Ofsted Education Inspection Framework 2019: inspecting the substance of education

A joint consultation response from the Children and Young People's Mental Health Coalition and the Partnership for Well-being and Mental Health in Schools

Introduction:

This is a joint submission by Children and Young People's Mental Health Coalition and the Partnership for Well-being and Mental Health in Schools. Membership of these two coalitions includes leading charities, professional and provider associations from across the education, health and social care sectors, and the voluntary and community sector.

Our members overall welcome the proposed changes to the Education Inspection Framework and the handbook. The reduced focus on performance data and outcomes is a step in the right direction and 'attainment' is considered more broadly across the whole of the framework. We also welcome the shift towards evaluating education providers' approach to preparing pupils beyond the 'academic, technical or vocational'. This will allow for more opportunity to recognise the different factors that form a child's experience of education.

CYPMHC and PWBMHS are supportive of the proposed separate judgements of "behaviour and attitudes" and "personal development". We believe that these will enable a greater focus on the positive factors that support the wellbeing and development of learners, such as the need to keep both physically and mentally healthy.

We strongly believe that the promotion of wellbeing and mental health in schools is not an objective that conflicts with academic attainment but should boost children's learning and development.

Key messages:

This consultation response has been informed by the views, evidence and experience shared by Steering Group members of CYPMHC and PWBMHS following an engagement event in March 2019.

In this document, we are primarily responding to draft proposals set out in the '**Education inspection framework 2019: inspecting the substance of education**' on the changes to the inspection judgements. In particular, we will be addressing the below question:

Proposal 2: To what extent do you agree or disagree with the proposed separation of inspection judgements about learners' personal development and learners' behaviour and attitudes

Key recommendations:

Ofsted should consider incorporating the following recommendations within its proposed judgements outlined in the education inspection framework.

Behaviour and attitudes:

a) *The provider's approach to behaviour management emphasises the importance of identifying and addressing the underlying causes of behaviour".*

b) *The new judgement category be renamed 'Behaviour, attitudes and inclusion' to shift the emphasis away from behaviour management that involves exclusion.*

c) *The provider should work closely with parents and carers to promote their child's behaviour and positive attitudes to learning.*

d) *The Department for Education's review of exclusion from school, led by Edward Timpson CBE, should also be used to further inform the inspectorate's approach in relation to the causes and response to school exclusion[1].*

Personal development:

e) *Ofsted should evaluate education provider's approach to recognising and celebrating the extracurricular achievements and progress made by learners.*

f) *The inspectorate should incorporate clear definitions, in either the framework or handbook, of what they mean by concepts such as 'resilience' and 'character'.*

g) *As part of the personal development judgement, the inspectorate should consider the effectiveness of relationships and (sex), and health education in promoting 'healthy living'.*

h) *In reference to bullet point 4: The inspectorate should broaden this intention to recognise the needs and experiences of other groups of learners such as young carers, looked after children and refugee and migrant children and young people to name a few.*

Leadership and management:

i) *The provider creates a whole school culture and positive learning environment, which fosters resilience, wellbeing, and good mental health for both learners and professionals. Early support is provided where difficulties arise.*

j) *The provider has a culture of safeguarding that facilitates effective arrangements to: identify learners who may need early help in relation to **mental or physical health needs, special educational needs**, or who are at risk of neglect, abuse, grooming or exploitation; help learners reduce their risk of harm by securing the support they need, or referring in a timely way to those who have the expertise to help; and manage safe recruitment and allegations about adults who may be a risk to learners and vulnerable adults.*

k) *The provider identifies children with emerging mental health issues and helps them to get the support they need*

l) *Inspectors should speak to leadership teams and other staff to understand if a whole-school approach to mental health and wellbeing is in place and if all staff have a full understanding of the value of this and how support should be provided.*

m) *Inspectors consider how the learning environment successfully helps the whole school community understand the impact of lifestyle choices and behaviours on the own and others present and future physical and mental health and wellbeing.*

