OFSTED, INSPECTIONS AND THE LAW

The inspection framework

1. OFSTED's common inspection framework applies to its inspections of maintained schools and academies under section 5 of the Education Act 2005, further education provision under section 125 of the Education and Inspections Act 2006, non-association independent schools under section 109 of the Education Act 2008, and registered early years settings under the Childcare Act 2006. It sets out the principles that apply to inspection and the main judgments that inspectors make when conducting such inspections.

2. The principal judgments are made on a four point scale where grade 1 is outstanding, grade 2 is good, grade 3 is "requires improvement" and grade 4 is inadequate. In addition to the overall effectiveness of the provision, this scale is applied to the effectiveness of leadership and management, quality of teaching, learning and assessment, personal development, behaviour and welfare, and the outcomes for children and learners.

3. The precise implications of those judgments being applied to a provision, or any part of it, varies depending on the type of provider and the applicable statutory scheme.

Schools

4. Section 5 of the Education Act 2005 imposes a duty on the Chief Inspector (who acts through OFSTED and will be referred to hereafter as "OFSTED" for simplicity) to (a) inspect all maintained schools[1] and academies at such intervals as may be prescribed and (b) when the inspection has been completed, to make a report of the inspection in writing.

5. A section 5 inspection is commonly referred to as a "full inspection". A further duty to inspect as requested to do so is imposed by section 8(1) of the 2005 Act, and section 8(2) provides that OFSTED may inspect any school in England where not required to do so by section 5 or 8(1).

6. Inspections under section 8 are generally either monitoring inspections, scheduled by OFSTED as set out below, or emergency inspections in response to particular concerns. There is no statutory duty to provide a formal report following a section 8 inspection.

7. The prescribed intervals for section 5 inspections are set at 5 years: regulation 3 of the Education (School Inspection) (England) Regulations 2005. Where however a school is awarded a grade of "good" or "outstanding" at a section 5 inspection, that period is

[1] By sub-section (2), community, foundation and voluntary schools, community and foundation special schools, maintained nursery schools, academy schools, alternative provision academies, city technology colleges, city colleges for the technology of the arts, and special schools approved for the time being under s342 of the Education Act 1996. Schools that are in the process of closing/discontinuing are exempted by sub-section (3).

effectively postponed so long as any intervening section 8 inspection determines that that grade would be likely to be maintained or improved on.

8. The consequences for schools of achieving a grade of good or better therefore include a lighter touch inspection regime, as well as being able to continue to point to the section 5 inspection report setting out the reasons why that grade was achieved – by section 11 of the 2005 Act, OFSTED may arrange for the publication of the report in such manner as is considered appropriate, and it is OFSTED's invariable policy to do so unless there are exceptional circumstances. A school that is judged to require improvement or to be inadequate, conversely, will bear the consequences not only of more frequent full inspections, but of the report to that effect being in the public domain.

9. A further duty is imposed by section 13 of the 2005 Act where on completion of a section 5 inspection OFSTED is of the opinion that either special measures or significant improvement are required. This duty is firstly procedural, in that the draft report stating that conclusion must be sent to the governing body of a maintained school or proprietor of any other school, and OFSTED must consider any comments on the draft that are made within 5 working days[2] before finalising the report. If at the end of that process OFSTED remains of the opinion that the school requires either special measures or significant improvement, notice must be given without delay to the Secretary of State and the local authority (if a maintained school) or the proprietor, and that opinion must be stated in the inspection report.

10. The criteria for judging whether a school requires special measures or significant improvement are set out in section 44 of the 2005 Act: special measures are required if (a) the school is failing to give its pupils an acceptable standard of education and (b) the persons responsible for leading, managing or governing the school are not demonstrating the capacity to secure the necessary improvement in the school. A school will require significant improvement if, although those conditions are not met, it is performing "significantly less well than it might in all the circumstances be expected to perform".

11. The consequences of a finding that a school falls within section 44 are, firstly, that – if a maintained school - it becomes eligible for intervention under Part 4 of the Education and Inspections Act 2006, which confers various powers on local authorities and the Secretary of State to, for example, require the governing body to enter into arrangements to receive advice or support, to appoint additional governors or an interim executive board, or to take over responsibility for an interim executive board.

