UK COVID-19 INQUIRY

FINAL WITNESS STATEMENT OF VANESSA WARD, CEO-CI OF THE INDEPENDENT SCHOOLS INSPECTORATE

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1. Thank you for inviting me, Vanessa Ward, Chief Executive-Chief Inspector of ISI, to provide written evidence on behalf of ISI to module 8 of the public inquiry into Covid-19.

2. I joined ISI in February 2021, midway through the specified period. Prior to my arrival at ISI, the Executive had been operating under interim leadership arrangements. The information provided from before I joined the organisation is based on internal documentation and records held on file. This witness statement is made to the best of my knowledge and belief which is limited with regard to the specified period because of the start date of my employment by ISI.

<u>About ISI</u>

3. The Department for Education (DfE) is the regulator for all independent schools in England. ISI is an independent inspectorate appointed by the DfE and is not itself the regulator (as referred to in the invitation to provide written evidence).

4. ISI inspects association independent schools in England on behalf of the regulator, the DfE.

5. The focus of this response is on what we have learnt about the specified period through the information that we gather on statutory inspection in order to report to the

DfE, as regulator, on the extent to which schools are meeting the statutory Independent School Standards and other relevant standards (collectively, 'the Standards'). The 'other relevant standards' referred to above are:

- the Early Years Foundation Stage statutory framework.
- the National Minimum Standards for boarding schools.
- any other standards that may from time to time be applicable to the schools inspected by ISI.

6. ISI's inspection of association independent schools is funded by an annual charge levied on association independent schools. This is calculated on a per school and per pupil basis based on the direct cost of inspection. Aspects specific to each school, such as early years and boarding provision, are charged separately alongside the annual charge. ISI does not receive any public funding.

7. Key points:
- The Department for Education (DfE) is the regulator for all independent schools in England.
- ISI is an independent inspectorate appointed by the regulator.
- ISI's inspections inform the DfE on the extent to which the Standards are met in association independent schools.
- ISI does not have powers to ask for information or collect data from schools other than as part of a statutory inspection commissioned by the DfE, as regulator, to report on the extent to which Standards are met.

ISI's approval to inspect

8. ISI is an independent inspectorate formally approved by the Secretary of State for Education to inspect independent schools in England that are members of associations affiliated to the Independent Schools Council:

- The Association of Governing Bodies of Independent Schools
- The Girls' School Association

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- The Heads' Conference
- The Independent Association of Prep Schools
- The Independent Schools Association
- The Independent Schools' Bursars Association
- The Society of Heads.

9. The Independent Schools Council's annual censuses for the specified period show that in 2020 there were 537,325 pupils at 1,374 association schools; in 2021 there were 532,237 pupils in 1337 association schools; and in 2022 there were 544,316 pupils in 1388 association schools.

10. The Secretary of State's power to approve inspectorates is regulated by statute and delegated legislation. The key provisions are in the Education and Skills Act 2008 (section 106).

11. The Secretary of State has a parallel power in relation to the inspection of boarding care in schools in the Children Act 1989 (section 87A).

12. Ofsted inspects independent schools in England that are not members of associations affiliated to the Independent Schools Council.

13. Advice from the DfE sets out detailed expectations of inspectorates which must be met for continued approval. Guidance from the DfE sets out detailed expectations of inspectorates which must be met for continued approval to inspect, VW/01 - INQ000618418.

14. The Secretary of State's approval of ISI is set out in a formal letter and agreement. ISI's reappointment letter as an approved inspectorate, VW/02 - INQ000618423.

15. Our inspection reports inform the DfE on the extent to which the statutory Independent School Standards are met.

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16. ISI is also approved by the DfE to inspect British schools overseas, and by the Home Office to undertake education oversight inspections of private further education colleges and language schools.

17. ISI is, in addition, appointed to develop and undertake inspections for courses leading to international qualified teacher status.

ISI's Governance and Policies

18. ISI is accountable to the DfE the regulator for independent schools in England.

19. ISI has an independent Board of Directors, who are appointed because of their experience and skills. The Board holds the leadership team to account for the delivery and quality of inspections.

20. The Board and Executive are fully independent from the Independent Schools Council, their associations and the schools that ISI inspects.

21. The Board adheres to the Nolan Principles of Public Life and ISI's own Code of Conduct.

22. The detailed scrutiny of certain areas of the Board's responsibilities is delegated to three Committees. These are the Finance and Infrastructure Committee, the Assurance Committee and the Governance, Nominations and Remuneration Committee.

ISI inspection frameworks

23. Inspections of association independent schools during the period 1 January 2020 to 28 June 2022 took place under ISI's previous inspection framework. Typically, over a six-year cycle, every school has two scheduled routine inspections.

