helps schools work out a final allocation when they know the actual pupil numbers in September.

The LSC thinks that many schools have found this clear and helpful. We will be interested to hear directly from schools on this.



6. Progress with partner organisations

Meetings with key partner agencies

To fulfil our remit to cut red tape and free up teachers' time to concentrate on teaching and learning, we meet regularly with a number of key partner organisations whose work impacts on schools. We appreciate the opportunities afforded by these meetings to raise issues which have been brought to our attention, often by individual members of schools' staff. We also value agencies consulting us at an early stage on the workload implications of new policies and initiatives. The following section provides a short update on these meetings.

National Employers Organisation for School Teachers (NEOST)

We were very pleased to meet with NEOST elected members in November and build on the positive working relationship we have established with their secretariat. During the last year, we have continued to work jointly, together with the Confederation of Education and Children's Services Managers, to encourage local authorities to develop effective systems of 'gatekeeping' and impact assessments. With the exception of a few authorities, the feedback on taking forward impact assessments (to determine the likely effect on schools of new policies and initiatives) has been disappointing. To re-energise authorities, the IRU has published –



Meeting between the Implementation Review Unit and the Teacher Training Agency
Left to right: Ian Hopper (TTA), Ralph Tabberer (Chief Executive, TTA), Richard Brown (IRU), Dame Pat Collarbone (NRT), Tony Wright (IRU), Graeme Hornsby (IRU)

jointly with NEOST and ConfEd – a handbook to further encourage the development of effective systems of 'gatekeeping' and impact assessments. The principles shown in Appendix II form part of this publication.

The Confederation of Education and Children's Services Managers (ConfEd)

In addition to our continuing work on the development of local authority gatekeeping and impact assessments (see NEOST above), both ConfEd and the IRU have expressed concerns over the potential workload implications of the data collection requirements of the Race Relations (Amendment) Act 2000. We understand the need for the data, but we are keen to avoid another burdensome exercise for schools and local authorities. For this reason, we are

NEOST

confed
confederation of education service managers

encouraging the DfES to ensure the software that will support the School Workforce Common Basic Data Set will also enable collection of this data.

We have also been reviewing with ConfEd the LEA role in implementing the New Relationship with Schools and Extended Schools programmes, and will continue to do so.

Learning and Skills Council (LSC)

We maintained a positive dialogue with the LSC, which has been useful in ensuring that post-16 issues are integrated into the NRwS, particularly regarding the role of the SIP, the self-process and the development of success measures.

We have pressed for local initiative funding controlled by the LSC to be included in the streamlined bidding process where single school plans and self-evaluation forms are the main documentation for grant applications. We will pursue this in the year ahead.

We have provided the LSC with examples of poor communications on financial allocations to schools and have asked them to address this. We have also asked them to provide a funding calculator so that schools can model future financial allocations based on predicted changes in student numbers and subject choices.

Time taken in schools to follow up unclear and misleading allocations and to produce their own methods for forward calculations is, in our view, an unnecessary burden for schools. In the light of our comments, the LSC has modified the presentation of sixth form allocations to make clearer the total amount of funding a school receives each year.

The LSC sought our views on the audit of student data provided by schools for funding allocations. We are pleased to note their commitment to reducing bureaucracy and keeping the number of audits to a minimum. As the LSC is proposing to use existing LEA audit arrangements, we urged them to combine the audit of post-16 funding data with planned audit visits to schools to avoid duplication of work and minimise disruption.

We will be interested to hear from schools the extent to which these changes have a positive impact.

Ofsted

Over the year, we raised a wide variety of issues with the inspectorate. Our discussions were always positive, open and constructive. Topics covered included:

- initial thoughts about the *Every Child Matters* outcomes for children, where we were assured that there would be no separate stream of inspections - a light touch approach will be developed;
- different types of inspection affecting the same school, where Ofsted assured us that normally they will co-ordinate these to avoid multiple visits;
- the post-inspection questionnaire, where Ofsted set out how data is used by senior managers to drive up the quality of inspections, including withdrawing a team where work was not up to standard;
- rationalising and improving school performance data on which we report more fully in the section on the NRwS.