12. The scope for use of those powers is now somewhat unclear given that, with effect from April 2016, a new section 4(A1) has been inserted into the Academies Act 2010 by the Education and Inspections Act 2016, imposing a duty on the Secretary of State to make an academy order in respect of any maintained school that is eligible for intervention under the

[2] The period prescribed by regulation 5 of the Education (School Inspections) (England) Regulations 2005

2006 Act. Those intervention powers will be definition then fall away, as the school will no longer be a maintained school.

13. The Education and Adoption Act 2016 also inserted new sections 2A and 2D into the Academies Act 2010, the combined effect of which is that the Secretary of State now has power to terminate an academy's funding agreement if it is found to require special measures or significant improvement, regardless of whether this was expressly a term of any academy agreement entered into before 18 April 2016 (and any funding agreement entered into after that date must contain such provision).

Further education

14. Section 125 of the Education and Inspections Act 2006 imposes a duty on OFSTED to inspect all institutions within the further education sector, and all 16 to 19 academies, unless exempted by the Further Education Institutions (Institutions Exempt from Inspection) Regulations 2012 – essentially where they have been judged to be outstanding.

15. A report must be made of any inspection under section 125, and there is a statutory duty for that report to be published in such manner as OFSTED considers appropriate. Section 126 of the 2006 Act makes broadly similar provision to that in section 8 of the 2005 Act in relation to schools, and the overall regime is similar, with "full" inspections under section 125 and monitoring or emergency inspections under section 126.

16. The intervals for inspection are not prescribed in regulations, but are specified by the Secretary of State and published by Ofsted. A provider judged good will be usually be re-inspected within 3 years, whilst if judged to require improvement there will be a full re-inspection within 12-24 months and "support and challenge" visits before this. A judgment of inadequate will lead to a first monitoring visit soon after publication of the report, with further visits before a full re-inspection.

17. Other than the more intense inspection regime, and the obvious negative consequences associated with a published report grading an institution as inadequate or requiring improvement, there are no express consequences for a further education institution awarded such a grade. There may however be consequences for its funding.

Independent schools

18. All independent schools must be registered with the Secretary of State under section 95 of the Education and Skills Act 2008. By section 106 of that Act, the Secretary of State may approve bodies other than OFSTED to carry out inspections of such institutions, either individually or as a category. An independent school that is not subscribed to such an independent inspectorate, however, is subject by section 108 to a similar inspection regime, in terms of frequency, reporting etc, to other schools and FE colleges as set out above.

19. Inspections of independent schools vary in that they must be carried out in order to assess compliance with the standards currently prescribed in the Education (Independent School

Standards) (England) Regulations 2010. If the Secretary of State is satisfied that any of those standard are not being met, the proprietor may be required under section 114 of the 2008 Act to submit an action plan specifying the steps that will be taken to ensure the relevant standard(s) are met and the time by which each step will be taken. If such an action plan is not complied with, or is rejected, or the standard continue not to be met on inspection by OFSTED or an independent inspectorate, the Secretary of State may take enforcement action under sections 115-118, either by imposing a restriction on the proprietor or removing the institution from the register. By sections 124 and 125, an institution may appeal to the First-tier Tribunal against a decision to take enforcement action, and by section 116(3) the enforcement action is suspended during that appeal process.

Early years

20. Providers of early years childcare must also be registered, in this case with OFSTED rather than the Secretary of State, under Chapter 2 of Part 3 of the Childcare Act 2006. The system for inspections is contained in sections 49 and 50 of the 2006 Act, and again is structured to provide for both full inspections and monitoring/emergency inspections. Publication of inspection reports is, on the fact of the statute, a power rather than a duty but OFSTED's policy is to publish absent exceptional circumstances.

21. Whilst there are no direct statutory consequences associated with a finding of inadequate,, OFSTED will take action in accordance with its Compliance Handbook, such as issuing a notice to improve, if it considers that standards are not being met, and has the ultimate sanction of suspending or cancelling a provider's registration – either of those decisions, but not decisions to take lesser, non-statutory action, may be appealed to the First-tier Tribunal.

Complaints process

22. None of the appeal provisions referred to above are directly against OFSTED's judgment as to the grade to be awarded to any institution. Any complaint about the judgments reached must be taken up with OFSTED through its complaints process, which has four stages.