24. Under ISI's previous framework, one of these routine inspections was a regulatory compliance inspection which reported on the extent to which the school met all of the Standards. The other routine inspection was an educational quality and focused

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compliance inspection which considered whether schools were meeting elements of the Standards together with the quality of pupils' academic and other achievements and the quality of pupils' personal development.
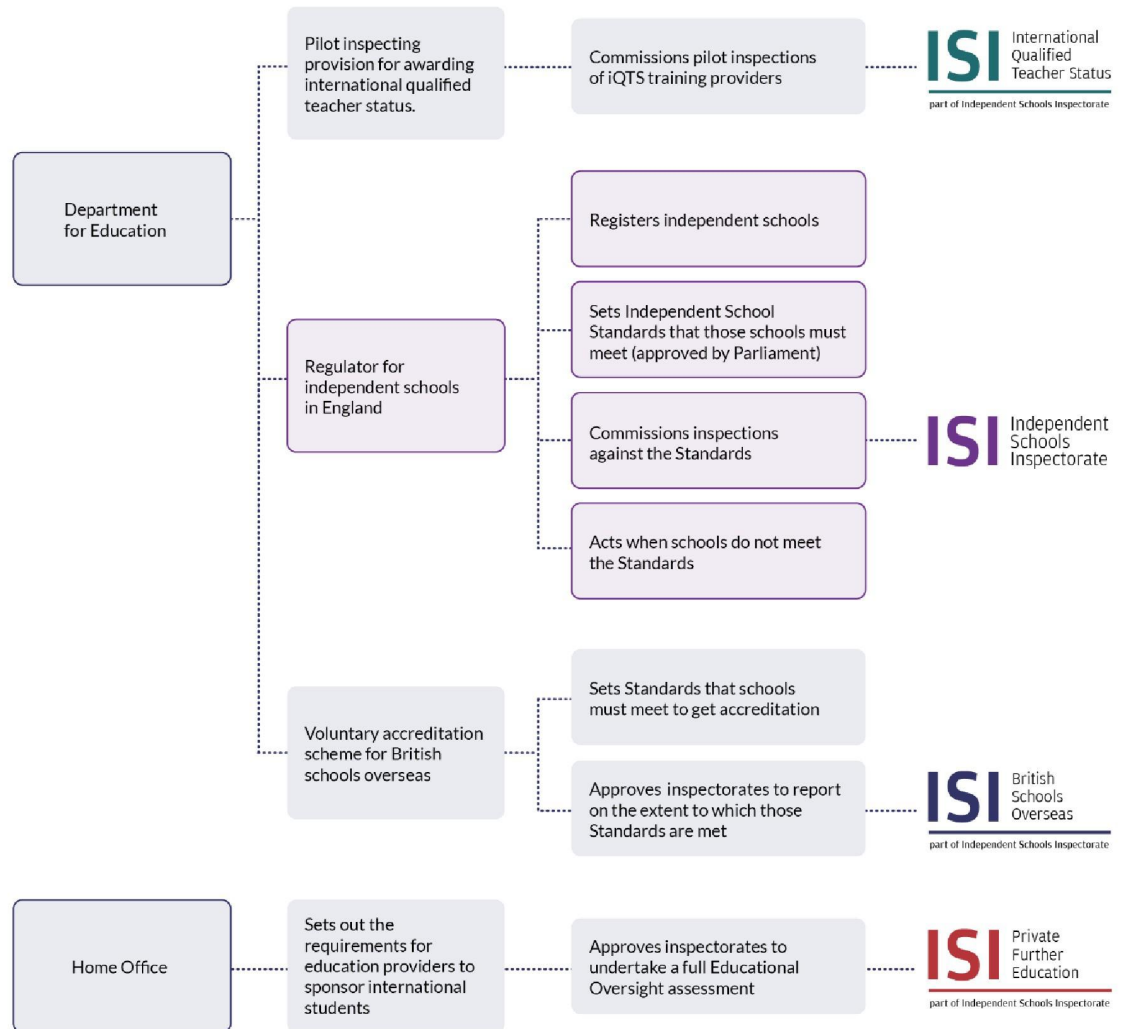
25. The six-year cycle under the previous framework was extended by one year to July 2023 because of the suspension of inspections during the pandemic.

26. Routine inspections under ISI's current inspection framework started in September 2023. They focus on evaluating all aspects of provision relevant to the Standards through the lens of pupils' wellbeing.

27. ISI's inspection reports are structured thematically, using the definition of pupils' wellbeing contained in the Standards

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28. Each year, ISI publishes an annual report on its inspection activity, the most recent covering 2023-24, VW/03 - INQ000618424. Since the academic year 2023-24 this has included thematic insights which detail both where provision is working well, and what could improve.

ISI's responsibilities during the specified period

29. The responsibilities in relation to the inspection of association schools, British Schools overseas and Private Further Education colleges did not change. However, in response to the context of the pandemic, the methodology for inspections did change, as explained below.

30. Routine inspections were suspended between March 2020 and September 2021. Some inspections commissioned by the DfE took place during this period, with a combination of remote review and on-site inspection, determined by the government regulations in force at the time.

31. ISI went through a period of significant leadership reorganisation during the period. An interim executive board assumed leadership responsibility during 2020 until the appointment of a combined CEO-Chief Inspector role in February 2021.