We looked also at the quality assurance of inspections. Ofsted has developed a new procedure for complaints. From September, schools will be able to contact Ofsted helplines and every effort will be made to resolve matters before the report is published. There will still be a formal complaints procedure for schools that wish to take the matter further.

Ofsted is setting up a group to monitor the impact of its work on the organisations it inspects. We very much welcome this and are pleased to be kept abreast of its work on schools inspection and to comment on its plans and findings.

We have, of course, taken an interest in the development of the new inspection framework. Ofsted will introduce this nationally from September this year. We have made clear to the Chief Inspector the importance we attach to it.

We recognise the work Ofsted has always done to make clear to schools that under the current arrangements the announcement of an inspection date should trigger neither excessive and burdensome preparation nor the build-up of unnecessary anxiety.

We think the new framework offers a real opportunity to move decisively to a position where inspections are seen widely as a professional and forward-looking dialogue. That means learning from the best of the approaches and attitudes of the group of inspectors conducting the pilots and instilling them across the whole of the inspectorate quickly.

This will ensure that school inspection makes its full contribution to the achievement and wellbeing of children. We do not underestimate the task Ofsted has set itself. We will watch closely in the year ahead for signs that the new framework is delivering what is promised.

We write more fully on these new inspection arrangements in the section of this report on the NRwS.

Teacher Training Agency (TTA)

During the past year, the TTA has taken on a greatly-expanded remit. From September, it will formally change its name to the Training and Development Agency. Its remit now includes a new role in the training and development of the whole school workforce and major responsibilities for bringing greater coherence to the development of teachers.

We have stressed to the TTA the importance of both minimising new burdens on schools and actively reducing existing ones. We will look with interest at how it goes about this.

Our discussions with the agency have been constructive and forward-looking. The TTA shares our concerns and has shown willingness to address them. In the months ahead, we will look at the progress it makes in the following areas:

- **Graduate teacher programme -** Schools' experience is that administration and communication have sometimes been poor and candidates have reported problems. The TTA has had a team looking at this and is working with the designated recommending bodies.
- **Teachers working with support staff -** The agency has been looking at how this can be better covered in initial teacher training and is developing new guidance for trainers.



– **Initial Teacher Training (ITT) providers passing their burdens on to schools -**

The TTA has committed to a list of actions to reduce such burdens. It has issued guidance on ITT partnership practice during 2004, and we will monitor the extent to which it is followed.

– **Partnership promotion schools -**

We raised the issue of the time the bidding process takes, with funding almost retrospective if projects are to get off the ground. The TTA conceded improvement was necessary and signalled its intention to move towards grant-based approaches to funding wherever possible.

– **High level teaching assistants -**

The TTA has piloted its assessment model carefully and agreed to monitor its implementation. Schools have emphasised the need to keep an eye on the workload involved in the targeted assessment.

– **Training schools -** Following a period of uncertainty, we are pleased that the agency and the Department have agreed that applications and accountability should be handled through the new relationship. We will continue to work with the agency to make sure that issues around the proper representation of primaries and the geographical spread are resolved.

– **Variation in trainee assessment processes -** The agency has recently agreed to our request to look at the burdens on schools arising from the variety of processes used for assessing trainees against the Qualified Teacher Status (QTS) standards. These arise both from the provision of multiple routes into teaching and the differences between providers offering the same entry route. We believe that there is scope for significant consolidation, which would lead to

reductions in workload and better quality and consistency of training.

National Remodelling Team (NRT)

We value highly the close working relationship we have developed with Dame Pat Collarbone and her colleagues at the NRT. We have a shared agenda which is encapsulated in the title of the national agreement – Raising Standards and Tackling Workload.

Our meetings have concentrated on those issues which impact directly on staff in schools, including supporting the NRT's work on the development of Work-Life Balance policies. This is an issue we will no doubt return to in our future meetings, particularly as the implications of the *Every Child Matters* and Extended Schools agenda become clearer.

We will do all this in close liaison with the TTA whose remit now includes oversight of the work of the NRT.

Qualifications and Curriculum Authority (QCA)

We have continued to press for work on the Foundation Stage Profile (FSP) both to reduce its burden and to determine the value it adds. We have also taken a close interest in the work of the QCA's National Assessment Agency to modernise the examination process.

