

# Written submission by the Sport and Recreation Alliance Ofsted Education Inspection Framework: Inspecting the Substance of Education

## 1. Introduction

- 1.1 The Sport and Recreation Alliance (the Alliance) is the representative body for the sport and recreation sector, with a diverse membership of more than 325 national and local organisations across the sport and recreation sector. As the voice of the sector, we work with Government, policy makers and the media to make sure grassroots sport and recreation grows and thrives.
- 1.2 The importance of the provision of a wide-ranging sport and physical activity opportunities for children and young people cannot be overstated, and the education system must be a key enabler of this.
- 1.3 The inspection framework must ensure that schools and providers offer a broad and high-quality Physical Education (PE) curriculum offer and wider opportunities for learners to be active outside of the curriculum, with providers effectively held to account.

## 2. **Proposal 1 – To what extent do you agree or disagree with the proposal to introduce a ‘quality of education’ judgement?**

- 2.1 We strongly agree with this proposal.
- 2.2 We welcome the proposal to introduce a ‘quality of education’ judgement and hope that this will help enable a more holistic approach to help optimise the substance of education for learners.
- 2.3 This judgement and the constituent parts – intent, implementation and impact – must be applied to the PE curriculum and wider sport and physical activity provision, ensuring that education providers deliver against:
  - 2.3.1 *Intent*: the PE curriculum offering should be sufficiently broad and well structured.
  - 2.3.2 *Implementation*: teachers must be properly equipped to deliver PE and broader non-curriculum sport and physical activity opportunities, using assessment as appropriate.
  - 2.3.3 *Impact*: providers must seek to ensure that learners develop the right skills and knowledge to progress to the next stage of learning – in particular it must be recognised that physical literacy enables personal and emotional development from learners’ early years.

- 2.4 That being said, inspectors must have the ability to recognise varying levels of delivery across a range of different subjects and must understand the subtle nuances between the roles of PE as part of the curriculum and sport and physical activity beyond the curriculum. Inspectors must be supported through CPD to ensure they have appropriate understanding to recognise both the overt and more subtle evidence of a high-quality PE curriculum offer and wider non-curriculum activity opportunities. Consistency of inspection standard must be assured.
- 2.5 We would also question how the impact for learners might reasonably be assessed. We are concerned that this might be particularly difficult to form a definitive judgement on, and with this element of the quality of education judgement particularly crucial, this should be clarified within the final version of the framework.
- 2.6 For example, page 11 of the draft education inspection framework comments that learners' knowledge and skills will be reflected in tests or examinations "where relevant", but where vocational courses and/or overtly practical elements of the curriculum exist, the impact for learners can be expected to be less clearly or directly measurable. Page 11 also details that inspectors will judge how far "learners are ready for the next stage of education, employment or training", but again how this will reasonably be assessed should be clarified.
- 2.7 An equal weighting must be placed on prescribed core and foundation subjects alike. Ofsted must ensure that this is applied within the final inspection framework, or we will see subjects like PE continue to be deprioritised by providers who choose to narrow their curriculum, choosing short-term over long-term gains. If providers' impact is to be a key tenet at the heart of inspectors' 'quality of education' judgement, the long-term personal, emotional and physical development which PE enables must be prioritised to the same level as core subjects' short-term examination assessments.

**3. 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?**

- 3.1 We strongly agree with this proposal.
- 3.2 We welcome this proposed separation. We must ensure that the education system prepares learners beyond the direct application of curriculum knowledge and skills, and markedly prioritises co-curricular learning and activities that enable learners to develop their confidence, character and resilience, and learn how to optimise their own physical and mental wellbeing.
- 3.3 Opportunities to be active within the school day, including but not limited to the PE curriculum, are well placed to support this wider personal development.
- 3.4 As such, individual wellbeing (both physical and mental) should be detailed as a key element of personal development within each inspection handbook, rather than as a subset of cultural development as within the current draft documents. This would reflect the recent introduction of compulsory health education into the national curriculum and would reaffirm government's commitment to an important message: physical and mental wellbeing must be at the heart of the education system.
- 3.5 Ofsted should consider explicitly detailing how far the provider offers a broad range of regular (daily), defined opportunities for learners to be active, both within and beyond delivery of the curriculum, as

a measure for inspectors to evaluate to inform their judgement on the personal development of learners.

#### **4. Additional comments on the early years draft inspection framework:**

- 4.1 We are concerned that the draft early years inspection framework indicates that inspectors will be almost exclusively focused on young children being school-ready from a literacy and numeracy perspective rather than promoting physical development. Building children's physical literacy from their early years must be a priority for Ofsted, inspectors and all providers.
- 4.2 On page 29 of the draft inspection framework, it is detailed that inspectors should consider the six listed criteria to inform their overall effectiveness judgement but makes no reference to physical literacy and development. We encourage Ofsted to also include an additional key criterion related to the level and quality of provision for learners to be physically active, to enhance their individual wellbeing and support their personal, emotional and physical development from an early age.