ISI's engagement with Government and other stakeholders

32. ISI works with the DfE and the Home Office as set out in the table below:

Department for Education	Pilot inspecting provision for awarding international qualified teacher status.	Commissions pilot inspections of iQTS training providers	ISI International Qualified Teacher Status — part of Independent Schools Inspectorate
	Regulator for independent schools in England	Registers independent schools	ISI Independent Schools Inspectorate
		Sets Independent School Standards that those schools must meet (approved by Parliament)	
		Commissions inspections against the Standards	
		Acts when schools do not meet the Standards	
	Voluntary accreditation scheme for British schools overseas	Sets Standards that schools must meet to get accreditation	ISI British Schools Overseas — part of Independent Schools Inspectorate
		Approves inspectorates to report on the extent to which those Standards are met	
Home Office	Sets out the requirements for education providers to sponsor international students	Approves inspectorates to undertake a full Educational Oversight assessment	ISI Private Further Education — part of Independent Schools Inspectorate

33. ISI meets, and is in regular contact with, officials from government departments to report on inspections and discuss relevant matters.

34. ISI has developed strong relationships with local safeguarding partners and professionals, including designated officers (e.g. LADOs or DOFAs). ISI engages

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with safeguarding partners at a national level through the National LADO Network and The National Policing Vulnerability Coordination Centre.

35. Lead inspectors contact the relevant local authority safeguarding officer prior to an on-site inspection. ISI may contact a LADO/DOFA to help evaluate a school's safeguarding arrangements on inspection and/or to alert them to concerns received about a child and/or staff member.

36. Under ministerial direction, ISI and Ofsted also have a joint working arrangement based around the exchange of knowledge and understanding, with a view to informing best practice in each organisation. This includes the mutual shadowing of inspections and delivery of joint inspector training. Safeguarding is one of a number of areas in which ISI works collaboratively with Ofsted. We have also co-presented with Ofsted at regional safeguarding forums.

37. This joint working arrangement results in an annual report by Ofsted to the Secretary of State for Education. Ofsted's 2023-24 Annual Report letter, VW/04 - INQ000618425.

38. ISI is wholly independent of the schools it inspects and their associations. It maintains professional dialogue regarding the methodology of inspection with school associations and receives feedback from associations through a termly formal meeting. Officials from ISI and the DfE attend the monthly Independent Schools Council executive meeting for a short agenda item relating to regulation and inspection.

Summary of schools inspected by ISI

39. ISI inspects 1,314 association schools in England, of which 589 are junior age range (including early years providers), 242 are senior age range and 483 are all-age range. Please see the Independent Schools Council annual census for more information on the nature of the schools inspected by ISI which is available on the Independent Schools Council website.

40. Under the current inspection framework, there is one type of routine inspection. Typically, each school is inspected routinely once every three years. The resulting inspection report follows the structure of the ISI Inspection Framework.

41. There are three types of non-routine inspections, commissioned by the DfE:

- **Material Change**: This occurs when a school applies to change the terms of its registration with the DfE, for example by extending its age range.
- **Progress Monitoring**: This occurs when a school has failed to meet the standards on a routine inspection and is visited to inspect for improvement.
- **Additional**: This occurs when the DfE has reason for a school to be inspected urgently.

42. ISI has inspected 77 BSO schools over the previous three years. ISI inspects 40 PFE colleges, most of which are inspected every year.

Structures activated in response to the pandemic

43. ISI set up and/or developed the following structures during the specified period:
- A remote inspection protocol for when it was necessary that an inspection take place, but it was not possible for the inspection team to conduct an on-site visit. Additional information was provided through:
  o Guidance for schools on inspections during Covid-19 2021-09, VW/05 – INQ000618426.
  o Guidance on evaluating remote education 2021-04, VW/06 - INQ000618427.
  o Guidance for remote reviews, VW/07 - INQ000618428.
  o ISI Covid deferral protocol, VW/08 - INQ000618429.

- Additional risk assessment procedures relating to risks associated with Covid-19 infection, VW/05 - INQ000618426.

ISI pandemic planning

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44. Prior to January 2020, ISI's responsibility to inspect schools as appointed by the DfE, did not, to the best of my knowledge, include planning materials covering a pandemic situation.

45. ISI has (and did have) a protocol in place for the deferral of inspections in certain circumstances. Any request for deferral from a school following notification of inspection is referred to the DfE for consideration.

46. From early 2020, ISI did anticipate that schools might request deferral of inspection for COVID-19-related reasons. In this event, ISI followed Standard inspection deferral procedures.

47. From mid to late February 2020, ISI planned for meeting its responsibility to the DfE, as regulator, by considering the possible rescheduling of inspections in response to school closure.

48. From April 2020 planning took place in relation to the impact of Covid-19 on:

    - ISI's workforce (employed and contracted)
    - ISI's Inspection activity and operations
    - Schools inspected by ISI
    - ISI's finances

49. The ISI office was closed on 18th March 2020 and a business continuity plan for remote working was implemented; staff worked from home from this date. Absences were recorded and a list of vulnerable and high-risk employees was held. Flexibility regarding working hours was offered and mental health networks were signposted to staff.