Quality of education:

n) *Ofsted should include an additional bullet point in paragraph 168 of the draft school inspection handbook saying, "If applicable, teachers use assessment to identify issues with subjective wellbeing and have in place clear processes to act on the information generated".*
o) *Ofsted should consider strengthening this intention by requiring schools to equip children and young people with the knowledge they need to be"…be **happy, healthy and successful in life**".*
p) *Inspectors should consider how well the learning environment supports teaching and learning of high quality to maximise the physical and mental health and wellbeing of the whole school community.*

Ofsted Education Inspection Framework 2019: proposed judgements

1.1. Behaviour and attitudes:

CYPMHC and the PWBMHS welcomes the separation of the former "personal development, behaviour and welfare" judgment by replacing it with two distinct judgements "behaviour and attitudes" and "personal development".

We are broadly supportive of this new judgement category. A positive school environment yields productive pupils who display good behaviours and attitudes to learning. While we support this new judgement, we have identified the following as being important to the promotion of learners' behaviour and attitudes.

1.2. Recognising and responding to the drivers of poor behaviour, including conduct problems

Children's behaviour and attitudes can change over time depending both the support they receive and the circumstances they face. Therefore 'behaviour and attitudes' must not be seen as static concepts.

We believe the requirements under this category do not go far enough in recognising the underlying causes of poor behaviour including when this goes beyond 'bad behaviour' and may be an indicator of persistent and/or severe behavioural problems (conduct disorders).

The Department for Education's guidance on Mental Health and Behaviour in Schools, states "…where there are concerns about behaviour, the school should instigate an assessment to determine whether there are any underlying factors such as undiagnosed learning difficulties, difficulties with speech and language, child protection concerns, or mental health problems."[2]

Furthermore, the guidance calls on schools to "…*develop a whole school behaviour policy, which includes measures to prevent and tackle bullying, along with setting out a clear system of rewards and sanctions. **This should be paired with an individualised,***

***graduated response when the behaviour might be a result of educational, mental health, other needs or vulnerabilities.*"[3]**

As is currently outlined in the draft framework, the burden of responsibility relies too heavily on the learner, for example, the inspectorate seeks to evaluate the extent to which '*they are committed to their learning, know how to study effectively, are resilient to setbacks*…'[4] without detailing any mechanisms for supporting this or acknowledging the underlying and external causes of behavioural difficulties. Poor behaviour and attitudes to learning can be a sign a child is facing distressing problems at home or unhelpful influences in the community according to Barnardo's.[5]

- Risk factors associated with conduct disorders

It is also vital that schools and colleges recognise and respond to the needs of pupils with emerging and established serious behavioural problems. Conduct disorders are our most common childhood mental health issue.[6] Research by the Centre for Mental Health and University College London have identified the following as potential early risk factors for the development of conduct problems[7]:

- Low parental education
- Low income
- Single parenthood
- Teenage mother
- Conflict in parent-child relationship
- Developmental delay

Other risk factors also worth noting is unmet Special Educational Needs and Disabilities (SEND) and Attention deficit hyperactivity disorder (ADHD).

- The impact of adversity and links to risky/challenging behaviour

Children and young people who have experienced significant adversity are more likely to adopt risky or challenging behaviour, such displaying harmful sexual behaviours and substance misuse.[8] According to YoungMinds, the response these young people receive from services focusses too heavily on managing their behaviours rather than identifying the causes.[9] The charity has developed a useful infographic highlighting the prevalence and risk factors associated with childhood adversity.[10]

1.3.   Unmet speech, language and communication needs (SLCN)

In some cases, unidentified and unsupported speech, language and communication needs (SLCN) can also be a driver of poor behaviour. In a meta-analysis of 22 studies, 81% of children with emotional and behavioural disorders were found to have significant language impairments which had not previously been identified.[11] More information is available in the RCSLT factsheet, *Understanding the links between communication and behaviour*: https://www.rcslt.org/-/media/Project/RCSLT/rcslt-behaviour-a4-factsheet.pdf