23. Step 1 is to raise any concerns with the lead inspector during the inspection visit and to ask to speak to a manager if the issue cannot be resolved directly. There is an opportunity to comment on the factual accuracy of any report before it is finalised and published.

24. Step 2 requires a formal complaint to be submitted, online, within 10 working days following the incident of concern. An investigating officer will then be appointed, and will normally provide a written response to the complaint within 30 working days. OFSTED will not normally withhold publication of the inspection report during an investigation, unless it considers that there are exceptional circumstances, and a judgment that a school has serious weaknesses or requires special measures will not be considered at this stage.

25. Stage 3, if a provider is not happy with the outcome of the formal complaints procedures (perhaps inevitable if the complaint is against a finding that special measures or significant improvement is required), is an internal review of the handling of the complaint so far,

which must be requested within 15 working days of the response to the original complaint. Any request for a review of a judgment that a school has serious weaknesses or requires special measures will apparently be carried out at this stage. The findings of the review will be considered by a scrutiny panel including an external sector representative before being finalised, and the response will normally be provided within 30 working days of the request for internal review.

26. Stage 4, finally, is an external review process, currently carried out by the Independent Complaints Adjudication Service for Ofsted. It must be requested within 3 months of the internal review response letter and will involve an investigation of how the complain was dealt with in order to provide advice about OFSTED's complaints handling process. It cannot overturn inspection judgments or decisions.

27. It is therefore perhaps not entirely surprising that providers who feel the judgments in their cases are not warranted have turned to the Courts, as set out below.

Judicial review of OFSTED's judgments

28. OFSTED is a public body for the purpose of judicial review, and its reports are susceptible to the usual public law challenges any other public decision is susceptible to: irrationality, procedural fairness and illegality.

29. Following a freedom of information request, on 7 November 2017 OFSTED released details of judicial review challenges it had received since 2007. The table provided is not particularly clear, but there are 22 challenges, the majority of which settled or were withdrawn. 1 of those is ongoing. Not including those for which the basis of settlement or withdrawal is unclear, there are 5 where the school benefited in some tangible way by the JR.

30. In 2017 there have been two high profile reported judgments involving OFSTED reports. In this paper we summarise the bases of public law challenge to an OFSTED judgment or report.

Illegality

31. The clearest example of this is where OFSTED act outside its statutory powers. This was the case in **Old Co-operative Day Nursery v HM Chief Inspector, Children's Services and Skills [2016] EWHC 1126**. The Claimant nursery was inspected following a complaint from a member of the public that a child had stepped into the road in front of her car, and there had been inadequate supervision by the Claimant's staff.

32. Section 50(1) of the Childcare Act 2006 (which remains the law) sets out that the Inspector should report on:

> "(a) the contribution of the early years provision to the well-being of the children for whom it is provided,
>
> (b) the quality and standards of the early years provision,

(c) how far the early years provision meets the needs of the range of children for whom it is provided, and

(d) the quality of leadership and management in connection with the early years provision."

33. OFSTED further produced a guidance document dated August 2012 (which is still available online) which stated in respect of individual complaints:

> "We are not a complaints adjudicator. We have no legislative duty or power to investigate complaints against providers to determine whether complaints are upheld, partially upheld or substantiated. Our role is to establish whether a registered person is meeting the *Statutory Framework for the Early Years Foundation Stage…*"

34. OFSTED had published an Outcome Summary of the inspection on its website. It dealt solely with the complaint - particularly the fact the Claimant had compromised the child's safety and not adequately investigated the incident. It was, in essence, a report of the complaint. As a result, the Court found the publication of this Outcome Summary was unlawful as OFSTED were not entitled to undertake an individual investigation or adjudication into an individual complaint.

35. The issue of illegality will also arise where OFSTED makes a "legal" finding such as that a policy breaches the Equality Act 2010. This was the issue in the high-profile case of **Chief Executive of Education, Children's Services and Skills v Interim Executive Board of Al-Hijrah School [2017] EWCA Civ 1426**. The school was a mixed sex voluntary aided Islamic faith school. From Year 5, the school operated a gender segregation policy. This was for religious reasons, and many parents chose the school because of it.