50. Managers were encouraged to hold daily team catch up meetings and most meetings were transferred to video conferencing. The HR team updated staff emergency contact details and arranged for a mental health training session to take place remotely.

51. A home working policy was prepared and provided staff with greater clarity.

52. Furloughing of any non-essential staff was reviewed.

Communication with Government and schools between January and March 2020

53. In late February 2020, ISI advised schools on its website that the DfE had published guidance to assist schools and other educational settings in providing advice for pupils, students, staff and parents or carers.

54. ISI advised that the guidance was being updated regularly, and schools and colleges were advised to ensure they stayed up to date with it.

55. There was ongoing communication between ISI and the DfE during February and March 2020 about COVID-19, potential school closures and inspection deferral.

56. In February 2020 it was anticipated that there might be a deferral of inspections on a small scale in schools with recorded outbreaks. ISI's advice to schools from 2 March was that whilst a school remained open, ISI would continue to inspect as normal.

57. ISI made contingency plans for the rescheduling of inspections as necessary. By 9 March 2020 ISI started to plan for large-scale inspection suspension.

58. In mid-March 2020 the DfE moved inspections from deferred to suspended, with the suspension period starting on 16 March 2020. This was confirmed in a letter from the DfE Independent Education Division Director, Dr Peter Swift, on 20 May 2020, VW/09 - INQ000618430.

59. At this point, while ISI still aimed to deliver both routine inspections for all schools within the planned six-year inspection cycle (2016-2022), contingency planning for an extension of the cycle was being considered.

60. Regular contact was maintained with the DfE and Ofsted to agree any emergency inspections focusing on children who were at risk.

61. ISI released guidance for remote teaching focusing on safeguarding. ISI also participated in discussions with the DfE safeguarding unit.

<u>Trends observed in the three years preceding the specific period relating to the education of children and young people</u>

62. Data relating to Standards met and not met relevant to these aspects of provision from the inspections carried out over the three years prior to the specified period show that:

- The percentage of schools that met the Standards varied slightly between 86% and 88%.
- 99% of schools met Parts 1 and 2 of the Standards (on curriculum and teaching - this includes educational attainment and progress for all children, including those who have SEND, as well as effective preparation of pupils for the opportunities, responsibilities and experiences of life in British society).
- Between 86% and 89% of schools met the Standards in Part 3 (welfare, health and safety of pupils – this includes safeguarding and behaviour). Part 3 contains Standards promoting good behaviour amongst pupils; sets out the sanctions to be adopted in the event of pupil misbehaviour; and requires that a record is kept of the sanctions imposed upon pupils for serious misbehaviour.
- Between 92% and 95% of schools met the Standards in Part 4 (recruitment checks).
- Lack of attendance at school was not a pre-existing issue in association independent schools. (The Standards require that the proprietor maintains an admission and attendance register).

63. Prior to the specified period, remote education was not a significant feature of how education was being provided in schools inspected by ISI. Some schools, for example as part of a group of schools, had begun to develop their remote teaching capacity.

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How and when ISI's work as an inspectorate changed during the pandemic

64. Please note that ISI is not the regulator of independent schools.

65. In March 2020 inspections were suspended by the DfE due to the pandemic. 43 inspections scheduled for the spring term and 128 inspections scheduled for the summer term were suspended.

66. Prior to suspension, ISI had carried out (under its previous inspection framework) 59 regulatory compliance inspections (RCIs), 70 educational quality inspections (EQIs), eight material change inspections (MCIs), 21 progress monitoring inspections (PMIs) and 11 additional inspections (AIs) since 1 January 2020.

67. ISI carried out one material change inspection commissioned by DfE during the Summer of 2020.

68. ISI moved to risk-assessed remote review inspections from September 2020 for progress monitoring inspections of schools that had been found not to meet the Standards on a previous inspection and for material change inspections.

69. During this time, the suspension of inspections created an opportunity for ISI to reflect on the experience of school for pupils, and groups of pupils, particularly those who may have particular vulnerabilities.

70. As a result of this reflection, ISI developed a nuanced model of understanding the range of pupils' experiences, focusing on how a school's culture may be experienced differently by pupils in the same school. The resulting 'three levels of school culture' model has been incorporated into ISI's current inspection framework alongside a revised methodology for speaking to pupils on inspection, based on principles of professional noticing.

The deployment of ISI's workforce during the pandemic

71. During this time ISI had a wholly contracted lead inspector workforce. Since then, ISI has developed a small, employed team of inspectors who provide capacity to be deployed at short notice.

72. During the specified period, contracted inspectors were stood down from suspended inspections. Team inspectors, for the most part, work in schools so their working arrangements were determined by their place of employment.

73. During the pandemic, remote working was implemented across ISI for all employees. Thirteen ISI staff were furloughed, representing 40% of the total employed workforce.