1.4.   School exclusions

This judgement category also does not go far enough in identifying the underlying factors that lead to exclusions and the need for education providers to prevent them in the first place. Excluded pupils are the most vulnerable in our society. According to IPPR, they twice as likely to be in the care of the state, four times more likely to have grown up in poverty,

seven times more likely to have a special educational need and 10 times more likely to suffer recognised mental health problems.[12]

Exclusions are rarely in the best interests of the child and excluding a child can have a significant impact on their mental health. Schools should be rewarded for being inclusive. Findings highlighted in Ofsted's overview of the research shows a bi-directional relationship between school exclusions and mental health problems.[13] Tackling mental health problems at school can therefore help to prevent exclusions in the first place and the related development of further mental health problems. The Education Select Committee has also written a highly critical report on Alternative Provision, the destination for a large number of excluded pupils.[14]

1.5. Use of isolation

There are growing concerns about the use of internal isolation methods, i.e. 'isolation booths' to remove pupils who are deemed too disruptive. The inspectorate should consider the impact of the inappropriate use of internal isolation on learner's behaviour and attitudes. For example, whether pupils with SEN or mental health needs are being placed in such settings due to the lack of support or whether pupils are spending unreasonable/extended periods of time in these settings. An investigation by the BBC News last year found that over 200 pupils spent at least five straight days in isolation booths in schools in England last year.[15] The investigation also found that more than 5,000 children with special educational needs also attended isolation rooms at some stage.

A study focussing on seclusions and restraint by the Challenging Behaviour Foundation surveyed parents of children with learning disabilities and autism and found that 88% of respondents reported that their children had experienced restraint and 71% had been secluded. For 21% of these children, seclusion was a daily experience. 91% of families surveyed said that their child had been negatively emotionally affected by restraint or seclusion and 58% reported physical injuries.[16]

1.6. Responding appropriately to poor attendance and punctuality

Under this category, the inspectorate seeks to examine the extent to which learners have high attendance and are punctual. It is important that Ofsted also looks at how education providers identify and address the reasons for poor attendance and punctuality, such as family related reasons (i.e. caring responsibilities) or mental health problems. Parental alcohol or substance misuse may also impact on a pupil's attendance and punctuality.[17]

Children and young people with caring responsibilities may also face issues around attendance and punctuality. Feedback from the joint Young Carers in Schools programme between the Carers Trust and The Children's Society and our Network of local carers services was that schools aware of this driver were encouraged to make an improved offer of support to the young carers in their school. There is a risk that without a prompt to inspectors, the needs of young carers are more likely to be overlooked and forgotten by schools.

There is not enough detail on the effects of these wider factors on children and young people attending school. Education providers need permission to make reasonable adjustments for these pupils. Ofsted must also be clear about the mechanisms to measure and record events that happen in a child's life outside of school which can have an effect on the wellbeing and mental health of learners and that schools have no control over.

1.7.   Working with parents and carers

Parents and carers play a crucial role in their child's learning and development, including their behaviour and attitudes to learning. The Department for Education's departmental guide on "Mental Health and Behaviour in School" states that "…where support is provided to help manage behaviour at home, alongside work being carried out with the child at school, there is a much greater likelihood of success in reducing the child's problems, and in supporting their academic and emotional development."[18] As part of their assessment, inspectors should look at how education providers work with parents and carers to reinforce positive behaviours and attitudes at home and effectively manage poor behaviour.

Case study: Incredible Years Basic Parenting Programme in Ireland

In Ireland, the Clondalkin Partnership launched the Incredible Years Basic Parenting Programme to create community-based solutions to emotional and behavioural problems that develop within the child's home, school and community. This found significant benefits for parents, both personally and in terms of their improved relationships with their child, as well an overwhelmingly positive view of the Incredible Years program itself.[19]

1.8.   Bullying and discrimination

Bullying and discrimination in education settings should never be tolerated. While we support the inspectorate's laudable ambition to promote a positive culture in this respect, we believe that it is an unrealistic expectation to suggest that learners "do not" experience bullying or discrimination. We are concerned that this could discourage education providers from transparency, incentivising them to report that there's an absence of such bullying and discrimination when evidence indicates some issues are on the rise.