36. OFSTED had graded the school as inadequate in three respects. That grade had been based on (1) discovery of books in the library that were derogatory and inciting violence towards women, (2) the failure to have due regard to the public sector equality duty, and (3) ineffective arrangements for safeguarding. It argued, particularly in light of the Equality Act 2010, that the segregation policy constituted less favourable treatment for girl pupils who could not learn and socialise with boys and vice versa for boy pupils; and that there was particular detriment to girl pupils as they had the minority of power in society and amounted to an expressive harm by implying girls were inferior to boys.

37. It is notable OFSTED never argued that there was a difference in the quality of the education between boys and girls – its position was simply that they suffered educationally from the restriction on social interaction. At first instance, this had led Jay J to find there was no qualitative distinction between male and female interaction and therefore found there was no discrimination.

38. The Court of Appeal held:

    a. The correct approach is to look at a girl pupil who wishes to mix with a boy pupil is precluded from doing so because of her sex. The vice versa is also correct. There was direct discrimination (paragraphs 44-47).

b. Less favourable treatment must be viewed from an individual perspective and not a group perspective. Each girl and boy pupil cannot socialise with the opposite sex, and therefore is treated less favourably because of their sex. The inspectors had received negative comments from two year 10 girls as to the segregation policy (paragraphs 14-15, 49-55).

c. It was not accepted that separate but equal treatment in respect of gender cannot be unlawful discrimination (paragraph 56-77).

39. The Association of Muslim Schools, of which Al-Hijrah was a member, applied to be added as a party and seek permission to appeal to the Supreme Court. Al-Hijrah had worked to implement the decision, however ten other members of the Association operated the same policy. The Court of Appeal refused the application (see **[2017] EWCA Civ 1787**) for various reasons, among the fact that the Association had known about the proceedings but decided not to be joined. Notably, the Court of Appeal also set out that the judgment related to the precise arrangements for segregation at Al-Hijrah at the time of the OFSTED report – it did not, for example, relate to the separation of girls and boys for certain activities.

40. The wider implications of the judgment have been widely discussed, and particularly how those will impact on single sex schools. There is an exemption for such schools in the Equality Act so legally it will not affect them. But it is interesting that in the Court of Appeal OFSTED did not argue the quality of the girls and boys education was different at Al-Hijrah, only that "they all suffer educationally from the restriction on social interaction". This would apply equally to single sex schools. The new Head of OFSTED, Amanda Spielman, has however argued recently that single sex schools ensure pupils are well prepared for modern life and when questioned cited the evidenced benefits of single sex education.

Procedural fairness

41. In **R (Durand Academy Trusts) v Office for Standards in Education, Children's Services and Skills [2017] EWHC 2097 (Admin)**, Durand had been judged "inadequate" and it was recommended it be put in special measures. In 2008 it had been "outstanding" but had expanded in terms of size and added a boarding element. A 2013 inspection found the school "good", but in 2016 found it was "inadequate".

42. The focus of this case was on OFSTED's complaints mechanism. That provides for three steps. Step 1 was an informal resolution of complaints, Step 2 was a formal procedure and Step 3 was a means of reviewing complaints handling. Crucially, if the inspection judged a school to "have serious weaknesses or to require special measures, these judgments will not be reconsidered under step two of this policy", and then the handling of Step 1 can only be reviewed in Step 3. In short, there is no formal complaints procedure for the most serious and negative findings by OFSTED.

43. OFSTED justified this because (1) there are extended quality assurance procedures prior to authorisation of the judgment by the Chief Inspector, (2) the school contributes to the

process by commenting on a draft final report, (3) there is a public interest in schools judged to have serious weaknesses not being able to delay publication of the outcome.

44. The Court rejected these justifications. In particular it rejected a justification for limiting an appeals process because a decision maker's processes are so effective they will in effect be unimpeachable – particularly in light of **Old Co-operative Day Nursery** which is an example of an irrational conclusion. The lack of complaints mechanism was sufficient to quash the report.

45. OFSTED have applied for permission to appeal, and instructed James Eadie QC, First Treasury Counsel. On the ground, the boarding provision at Durand (which caused most concern to the Inspector), has since been closed.

46. In the interim the OFSTED complaints policy remains in place. Therefore any school who has recently been judged as "inadequate" would appear to have strong grounds for judicial review on the complaints policy alone. Furthermore, maintained schools that are graded "inadequate" will receive an academy order issued pursuant to section 4 of the Academies Act 2010. Such an order would also be vulnerable to challenge.