Inspecting during the pandemic

74. Inspections that took place during this time were commissioned by the DfE and focused on the extent to which the school met specified Standards, including safeguarding. Inspections did not specifically focus on how schools were responding to the Covid-19 pandemic.

75. The DfE as regulator commissioned non-routine inspections based on its assessment of information received.

76. All inspections in the academic year 2020/2021 were commissioned by the DfE, who selected the schools for inspection.

77. Inspection activity in 2020/2021:

Inspection type	Autumn 2020	Spring 2021	Summer 2021	Total
Regulatory Compliance Inspection (routine)	0	0	20	20
Education Quality Inspection (routine)	0	0	14	14

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Additional inspection	24	9	8	41
Progress Monitoring Inspection	9	3	5	17
Material Change Inspection	5	1	13	19
Progress Monitoring Remote Review	8	4	1	13
Material Change Remote Review	28	9	23	60
TOTAL	**74**	**26**	**84**	**184**

78. The routine inspection schedule recommenced in September 2021.

79. Once inspections had resumed, ISI took a risk-based approach to the sequencing of inspections through the academic year 2021/2022. This involved sharing data with the DfE and agreeing the priority for scheduling inspections.

80. The inspections carried out in 2021/2022:

Inspection type	Autumn 2021	Spring 2022	Summer 2022	Total
Regulatory Compliance Inspection (routine)	57	45	39	141
Education Quality Inspection (routine)	93	116	72	281
Additional inspection	18	5	7	30
Progress Monitoring Inspection	6	6	18	30

Material Change Inspection	12	7	16	35
Progress Monitoring Remote Review	2	0	0	2
Material Change Remote Review	4	0	0	4
TOTAL	**192**	**179**	**152**	**523**

81. As a result of the large numbers of inspection deferrals in 2020 and 2021, the six-year inspection framework cycle (September 2016 to August 2022) was extended to August 2023.

Variation in schools' approach to closure and key workers

82. All schools were instructed to close, apart from for children of key workers and vulnerable children.

83. ISI issued the following advice to boarding schools in April 2020 in its regular update to schools:

> *Where boarding schools consider arranging for boarders aged under 16 (or under 18 years if disabled):*
>
> - *to remain in their <u>own school</u> during school holidays, 'private fostering' provisions are triggered after two weeks (rather than 28 days). Schools must inform the local authority (LA) where the child is usually resident of the proposal at least two weeks before the arrangement is due to begin; where the relevant pupils are from outside the UK, schools are advised to notify the local authority where the school is situated; or*
>
> - *to be accommodated in a home-stay, the usual 'private fostering' guidance applies: see KCSIE paragraphs 192-194 for more information. Notifications to the*

LA must be made where the stay is to be for 28 days or more and can be made to either the LA where the child usually lives or where the school is.

84. ISI's main point of contact with schools is as part of the on-site inspection. The DfE, as regulator, held the relevant information regarding which schools remained open during this period.

85. To ISI's knowledge all schools inspected by ISI closed for the majority of pupils during this period.

Implementation of pandemic-related guidance in schools

86. Between 10 August 2020 and 22 November 2021 ISI was commissioned to remotely review schools. The remote reviews were commissioned by the DfE where schools had requested material changes or where schools had unmet Standards at the previous inspection. ISI conducted hybrid and on-site inspections of schools when they reopened for pupils.

87. Inspectors considered the school's arrangements in relation to relevant government COVID guidance for individual schools including how schools monitored pupils' attendance.

88. ISI did not report levels of attendance across the sector.

89. During the closure of schools for most pupils, the majority of schools reviewed by ISI provided remote education for pupils and had on-site provision in place for vulnerable children or children of key workers.

90. ISI Guidance for Schools on Inspection during Covid-19 September 2021 provides further information, VW/05 - INQ000618426.

91. ISI Guidance on Evaluating Remote Education from April 2021 is also relevant, VW/06 - INQ000618427.

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92. ISI also referenced DfE guidance in its regular updates to schools. This can be seen through the following documents:
   - Update to Schools, Spring 2020, VW/10 - INQ000618419.
   - Update to Schools, October 2020, VW/11 - INQINQ000618420.
   - Update to Schools, Spring 2021, VW/12 - INQ000618421.
   - Update to Schools, July 2021, VW/13 - INQ000618422.

93. During commissioned inspections (both remote and on-site) ISI monitored these schools' implementation of relevant guidance.

94. Where a school was found not to be following relevant guidance, the applicable standard was reported as not met. The DfE (and Home Office for schools with a UKVI Confirmation of Acceptance for Studies allocation) as regulators, would then decide on appropriate regulatory action.

Trends for specific groups of children observed during the pandemic period

95. Inspection evidence since the resumption of inspections has not indicated any significant trends in attendance levels across different groups of children in association schools inspected by ISI.