Around two in five young people say they have experienced bullying in some form in the last year, including cyber-bullying[20]. Analysis by the Guardian last year revealed record numbers of pupils are excluded from school as a result of racist or discriminatory bullying.[21] The scale of sexual harassment and bullying in schools is also deeply worrying.[22] Bullying and discrimination can have a profound impact on learners' wellbeing and mental health.

Recommendations:

We propose that Ofsted add the following point, developed in Partnership with Young Minds, in the Behaviour and Attitudes judgement in the framework.

   a) *The provider's approach to behaviour management emphasises the importance of identifying and addressing the underlying causes of behaviour".*
   b) *The new judgement category be renamed 'Behaviour, attitudes and inclusion' to shift the emphasis away from behaviour management that involves exclusion.*
   c) *The provider should work closely with parents and carers to promote their child's behaviour and positive attitudes to learning.*
   d) *The Department for Education's review of exclusion from school, led by Edward Timpson CBE, should also be used to further inform the inspectorate's approach in relation to the causes and response to school exclusion[23].*
   e) *The inspectorate should consider rewording their judgement so that there is a clear expectation that learners '**should not**' experience bullying or discrimination rather than 'do not'.*

2. **Personal development:**

We are of the view that this new category is a better reflection of what takes place in education settings and how this fosters pupil's personal development. We welcome the inspectorate's emphasis to look 'beyond the academic, technical and vocational' and examine the approach taken by providers to foster personal development. This could go a step further in emphasising a more 'grounded and well rounded' education that encourages pupils to consider vocational as well as academic study.

Under this judgement, the draft framework includes positive language and objectives which we hope will help the inspectorate readily identify good practice, such as the need to keep 'physically *and* mentally healthy' and the building of 'resilience'.

While we welcome the overall aims set out in this new judgement, we have outlined the below for further consideration.

2.1. **Celebrating pupils' achievements**
Celebrating the progress and achievements of every learner can help increase their wellbeing and self-confidence. Ofsted should explore how schools celebrate successes associated with learners' personal development. The inspectorate should look for creative approaches to recognising children and young people's individual developments including what they achieve within their communities.

2.2. **Clarifying language and concepts**
The inspectorate should clearly define (either within the framework or handbook) of what they mean by concepts such 'character', 'resilience' and 'fundamental British values'. There is no shared definition of these terms and therefore no reliable way to measure them. There is also a need for some understanding of how these 'traits' are developed and taught, including to different groups of children. It is vital these terms and definitions allow for and encourage help-seeking behaviour, not just stoicism.

In order to be consistent with the Government's Relationships Education, Relationships and Sex Education (RSE) and Health Education Draft statutory guidance, Ofsted could define character traits in the same way: "…such as helping pupils to believe they can achieve, persevere with tasks, work towards long-term rewards and continue despite setbacks. Alongside understanding the importance of self-respect and self-worth, pupils should develop personal attributes including honesty, integrity, courage, humility, kindness, generosity, trustworthiness and a sense of justice."[24]

2.3. **Relationships and (sex), and health education to promote 'healthy living'**
Under the personal development category, we believe there is a need for more of a focus on the role of relationships and health education to help promote 'healthy living' as identified by the inspectorate. The roll of the new statutory curriculum from 2020 will require all schools to implement age-appropriate lessons to promote both the physical and mental health of learners. This will help equip children and young people with the vital skills and knowledge they need to spot the signs of poor health and how to seek help.

Young people should also gain an understanding at an early stage of the impact of relationships such as friendships, family relationships and harmful relationships such as

bullying on their wellbeing. It is important positive relationships and 'social connectedness' including with pupils and staff are well reflected in the judgements.

2.4. Promoting respect and tackling inequality

Under this judgement, the inspectorate rightly identifies the need to prepare learners for modern life whilst promoting respect for the different protected characteristics as defined by the law. The inspectorate should broaden this intention to recognise the needs and experiences of other groups of learners such as young carers, looked after children and refugee and migrant children and young people to name a few.