We set out progress on the FSP on page 20 of this report. On exam modernisation we are much encouraged by the progress being made. The funding to update equipment in examination offices in schools is a positive step. We are pleased that the arrangements for schools to claim payments seem



designed to ensure the money is allocated and spent.

The single timetable for the examination boards should be another step forward of real practical benefit in schools, and for parents and pupils. The introduction of track and trace for the movement of exam scripts is another welcome innovation.

The intention to develop a template job description and person specification for the exam officer role should be helpful. We have stressed to the QCA that it needs a balanced message to schools about who takes responsibility for ensuring a smooth examination process:

- Administration and invigilation roles are best filled by someone other than a qualified teacher.
- Successful management of exams requires the right level of input from the senior leadership team in a school.

Last year, we reported that we were then discussing with the QCA the workload involved in moderating grades on coursework in art and design and on simplifying the exams' admissions process generally. We are pleased that the QCA, with the awarding bodies, is working on both of these areas and a range of improvements are in hand.

On all of this we welcome feedback from schools on the extent to which changes impact on reducing workload.

Big Lottery Fund (BLF)

The Big Lottery Fund combines the roles of the New Opportunities Fund (NOF) and the Community Fund in distributing lottery cash. In our report last year we said that the NOF and the Department should work more closely to establish less burdensome bidding and accountability processes. Over the past year, there has been some simplification of, for example, the application process for support for extended schools. We welcome this and urge the BLF to go further.

We are pleased that the Department has agreed to work closely with the BLF to see how far their processes can be aligned with those the Department is developing for its NRwS. We will press the BLF to go as far and as quickly down this route as possible, within the legal frameworks under which it operates. If necessary, we will press the government to ensure this framework is sufficiently flexible to allow this.

Supported by



7. Influencing other government departments

Our work to date has been focused on the DfES, its partner agencies and LEAs. Increasingly other government departments are looking to schools to move forward their economic and social policies. While it is legitimate for other departments to seek the involvement of schools, their approach is sometimes haphazard and counterproductive.

When we raised this issue with Ministers they were sympathetic and Stephen Twigg wrote to his counterparts in other Departments. The letter proposed encouraging policy managers across Whitehall to work in co-ordination. It offered a checklist for officials to help them take proper account of the particular circumstances of schools, and suggested they make early contact with DfES colleagues through the medium of the IRU secretariat.

We were encouraged by the positive responses received from other Ministers, and by the contacts some officials in other departments made with our secretariat. It is too early to judge whether this action has yielded results and we will continue to press for co-operation between Departments and agencies on all matters affecting the administration and activities of schools.



Implementation Review Unit Secretariat
Left to right: Nick Tomlinson, Sarah Jocelyn, Peter Ayre, Alan Jeffery

8. Our future programme

There is an overwhelming desire within most parts of the DfES, local authorities and partner organisations to work with us to reduce red tape and bureaucratic burdens in schools. We will continue to build on this over the coming year.

Where we doubt that such a commitment exists, or the organisation is struggling to minimise its demands on schools, we will help by challenging or supporting it.

We will address many areas over the next year and we will continue to work closely with the Department on a range of issues. We will maintain a particular interest in the NRwS which is of fundamental importance to the way schools operate in the future. We will also continue to follow closely the *Every Child Matters* agenda where we see considerable potential for growth in bureaucracy, particularly that associated with the Common Assessment Framework and the development of multi-disciplinary working.

We will maintain a particular interest in the NRwS which is of fundamental importance to the way schools operate in the future.

Additionally, we will monitor developments in the 14 to 19 age range following the Department's response to the Tomlinson Report and the Department's plans to gather data on the school workforce. We are committed to further reduce the bureaucracy associated with special educational needs, as insufficient progress has so far been made.

The IRU values the support of the social partners represented on the Workforce Agreement Monitoring Group (WAMG). We will continue, both as a panel and as individuals, to work closely over the coming year with WAMG to ensure the delivery of our joint agenda.

9. Appendices

I. About the IRU

What is the IRU?