96. ISI has reviewed a sample of evidence for inspections that took place during this period. The sample of 25 inspections indicates that attendance rates in schools, when they reopened, were similar to those pre-COVID for all groups of pupils. However, the situation for boarders varied, there was a delay in boarders returning to some schools because of travel restrictions.

97. With regard to international students and boarders, further information is provided in the Guidance for Schools on Inspections during COVID-19, VW/05 - INQ000618426. The guidance sets out how boarding houses were to be assessed for compliance with the National Minimum Standards for Boarding, while also noting that schools may be able to provide evidence for how specific arrangements related to covid-19 may also have impacted on compliance. Inspectors requested to see the schools' risk assessment in relation to boarding.

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98. Other than as part of a statutory inspection, ISI was not commissioned to monitor or assess the approach schools took to students who either (i) were unable to return to their family homes, or (ii) could not or did not want to return to school after periods of being away. These matters were monitored on inspection in relation to the extent to which schools with international students met the National Minimum Standards for Boarding at the time of inspection.

99. On inspection, ISI considered the intersection of government requirements relating to Covid-19 and the requirements of the National Minimum Standards for Boarding.

100. ISI's review of inspection evidence indicates that some schools remained open for boarders from abroad who could not return to their family homes.

101. Some schools closed their boarding provision, where they catered for mainly UK-based families.

102. Schools with international boarders reported a delay in boarders returning to school because of travel restrictions but no other significant factors that affected pupils' return to school.

Reporting on schools' success and challenges

103. Details of how ISI monitored remote education are provided in Guidance on Evaluating Remote Education April 2021, VW/06 - INQ000618427. The guidance sought to support inspectors in evaluating the impact of remote education provision by providing questions to use with schools. It made clear that remote education was a tool for delivery of learning and that the underlying principles of effective teaching and learning were unchanged.

104. Given the impact of the pandemic on schools during spring and summer of 2020, it was directed by the DfE that no evaluation would be made of the nature or effectiveness of any provision during the specific period March to August 2020,

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including its impact on pupils' learning, achievement or personal development. This is included within the DfE suspension of inspections letter, VW/09 - INQ000618430.

105.   Analysis of the extent to which Standards were met by the schools during the academic years covered by the specified period (where inspections were carried out), shows consistency with pre-pandemic levels.

106.   Routine inspection activity of schools was suspended by the DfE between March 2020 and September 2021. ISI's inspection activities were suspended during most of the lockdown periods. Where online teaching was delivered it was therefore not possible to evaluate its implementation or effectiveness during the period it was in place.

107.   Routine inspections continued to be suspended until September 2021. In-person teaching had resumed in the most part by the time inspections were resumed. Where schools were still teaching remotely, the effectiveness of this was considered in relation to the requirements of the Standards for the quality of teaching.

108.   ISI's review of a sample of inspection evidence indicates that schools adapted to providing education remotely and continued to learn and build on their provision throughout the periods of school closure. They responded to feedback from parents and pupils to adapt their provision.

109.   For example, some schools initially offered work packs for pupils to complete but in response to parental concerns, they trained staff and adopted available online platforms to support pupils, such as Google Classroom and Purple Mash, Microsoft Teams and Zoom.

110.   Some pupils were offered on-site access to remote teaching if they could not access this at home.

111.   Most schools reviewed in the sample provided full-time education remotely and offered additional support where necessary.

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112. Schools typically provided a blend of live and recorded lessons for pupils as well as tasks which pupils completed independently or with the support of their families.

113. Schools adapted their curriculum, for instance, to reduce the length of lessons from one hour to 45 minutes to aid concentration and engagement for pupils.

114. Schools also adapted their curriculum to best facilitate online learning. They sequenced the curriculum plan for some subjects to reflect both challenges and opportunities of online learning.

115. For younger pupils in the early years, some schools provided online lessons for only part of the day complemented by hard copy work materials to be completed with support of those at home. This was because some young pupils found it challenging to maintain engagement with online lessons throughout the day.

116. Some schools reported advantages in online learning for particular groups of pupils, for example some pupils who have SEND were able to revisit recorded lessons which aided their understanding.

Reporting on schools' experience of assessing gaps in learning following lockdown

117. When ISI resumed scheduled inspections, an area of focus on inspection was whether and how schools had identified any learning loss in students and what and how effective their arrangements were to ensure that any learning loss was being made up.

118. Our sample of evidence shows that schools reassessed pupils on their return to school after each period of closure in order to provide support to make up any learning loss.

119. In many cases, no significant learning loss was identified. However, a number of schools were unable to teach sex education effectively during periods of lockdown and prioritised this for pupils on their return to school.

120. Many school leaders were concerned about the negative impact for pupils' social development, emotional wellbeing and mental health when they returned to school.

121. This consideration was included in the assessment of the extent to which schools were meeting Parts 1 and 2 of the Standards. Inspection outcomes show that the quality of education remained consistent across pre- and post-pandemic inspections.

122. Following resumption of inspection in September 2021, concerns relating to pupils' welfare during this period which directly relate to measures implemented by the school were considered on inspection. The provision of education for overseas boarders who did not return home was also considered.