Recommendations:
> f) *Ofsted should evaluate education provider's approach to recognising and celebrating the extracurricular achievements and progress made by learners.*
> g) *The inspectorate should incorporate clear definitions, in either the framework or handbook, of what they mean by concepts such as 'resilience' and 'character'.*
> h) *As part of the personal development judgement, the inspectorate should consider the effectiveness of relationships and (sex), and health education in promoting 'healthy living'.*
> i) *In reference to bullet point 4: The inspectorate should broaden this intention to recognise the needs and experiences of other groups of learners such as young carers, looked after children and refugee and migrant children and young people to name a few.*

3. Leadership and management:

CYPMHC and PWBMHS strongly welcome the proposed changes made to this judgement, particularly the intentions to tackle 'off-rolling' through effective leadership and management and looking beyond performance data to evaluate a provider's approaches.

3.1. Promoting a whole-school and college approach to mental health and wellbeing

Ofsted's document '*Education Inspection Framework: Overview of the Research'* recognises the benefit of a whole school approach to mental health and wellbeing. The overview of the research states:

 "In terms of intervention, it would appear that the most effective approaches focus broadly on well-being and promote strengths rather than primarily focusing on poor mental health. A whole-school approach that incorporates these factors in the curriculum as well as targeted support, staff development, working with parents and developing a positive climate, has been found to have a positive effect on both physical and mental health (Public Health England, 2015)."

Ofsted's Overview of the Research also emphasises the importance of a *well-coordinated* whole school approach citing Professor Weare, who was commissioned by the Partnership for Mental Health and Wellbeing In Schools to analyse the evidence on whole schools approaches to mental health and wellbeing:

"Evaluations typically show that well-coordinated whole-school approaches are most likely to have an impact, while uncoordinated small-scale interventions are not. Support from the senior leadership team is essential (Weare, 2015; Banerjee et al, 2014)."

There currently is no inclusion of a *whole school* approach to mental health and wellbeing in the framework or the handbook. A *well-coordinated* whole school and college approach to mental health and wellbeing should be included in the framework and the handbook, to ensure schools are recognised for implementing this approach.

The Department for Education's Advice on Mental Health and Behaviour in Schools (2018) explicitly states: "A school's approach to mental health and behaviour should be part of a consistent whole school approach to mental health and wellbeing."

The Advice elaborates that:

"A whole school approach is one that goes beyond the teaching in the classroom to pervade all aspects of school life, including:

- culture, ethos and environment: the health and wellbeing of pupils and staff is promoted through the 'hidden' or 'informal' curriculum, including leadership practice, the school's policies, values and attitudes, together with the social and physical environment;
- teaching: using the curriculum to develop pupils' knowledge about health and wellbeing; and
- partnerships with families and the community: proactive engagement with families, outside agencies, and the wider community to promote consistent support for children's health and wellbeing."[25]

CASE STUDY: How prioritising wellbeing can drive change in a school

Lessness Heath Primary School in south east London responded to being placed in special measures by placing the whole-school's wellbeing at the heart of its strategy to drive improvement. Three years on and the school is now rated good (and outstanding in many areas) by Ofsted and was among the first to receive the Wellbeing Award for Schools from the National Children's Bureau and Optimus Education.

The school put in place a bold whole-school approach to wellbeing. It prioritised its limited resources to employ a full-time, fully trained counsellor to lead the wellbeing programme. This staff member focused solely on pupils' wellbeing with no other teaching responsibilities.

Pupils learn the importance of core values like bravery, respect and responsibility, and are encouraged to express feelings and moods in a constructive and reflective way. They learn self-management techniques like mindfulness and support each other by electing 'wellbeing ambassadors' in every class. The voices of pupils are central to the wellbeing strategy.

Within the wider school community, the school responded to staff concerns about workloads by removing requirements to mark books outside school time; a move reflected in a renewed enthusiasm for the core business of teaching.

> The approach has rebuilt trust with parents who are actively involved in the wellbeing strategy and who benefit from regular parenting classes and peer support meetings, generating a powerful sense of shared purpose between school and home.