The IRU is an independent scrutiny unit with a remit to cut red tape and reduce bureaucracy in schools. It was set up as one of a number of improvement initiatives following the 2003 national agreement on raising standards and tackling workload in schools.

As a champion of reducing bureaucracy in schools, the unit has a gatekeeper role. It seeks to eliminate or minimise any bureaucratic and workload burdens that result from the implementation of education policy by the DfES, national agencies, local authorities – and by schools themselves.

The IRU is an independent panel of 12 experienced school practitioners from across England, representing primary, secondary and special schools.

What does the IRU do?

The panel:

- champions the reduction of bureaucracy both nationally and locally, promoting examples of good practice;
- co-ordinates bureaucracy reduction across national and local organisations and agencies;
- commissions and carries out reviews of bureaucracy associated with new and existing education policy and procedures;

- carries out or instigates actions to deal with unnecessary bureaucracy and burdens across the education system;
- meets regularly as a panel to discuss, plan and progress its work ;
- maintains ongoing contact with Ministers, senior officials and other representatives from policy areas at the Department, with the various agencies, representative bodies and groups;
- makes regular contact with a range of local authorities and schools across the country.

The IRU is funded by the DfES. Panel members are supported in their review activity by a secretariat of DfES staff.

How can you contact the IRU?

You may get in touch with the IRU

- by email: iru.panel@dfes.gsi.gov.uk
- by phone: 020 7273 6273 (IRU Secretariat)
- by using the form on the IRU website: www.dfes.gov.uk/iru
- by writing to the IRU at the Department for Education and Skills, 3C Sanctuary Buildings, Great Smith Street, London SW1P 3BT.

II. Reducing bureaucracy in schools: principles for organisations working with schools

We expect the DfES, local authorities (including LEAs and Children's Services Authorities) and partner agencies to work with schools in accordance with the spirit and requirements of the NRwS.

New initiatives and policies should be instead of, and not additional to, existing ones. These organisations are expected not only to assess their own potential impact on the workload of schools, but also follow the guidelines below.

1. When developing new policies and initiatives* they should:
 - clearly demonstrate their direct or indirect benefit to children in schools and to teaching and learning;
 - undertake, and make available, impact assessments showing the implication for schools of individual policies and initiatives;
 - clearly indicate whether individual policies and initiatives are statutory, identifying relevant legislation as appropriate;
 - provide sufficient lead-in time for their introduction;
 - clearly identify resource implications, both in terms of potential savings and/or increases;
 - where appropriate, ensure additional resources are made available, and easily identifiable;
- work with headteachers and governors to identify how existing resources can be released to support the new policies and initiatives;
- as part of their review of policies and initiatives once implemented, evaluate their impact assessments and make available the results.
2. When producing guidance, they should clearly identify whether the guidance is:
 - mandatory
 - if so, identify the covering directive;
 - non-mandatory
 - if so, indicate whether schools will be expected to follow it and why.
 - if not expected to follow it, will schools feel obliged to participate, for example, will schools be wary of Ofsted judgements?
3. When seeking data, and other information, from schools, they should:
 - ensure requests are made in accordance with the protocol on data sharing and rationalisation in the schools sector (see page 13 of this booklet);
 - use electronic methods of data collection and transfer;
 - avoid making duplicate requests.
4. They should be prepared to discuss new policies and initiatives with headteachers, governors and staff (and/or their representatives) and take into account their views.
5. They should develop gatekeeping systems to reduce the likelihood of unnecessary material being sent to schools or requests made of them.

Organisations working with schools should also take account of the principles we have suggested schools should adopt. These include -

Schools are expected to:

1. determine themselves whether they will follow non-mandatory guidance;
2. question the need for non-statutory data and/or information, choosing themselves whether to provide it;
3. challenge requests to provide duplicate data and/or information;
4. co-operate with the DfES, local authorities (including LEAs and Children's Services Authorities) and partner agencies in discussing new policies and initiatives, including assisting with the preparation of Impact Assessments and looking at resource implications.

*The term "new policies and initiatives" also embraces new strategies, schemes and directives and changes to existing ones.

Organisations working with schools should also take account of the principles we have suggested schools should adopt.

Schools are expected to determine themselves whether they will follow non-mandatory guidance.

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