ISI reporting on the impact of increased screen time as a result of online learning

123. Inspection activity considers this area as it is covered by the Standards and included in statutory guidance, including Keeping Children Safe in Education.

124. ISI's sample of evidence indicates that schools provided ongoing training and information for teachers, pupils and their families on risks associated with online learning, including safeguarding risks. For example, some schools provided additional training for pupils on the danger of online grooming.

125. Specifically, inspectors considered Part 3 of the Standards relating to Welfare, Health and Safety of pupils. Inspection outcomes show that the quality of provision to support pupils remained consistent across pre- and post-pandemic inspections.

Overall analysis of the impact of moving lessons online

126. ISI provides insight on inspection outcomes over each academic year by reporting to the regulator the extent to which Standards are met, and this information is provided by reference to each Part of the Standards. Inspection outcomes relating to the extent to which Standards are met with regard to Part 1 of the Standards (quality of education and curriculum) indicate that the quality of education remained consistent across pre- and post-pandemic inspections.

127.   School leaders expressed concerns to inspectors about the negative impact of pupils not attending school. School leaders noted increased anxiety and mental health issues as well as impaired development of social skills as a result of lockdown periods.

128.   Some school leaders noted that pupils found it more difficult to get along with their peers and this had an impact on their behaviour and wellbeing. For example, one school reported that some pupils found it difficult to maintain eye contact with others.

129.   Other observations by schools included that pupils' decision-making deteriorated and pupils were not always good at managing boundaries. Schools were focused on supporting pupils in these areas, as well as their academic progress.

130.   Schools reported that the wellbeing of pupils received greater focus in order to mitigate the impact of COVID.

Non-Pharmaceutical interventions in schools

131.   Inspectors considered the schools' use of NPIs in relation to the Standards concerned with the welfare, health and safety of pupils and the extent to which school leaders followed government guidance.

132.   The sample of evidence reviewed indicates that schools consistently observed government guidance to reduce the risk of spreading infection. Where inspectors found that this was not the case, the school was judged not to be meeting Standards.

133.   Our sample of evidence shows that schools managed the use of NPIs well but school leaders reported that the measures had an impact on some pupils' experience at school.

134. Some activities could not take place and others were restricted. For example, the development of pupils' leadership skills was impaired because engagement with other pupils was limited.

135. One school noted that behaviour incidents had reduced because of the restrictions on pupils mixing with each other and the close supervision of pupils.

136. There is no evidence to suggest that the use of NPIs has had a negative impact on academic outcomes.

<u>Support for teachers with centre-assessed grades</u>

137. Inspections were suspended from March 2020 to September 2021. During this period ISI was not commissioned to monitor or report on or otherwise assess schools' approach to training and supporting teachers to make their assessments for the purpose of teacher-assessed and centre-assessed grades.

138. Given the impact of the pandemic on schools during spring and summer of 2020, it was directed by the DfE that no evaluation would be made of the nature or effectiveness of any provision during the specific period March to August 2020, including its impact on pupils' learning, achievement or personal development. This is included within the DfE suspension of inspections letter, VW/09 - INQ000618430.

139. Similarly, ISI was not commissioned to monitor or report on or otherwise assess schools' approach to supporting and informing students about the process of assessment and grading during the Specified Period.

<u>Research into examination and grading during the pandemic</u>

140. ISI has limited capacity to identify or review external research into specific aspects of teaching and learning in association independent schools. The focus of our analysis is usually on ISI reports and evidence bases with a view to identifying themes and trends that can add value for the regulator, school leaders and education professionals.

141.   One example of external research that has been brought to our attention is by FFT Datalab comparing the experience or outcomes of examination and grading regimes during the pandemic in ISI-inspected independent schools to those of schools maintained by the state. The article was published on 16 August 2021 by Dave Thompson VW/14 INQ000652183

142.   The report sought to identify possible reasons for the increase in the attainment gap in GCSE grades between non-selective state-funded mainstream schools and selective independent schools.

143.   Within its report FFT Datalab noted that "there may be more to the increase in attainment at grade 7 and above in GCSEs at independent schools than just the corollary of independent school pupils tending to be found at the upper end of the attainment distribution. One theory is that pupils at independent schools suffered less disruption to their learning during the relevant two years."

144.   The report concludes by noting that more, and better, data is required to truly understand the root causes behind the growth in attainment during the pandemic period.

Reporting on safeguarding during the pandemic

145.   As soon as inspection restarted, ISI considered safeguarding in all remote reviews and on-site inspections. This continued to be reported on against the Independent School Standards. ISI considered the Standards in the context of the circumstances of the pandemic, including online learning.

146.   The data over the period shows that the percentage of schools not meeting Part 3 of the Standards (which includes safeguarding) was 13% in 2021-22, 11% in 2022-23 and 10% in 2023-24. This compares to between 11% and 14% in the three years prior to the pandemic.

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147.   Overall, this indicates that schools' experience of safeguarding children in relation to meeting statutory requirements was not significantly impacted during the pandemic.