#### **5. Additional comments on the school draft inspection handbook:**

- 5.1 We welcome the inclusion of "developing pupils understanding of how to keep physically health and maintain an active lifestyle, including giving ample opportunities for pupils to be active during the school day and through extra-curricular activities" in paragraph 202 on page 57 of the draft handbook.
- 5.2 We would however note our concern around the language "ample opportunities" and would encourage Ofsted to consider revising this to read "a broad range of regular (daily), defined opportunities for pupils to be active".
- 5.3 Likewise, we would encourage Ofsted to also explicitly detail this as a measure for inspectors to evaluate to inform their judgement on the quality of early years education in schools. Schools should be providing a broad range of regular (daily), defined opportunities for pupils of all ages – detailing this as an additional consideration in paragraph 258 of the draft handbook would be a valuable addition.
- 5.4 Schools should be expected to engage with national governing bodies of sport and local community sport club networks to support the provision of extra-curricular activities for all pupils as well. To this end, Ofsted should consider where such collaboration and partnership working might be included in the inspection evaluation framework as a measure to inform inspectors' judgements.
- 5.5 Ofsted should also consider how far pupils are reasonably able to contribute to decisions around what these opportunities might be, when and where they might be delivered. Some pupils will not aspire to be active, but schools giving them the opportunity to influence the direction and delivery of such activities will support engagement whilst also supporting pupils' wellbeing and wider personal development.
- 5.6 Beyond this, we are very concerned that reporting of the Primary PE and Sport Premium (PESP) is not detailed within the draft inspection framework. Schools compliance with both the impact and accountability requirements of PESP funding must be included within inspectors' judgements.
- 5.7 Where the pupil premium is detailed (in paragraph 226 on page 65 of the draft handbook) as a consideration within inspector's judgement as to the leadership and management of the school, the same consideration must also be applied to the PESP.

- 5.8 Inspectors must be required to gather evidence for the PESP on the three issues listed for the pupil premium in paragraph 226 – in particular, the level of PESP funding received by the school and how leaders and governors have spent their PESP, their rationale and intended impact – plus the following as additional issues relating to schools' use of the PESP:
- 9.8.1 How far leaders and governors have made use of available guidance from the Department for Education, the Youth Sports Trust and the Association for Physical Education, amongst others, to inform their spending of the PESP;
- 9.8.2 How far leaders and governors have transparently reported their spending of the PESP on their websites and in returns of wider information to the Department for Education.
- 9.8.3 Whether leaders and governors have reported and published the percentage of year 6 pupils who meet the national curriculum requirement regarding swimming competence, confidence and proficiency.

**6. Additional comments on the non-association independent schools draft inspection handbook:**

- 6.1 We welcome the inclusion of “developing pupils’ understanding of how to keep physically health and maintain an active lifestyle, including giving ample opportunities for pupils to be active during the school day and through extra-curricular activities” in paragraph 192 on page 48 of the draft handbook.
- 6.2 We would however note our concern around the language “ample opportunities”, and would encourage Ofsted to consider revising this to read “a broad range of regular (daily), defined opportunities for pupils to be active”.
- 6.3 Likewise, we would encourage Ofsted to also explicitly detail this as a measure for inspectors to evaluate to inform their judgement on the quality of early years education in schools. Schools should be providing a broad range of regular (daily), defined opportunities for pupils of all ages – detailing this as an additional consideration in paragraph 245 of the draft handbook would be a valuable addition.
- 6.4 Independent schools should be expected to engage with national governing bodies of sport and local community sport club networks to support the provision of extra-curricular activities for all pupils as well. To this end, Ofsted should consider where such collaboration and partnership working might be included in the inspection evaluation framework as a measure to inform inspectors’ judgements.
- 6.5 Beyond this, Ofsted should consider how far pupils are reasonably able to contribute to decisions around what these opportunities might be, when and where they might be delivered. Some pupils will not aspire to be active, but schools giving them the opportunity to influence the direction and delivery of such activities will support engagement whilst also supporting pupils’ wellbeing and wider personal development.

**7. Additional comments on the further education and skills draft inspection handbook:**

- 7.1 We welcome the inclusion of “keeping physically and mentally health” in paragraph 216 on page 49 of the draft handbook as one dimension which helps inform inspectors’ judgement of how far the provider enables learners’ personal development.

- 7.2 We would however note our concern that there is little clarity as to how opportunities to support this might be presented and would encourage Ofsted to consider revising paragraph 215 to specifically detail the provision of “a broad range of regular (daily), defined opportunities for learners to be active” as an expected provision to help keep them healthy, both physically and mentally.
- 7.3 Providers should be encouraged to engage with national governing bodies of sport and local community sport club networks to support the provision of extra-curricular activities for all learners as well. To this end, Ofsted should consider where such collaboration and partnership working might be included in the inspection evaluation framework as a measure to inform inspectors’ judgements.
- 7.4 Beyond this, Ofsted should also consider how far learners are reasonably able to contribute to decisions around what these opportunities might be, when and where they might be delivered – giving them the opportunity to influence the direction and delivery of such activities will support engagement whilst also supporting learners’ wellbeing and wider personal development.

**Sport and Recreation Alliance  
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