47. As to other aspects of procedural fairness, it is noted that the Court has generally given short shrift to arguments on the manner in which an inspection was carried out. In **Old Co-operative Day Nursery**, Coulson J found:

> "61 In addition, complaints were made in Mr de Mello's skeleton that Ms Gray was demeaning to staff and to the Deputy Manager after Ms Harris had been taken away by ambulance; that she behaved autocratically and unreasonably; and that she failed to put her concerns to Ms Harris before reaching conclusions. None of these allegations was supported by the evidence. Even if they had been, I consider that they go nowhere: it will very often be the case that teachers at a school being inspected will regard the inspectors in a less than favourable light. But the issue is whether the inspector's conduct led to any particular unfairness, and none has been established on the evidence."

Irrationality

48. A Defendant in any judicial review will almost without exception remind the Court that to show a decision was "Wednesbury unreasonable" is a very high bar. They will perhaps trot out the familiar phrase "*so* unreasonable that no reasonable person acting reasonable could have made it". In the context of OFSTED reports that high bar does seem to apply, though the door does appear (increasingly) open ajar for such arguments to be made.

49. The limited scope of a rationality challenge is demonstrated by **Cambridge Associates in Management v OSFTED [2013] EWHC 1157**. Ofsted had inspected following a complaint about an incident where for a period of about five minutes, 8 pre-school children were left with a single member of staff. A child became upset and due to the staff member's attention on them, the other children were unsupervised and a commotion ensured. OFSTED had found the children were inadequately supervised and given a 'Notice to Improve' (a non-

statutory notice with no criminal consequence for non-compliance). The Claimant argued the notice was irrational. The Judge dismissed this argument fairly readily:

> "42 In my judgment, Ofsted was entitled to conclude that the period, albeit short, was nonetheless significant, rather than minimal, and that the incident indicated a lack of effective staff deployment on this occasion. It takes a much shorter period than 5 minutes for a young child to suffer a major accident. The children were left vulnerable.
>
> 43 Having lawfully found that there was a failure to comply with the welfare requirements, Ofsted then had to decide whether to do nothing, or to take one of the actions specified in its escalating tariff of non-statutory and statutory action. In my judgment, the decision to issue a Notice to Improve was a proportionate and reasonable one in all the circumstances.
>
> 44 It was based on the recommendation of an experienced Inspector. In her judgment, concurred in by others within Ofsted, the incident warranted such action, in particular because it presented a risk to child safety and left children vulnerable." (emphasis added)

50. The Court may be more willing to hear argument that the Inspector has failed to take into account relevant considerations, or taken into account irrelevant considerations. An example of this, and particularly important where there is a sudden change in grading, is the **Old Co-operative Day Nursery** case.

51. The Defendant had guidance 'Conducting early years inspections' which set out that "The inspector must ensure that they take account of the history of the provision in making their judgments…". This guidance has been replaced with the 'Early Years Handbook' but this still requires Inspectors to check previous inspection reports. The importance of checking previous reports was emphasised by the judge, to ensure the process did not turn into a lottery with the individual inspector having arbitrary power and influence.

52. The Claimant had been graded Outstanding in in September 2013, then rated Inadequate following the inspection on 6 May 2014 (following the complaint about the child in the road) and then rated Outstanding again following a further inspection on 6 August 2014. Some statistics had been provided on how rare this is, and in short, the judge found it was very rare. Upon considering the Inspector's notes from the inspection on 6 May 2014, the judge found that whilst the Inspector had looked at previous actions/recommendations, there was no evidence of her looking at the entirety of the reports. The judge therefore found the Inspector had failed to take into account the history of reports and had therefore behaved irrationally.

53. In **Durand**, the OFSTED report was challenged on rationality, but because of the unlawful complaints procedure the Court did not need to deal with it. However, the Judge did make a comment:

> "52 That said, I do have significant concerns as to whether, on a fair analysis of the evidence base in general and the Final Summary Evaluation in particular, the material does really lead to a conclusion that the School was inadequate and in need of being placed into special measures rather than the lesser category of requires improvement. Perhaps, as counsel for the School sought to persuade me, the undoubted weaknesses in the boarding school in Midhurst have

permeated the whole assessment. However, in the light of my conclusions on the first ground there is no need for me to, and I do not, express a concluded view on the rationality of the Report."