Professor Weare, in her paper commissioned by the Partnership for Mental Health and Wellbeing in Schools cites there is clear evidence from well-conducted systematic reviews to support schools in a whole school approach to promoting social and emotional well-being and responding to mental health. These evidence-based approaches include: adopting a whole school thinking; engage the whole community; prioritise professional learning and staff development; implement targeted programmes and interventions (including through the curriculum); develop supportive policy; connect appropriately with approaches to behaviour management; and implement responses and identify specialist pathways. (Weare 2015.[26]

It is crucial that Ofsted aligns the education inspection framework with its own *Overview of the Research,* with the Department for Education Advice and academic evidence, and incentivises and recognises schools for implementing a whole school approach to mental health and wellbeing.

The below key elements are also crucial to the implementation of a whole school and college approach:

o **The wellbeing and development of professionals in schools:**

The framework acknowledges the 'main pressures' on staff and their workload but there is a need to focus on proactive support to prevent the accumulation of these pressures and the negative consequences associated with them such as stress. Teachers and leaders need to balance having a manageable workload with the high level of responsibility.

Furthermore, there is a need for overall responsibility in the promotion of positive working environments for staff and anti-discriminatory workplace practices. This will enable more proactive interventions and preventative steps to be taken. There is currently a 'proactive versus reactive' tension within the framework, for example, 'leaders protect their staff from bullying and harassment' instead of a requirement to reduce or prevent such instances.

There is also a need to assess the quality and availability of teacher training and Continuing Professional Development (CPD) opportunities within education settings and the strategies that are in place retain and nurture the careers of teachers and other key staff members.

o **Working with parents, carers and the wider community:**

The draft inspection framework acknowledges the importance of senior leaders engaging effectively with learners, the wider community and 'where relevant' their parents/carers, employers and local services. Our members feel strongly that parents/carers are ***always*** relevant, and staff should encourage and empower parents and carers as role models for their children. For example, parents can role model healthy positive relationships, help seeking, promotion of physical and mental wellbeing.

- in school: in terms of reinforcing a whole school approach
- at home: in terms of safeguarding, mental health and a strong parent-child connection

It is encouraging that the role of parents, carers and the wider community and services is recognised, and schools are being encouraged to proactively engage with trusted adults at home to support the development of children's skills and understanding. The sharing of best practice in this regard would be welcomed, with advice on how to reach harder to reach or vulnerable groups and how to tackle sensitive issues.

3.2. There is a need for a balance between expectations and schools' ethos

The physical, social and emotional environment in which staff and students spend a high proportion of every week day has been shown to affect their physical, emotional and mental health and wellbeing as well as impacting on attainment.[27] Relationships between staff and students, and between students, are critical in promoting student wellbeing and in helping to engender a sense of belonging to and liking of school or college.[28]

3.3. Providing or signposting to mental health support

It is key that if a child or young person does seek help, that appropriate support, including mental health support, is available to them. The latest NHS Digital prevalence study of children and young people experiencing mental disorders shows that teachers were the most cited source (48.5%) of support for children and young people.[29] As it currently stands, there is an extremely limited use of psychological evidence and research to support the new proposed approaches. Some of the psychological evidence that has been used is out of date.

Young people must not be in a position where they are encouraged to seek support for mental health challenges, and then that support is not available to them. Pathways to support should be mapped out in school and college, including those delivered both within the school, such as school nursing services or external support such as NHS services or voluntary and community-based support.

Training for teachers in mental health and wellbeing education will need to link in with other initiatives on mental health such as mental health first aid programmes in schools and the Designated Senior Leads for Mental Health in Schools as announced in Transforming Children and Young People's Mental Health Provision: A Green Paper.
Recommendations:

We propose that Ofsted add the following point, developed in Partnership with Young Minds, to the leadership and management judgement in the framework:

j) *The provider creates a whole school culture and positive learning environment, which fosters resilience, wellbeing, and good mental health for both learners and professionals. Early support is provided where difficulties arise.*
k) *The provider has a culture of safeguarding that facilitates effective arrangements to: identify learners who may need early help in relation to **mental or physical health needs, special educational needs**, or who are at risk of neglect, abuse, grooming or exploitation; help learners reduce their risk of harm by securing the support they need, or referring in a timely way to those who have the expertise to help; and manage safe recruitment and allegations about adults who may be a risk to learners and vulnerable adults.*
l) *The provider identifies children with emerging mental health issues and helps them to get the support they need*

m) *Inspectors should speak to leadership teams and other staff to understand if a whole-school approach to mental health and wellbeing is in place and if all staff have a full understanding of the value of this and how support should be provided.*

n) *Inspectors consider how the learning environment successfully helps the whole school community understand the impact of lifestyle choices and behaviours on the own and others present and future physical and mental health and wellbeing.*

4. Quality of education:

4.1.   Ofsted's quality of education section sets out expectations around assessment. It is welcome that Ofsted is being clear that assessment should be focused and purposeful, but we would like to see reference to assessment used for wellbeing. Otherwise we are concerned that Ofsted's criteria could disincentivise the use of wellbeing measures (on which the DfE is shortly going to be issuing guidance).

4.2.   In the draft Education Inspection Framework, paragraph 25, first bullet point under 'Intent', Ofsted writes that school leaders should "adopt or construct a curriculum that is ambitious and designed to give all learners, particularly the most disadvantaged, the knowledge and cultural capital they need to **succeed in life**."

Recommendations:

q) *Ofsted should include an additional bullet point in paragraph 168 of the draft school inspection handbook saying, "If applicable, teachers use assessment to identify issues with subjective wellbeing and have in place clear processes to act on the information generated".*

r) *Ofsted should consider strengthening this intention by requiring schools to equip children and young people with the knowledge they need to be"…be **happy, healthy and successful in life**".*

s) *Inspectors should consider how well the learning environment supports teaching and learning of high quality to maximise the physical and mental health and wellbeing of the whole school community.*

5. OTHER/GENERAL COMMENTS

5.1. Assessing and rewarding schools on proactive approaches:

Currently, there is little to no reference in framework about the responsibility of the school to proactively create an environment conducive to good wellbeing for students. This point extends across all the judgement areas. We believe this a missed opportunity for greater proactivity on issues such as staff bullying, school responsibility for positive environment for staff/student wellbeing and sharing best practice within community.

We also want to ensure that we are not just responding to children and young people who are in crisis, a change in the language to wellbeing may help to shift the focus. Ofsted's *Overview of the Research* identifies the benefits of a positive approach to wellbeing, rather than just focusing on poor mental health: "In terms of intervention, it would appear that the most effective approaches focus broadly on well-being and promote strengths rather than primarily focusing on poor mental health". Wellbeing is not mentioned in this regard in the framework or the handbook and positive approaches to promoting wellbeing should be incorporated in to both documents, rather than just focussing on the negative risks. Ofsted's *Overview of the Research* also highlights there is no conflict, between a focus on wellbeing and a focus on attainment.

> **Example: Mindfulness**
> There are a variety of approaches that schools can use to promote wellbeing. For instance, the organisation Mindfulness in Schools highlights the tangible benefits of mindfulness. These include improved stress regulation and reduction, increased self-compassion, a greater awareness of relationships and how to manage them, improved concentration and capacity to deal with difficult thoughts and emotions, and greater mental clarity.

"There is often a tendency to see a focus on well-being as being in contradiction to a focus on the academic curriculum. There is, however, little evidence for this. Certainly, within Western education systems there is limited support of a negative correlation between measures of well-being and a focus on learning in most studies, with either no relationship or a weak positive relationship typically found (Opdenakker & Van Damme, 2000; Vignoles & Meschi, 2010; Van Petegem et al, 2008)."

This lack of conflict between wellbeing and attainment should be made explicit in the handbooks, so that inspectors are clear about there is not a contradiction.

5.2. Training and support for inspectors

We would like to see more details on the training provided for Ofsted Inspectors, including how inspectors are trained to recognise and understand the culture and context that schools are individually operating in. e.g. financial, local services and access to specialist support

Ofsted should also include some guidance within the handbook to support inspectors to balance the different themes within the framework e.g. academic attainment & personal development/ emotional wellbeing etc.