148.   Through inspection, the extent to which schools met the Standards, including those relating to safeguarding, was monitored, including in relation to online teaching and communications. Depending on circumstances, inspectors considered matters such as:

- *Who is responsible for overseeing and assessing the additional safeguarding risks created by moving teaching online? (DSL? Other staff?) Are they sufficiently competent?*
- *Has the school's approach to online safeguarding been differentiated for the needs of different age groups or needs (if necessary)?*
- *Is policy clear on whether the school need staff to use their own equipment (such as laptops) or are these provided by the school?*
- *Have appropriate security requirements been set for all equipment?*
- *What approaches will the school take to clothing, backgrounds in video streams or recordings and behavioural expectations in online teaching/conferencing or presentations?*

149.   Inspectors also reviewed the schools' policies around safeguarding and considered their application in practice. Questions inspectors considered included:

- *Does the school have an Acceptable Use of IT and Social Media policy? Has it been updated as necessary?*
- *Risk assessment policy: have all new methods of teaching and communicating remotely been risk-assessed for safeguarding implications and appropriate mitigating steps taken?*
- *What arrangements are needed for reviewing that evaluation regularly?*
- *Behaviour policy, attendance policy, anti-bullying policy - do these need updating to reflect online learning?*
- *Does the safeguarding policy need updating to reflect any additional safeguarding risks in relation to greater use of online learning?*

- *Have the school and governing body considered their policies in the light of the possible inability to work of key people such as the DSL, head, safeguarding governor and/or chair of governors? Is there at least one person identified and designated to take over each role temporarily, if necessary, and have they each been suitably trained in safeguarding?*
- *How has/does the school check the understanding of staff and monitor compliance with new policy provisions?*

150.   Inspectors also considered whether new policies were needed due to the pandemic or whether changes were required within existing policies. This covered a broad range of topics from staff absence to online resources, communication with parents and specific arrangements for vulnerable pupils.

151.   Within any assessment of teaching and learning, inspectors assessed the presence of clear protocols for online learning, systems for monitoring the quality of teaching, and suitable privacy protocols for pupils.

152.   Additional consideration was given to:

- Monitoring internet use
- Sound and vision (use of cameras and microphones during lessons)
- Appropriate locations for learning
- Teacher training
- Device and facility security
- Recording of lesson content
- Behaviour
- Supervision
- Bullying
- Attendance
- Provision of information to staff, pupils and parents

153. ISI amended the record of evidence forms to reflect some of these additional questions and reflect particular concerns inherent in online teaching and communication.

Communication with Government during the specified period

154. ISI inspection reports are the main vehicle for communicating to the regulator the extent to which Standards are met, and related insights from the inspection process. ISI publishes inspection reports on its website. There is an advanced search feature which can filter by date or period of time. Reports published relating to inspection during the specified period can be found there.

Impact on learning and education of the pandemic

155. From ongoing reports, it is clear that the pandemic is likely to have impacted children in a wide variety of ways, both directly and indirectly.

156. However, the extent to which schools inspected by ISI meet required Standards has not shown significant variation pre- and post-pandemic.

157. Discussions with pupils on inspection and pupil surveys generally indicate positive attitudes to school and learning. However, it is well understood that pupils with vulnerabilities may find it more challenging to share their experiences with adults. It is therefore very important that sufficient focus is given to the children who may not articulate what needs to be heard.

Technology in the classroom

158. The ability to deliver lessons remotely will have improved with the experience from the pandemic, including the speed in which it can be set up.

159. The delivery of teaching in the schools inspected by ISI has largely returned to in-person teaching and remote education is not a feature of most classroom practice post pandemic.

Lessons learnt from the pandemic

160. The necessary suspension of inspection during Covid-19 meant that any variation in quality of provision during the pandemic could not be easily identified. This potentially hampered sharing best practice and providing support for schools that were in more challenging circumstances.

161. An alternative inspection framework for evaluating learning and education in a way that prioritises sharing best practice, evaluating risk and supporting schools and parents could be developed.

162. Key minimum standards for education in time of school suspension could be developed. The focus of inspection could pivot to providing best practice guidance based on short virtual visits.

163. This would provide real-time feedback to regulators on the capacity and effectiveness to provide education and could inform decision-making much earlier.

164. The impact of any future pandemic on children's learning and education could be mitigated by including pandemic planning as a requirement of the management of risk. This could be included as a specified Standard, and readiness could be probed at each inspection.

165. ISI could prepare for a future event of this nature in the following ways:

- Putting business continuity planning in place specifically for pandemic/mass school closure, including developing a school closure scenario inspection framework and possible review framework for circumstances in which on-site inspection is not possible.
- Adaptation of the inspection framework and methodology during a pandemic to prioritise evaluation of the impact of closure pupils' learning and wellbeing, support schools and disseminate best practice
- Conducting commissioned inspections in response to safeguarding concerns.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief of its truth.

Signed: | Personal Data |

Dated: 18 August 2025