54. This appears to suggest the Judge was willing to look at the merits of the conclusions by OFSTED. This can be contrasted with the strict approach in **R (Mary George Ltd) v Care Quality Commission [2013] EWHC 1341 (Admin)**, where the claim was deemed unarguable as nothing more than disputes with the findings by the CQC. In **Durand** the question was not on findings, but the conclusions reached on the basis of findings. Was the Court willing to look at the overall conclusion even though it was a matter of professional judgment?

Damages

55. There is no general right to damages in public law, and a damages claim can only be brought where there is a concurrent right in private law. For example, it may be alleged there has been misfeasance in public office, however this will rarely even be arguable on the facts.

56. In **Old Co-operative Day Nursery** the Claimant had sought damages under the Human Rights Act 1998. A company can be a victim for the purposes of the Human Rights Act 1998 (see e.g. **Times Newspapers Ltd v UK, Application 6538/74** in respect of article 10, or **Air Canada v UK (1995) 20 EHRR 50**). However, there is no case which establishes a right of damage in consequence of damage to reputation under article 8.

57. In any event, a claim in damages will generally be very difficult to sustain. The concerns in Old Co-operative Day Nursery will be common to most claims:

    a. There was no evidence of damage;

    b. There can be no expectation of damages arising from an OFSTED report – section 151 of the Education and Inspections Act 2006 provides that such reports are privileged (albeit for the purposes of defamation).

    c. For article 8 to come into play attack must meet a minimum level of seriousness (**Axel Springer AG v Germany [2012] EMLR 15**). This had not been met.

58. Therefore it is doubted that damages will be a realistic course of action even if an OFSTED report has found to be unlawful.

Injunctions to restrain publication

59. As set out above, OFSTED's invariable policy, even where it is not a strict statutory duty, is to publish inspection reports, including on its website. The Courts have repeatedly recognised the strong public interest in publication of the findings of the statutory body tasked with investigating standards in schools (and other education providers). It is however possible, in limited circumstances, to obtain an injunction to restrain publication.

60. For many years, OFSTED routinely responded to any threat of an injunction application by relying on the case of **R (City College Birmingham) v OFSTED** [2009] EWHC 2373 (Admin), a

judgment of Burton J. in which at the pre-permission stage he proceeded on the basis that the claim was arguable but held that there were not sufficient "exceptional circumstances" or the "most compelling reasons" which would be required to grant an injunction.

61. More recently, however, whilst applying the same legal test, the Courts have shown an increased willingness to grant injunctions. In the **Cambridge Associates** case in 2013 (see above), an injunction was granted pre-permission and continued following permission, although the claim ultimately failed. More recently, in both the **Al-Hijrah** and **Durand** cases, injunctions were granted and maintained up to the determination of the judicial review application.

62. In the **Al-Hijrah** case, then known as **Interim Executive Board of X v OFSTED**, Stuart-Smith J. gave a full judgment ([2016] EWHC 2004 (Admin)) on the opposed application for an injunction at the pre-permission stage. Having concluded that the material he had seen suggested that the unpublished report was "*infected by a pre-determined mindset or bias*", and that there was compelling evidence that publication of the report would cause irreparable damage at a sensitive stage in the school's history, he determined that the school had established a pressing ground for an injunction and that there were exceptional circumstances.

63. It is evident from the judgment of Stuart Smith J. that, whilst formally only an arguable case is required for the issue of interim relief to be viable, the apparent strength of the underlying case will unavoidably be a powerful factor weighing for (or against) the grant of an injunction. The test remains whether there are "exceptional circumstances", and these will need to be demonstrated by clear and compelling evidence of the consequences likely to arise from publication. Those consequences will of course vary depending on the type of provision in question: a state-funded school may be less likely to be able to show irreparable damage to its ongoing viability, for example, than a private sector early years provider whose customers can remove their children more or less at will. In **Al-Hijrah**, community relations were an important factor. Ultimately each case will depend on its own facts, but it cannot be emphasised enough that time spent on the preparation of evidence prior to applying for an injunction will always be time well spent.

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