5.3. Young NCB Perspective on Ofsted consulting with young people including on mental health and wellbeing

Young NCB members see Ofsted's direct engagement with children and young people (CYP) as being vital to understanding the lived experiences of school pupils, and therefore garner an in-depth perspective of a school's strengths and challenges.

Aside from fulfilling their right to have a voice in the decisions that affect their lives, CYP stressed the importance of inspectors having an awareness of non-academic school experiences, which can only be understood fully by hearing from CYP themselves. They highlighted that the aspects of school life that matter most to CYP may differ from the aspects prioritised by professionals, and therefore CYP perspectives are key to providing an insight into the holistic school experience. In particular, they emphasised the need to focus on students' mental health and wellbeing, ensuring that schools are promoting positive mental health and providing support for those at risk of mental ill health or already in need of support. In addition, they acknowledged that different CYP have very different experiences even within the same school, so hearing from a wide range of pupils (including those who have lower academic ability, have been or are currently excluded and/or have special educational needs or disabilities) will enable inspectors to identify whether or not the school meets a wide variety of needs. Above all, YNCB members were clear that students will give a frank, honest perspective on the school, whereas they were concerned that teachers are obliged to 'show the school in its best light.'

Regarding interactions between Ofsted inspectors and school pupils, YNCB members were clear that there is not 'one size fits all' approach. In order to listen meaningfully to a range of voices, Ofsted and school staff should facilitate a range of engagement opportunities. While YNCB members did not mind what these opportunities were, they recommended including: an anonymous feedback activity, a discussion with a range of CYP who have prepared in advance, and encouraging ad-hoc conversations with inspectors. They were clear that school staff involvement in these should be minimal, that CYP involvement must be voluntary and that they must occur in situation where CYP feel comfortable.

5.4. The wider context:

There are a number of relevant initiatives underway relating to children and young people's mental health and wellbeing, including the expansion of provision in education-based settings. Below is a list of the key activities

- On-going implementation of Future in Mind[30] and NHS Five Year Forward View[31] with the commitment of 70,000 additional children and young people each year will receiving evidence-based treatment.
- Implementation of the Transforming children and young people's mental health provision: a green paper.[32]
- Mental Health First Aid offer to all secondary schools in England.
- Statutory Relationships (and sex) and Health Education from September 2020.
- Randomised Control Trials in schools launched.
- NHS Long Term Plan; additional commitment to test approaches for children and young people in out of school settings.

The proposals set out in the Green Paper are particularly welcome. The role of the Designated Senior Lead and Mental Health Support Teams must eventually form part of the whole school approach. The promotion of a whole school approach must however not sit within a single staff member's remit.

5.5. Measuring wellbeing in Welsh schools: learning from ESTYN

Estyn, the Welsh schools' inspectorate, has been using its current common inspection framework (CIF)[33] for all schools since September 2017. The CIF is complemented by a range of guidance for different sectors[34] and supplementary guidance[35] on specific themes. Before introducing the new CIF, Estyn evaluated the previous framework, piloted new ways of working and held wide consultations with stakeholders about the proposed changes.

Estyn's approach to inspecting wellbeing was strengthened as part of the changes. For example, Estyn refined how it uses objective data as a measure of wellbeing (such as attendance rates in a school compared to those in similar schools) and increased the opportunities to listen to learners (for example, spending more time listening to learners during inspections and improving the use of pre-inspection questionnaires).

In 2017, the Welsh Schools' Chief Inspector, supported by the then Cabinet Secretary for Education, commissioned an independent review of key aspects of Estyn's role and operation. The review's prime purpose was to analyse the implications of the Welsh educational reform agenda for the work of Estyn, with a particular focus on school inspections. The report from this review was published in June 2018, and includes

comments on how wellbeing features in inspections. For example, "*strong and inclusive schools committed to excellence, equity and wellbeing*".[36]

A recent article on the inspectorate's website[37] has also set out how Estyn's role in the evaluation and improvement arrangements in schools is likely to change in light of this report and the major changes ahead in education in Wales.

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