

Implementation Review Unit



Implementation Review Unit Interim Report

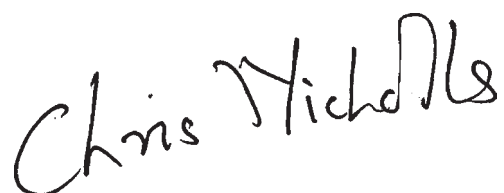
April – November 2003

Foreword

The Implementation Review Unit was formed in April this year as the first ever independent scrutiny group to cut red tape and reduce bureaucracy in schools.

Since then, we have achieved much, but we are conscious that this is just a start. This interim report outlines our work to date – our specific achievements, such as the introduction of a new system of impact assessments in the Department for Education and Skills, as well as the work we have done with agencies and policy teams that is still in its initial stages.

We are indebted to a number of organisations and individuals for contributing towards our research and assisting us in tackling the difficult issues associated with reducing bureaucracy. I would like to take this opportunity to thank them, and to urge school staff to continue to contact us with the issues that they would like us investigate. The task we face is considerable, but we know we can rely on the support of those we seek to help.

A handwritten signature in black ink that reads "Chris Nicholls". The signature is written in a cursive, slightly slanted style.

Dr Chris Nicholls,
Headteacher of Moulsham High School and Chair of the IRU

Members



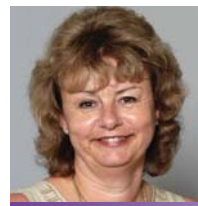
- **Dr Chris Nicholls (Chair)**
Secondary Head
Essex
East of England



- **Mrs Marcia Twelftree**
Secondary Head
Windsor & Maidenhead
South East



- **Ms Heather Flint**
Secondary Head
Richmond-Upon-Thames
London



- **Ms Sue Barratt**
Primary Head
Birmingham
West Midlands



- **Mrs Ros Gulson**
Secondary Head
Lincolnshire
East Midlands



- **Mr Gordon Lester**
Primary Head
Wirral
North West



- **Mr Richard Brown**
Secondary Principal
Wakefield
Yorkshire & the Humber



- **Dame Dela Smith**
Special School Head
Darlington
North East



- **Mr Andrew Fielder**
Primary Head
Cornwall
South West



- **Mr Michael Grant**
Secondary Teacher
North Lincolnshire
Yorkshire & the Humber



- **Mr Tony Wright**
Primary Teacher
North Tyneside
North East



- **Mr Graeme Hornsby**
Secondary Bursar
Leicestershire
East Midlands
-

“ A concerted attack will be made on unnecessary paperwork and bureaucratic processes for teachers and headteachers. An independent Implementation Review Unit will be established in England, to consider the impact both of existing policy operation and potential new initiatives and to address issues of excessive bureaucracy. The focus will extend beyond the DfES and will cover all bodies which impact on schools, including national agencies such as Ofsted, QCA and TTA, as well as local education authorities and learning and skills councils. ”

Raising Standards and Tackling Workload: a National Agreement, 2003.

Making a start

- 1.** This is the Implementation Review Unit's first interim report, covering the period from its formation and induction of panel members at the end of April to the end of November 2003. It is intended to provide a mid-year account of our activities, progress made and plans for the remainder of the year. We expect to publish our first annual report at Easter 2004.
- 2.** The Implementation Review Unit is an independent panel of 12 experienced school practitioners from across England, which was set up as a key part of the National Agreement on raising standards and tackling workload. Our remit is to ensure that bureaucratic and workload implications of both new and existing policies are kept under rigorous review, and to advise on how red tape and bureaucracy in schools can be minimised.
- 3.** Our members include representatives from the primary, secondary and special school sectors, head teachers, senior teachers and support staff, and are drawn from each region of the country. The panel is chaired by Dr Chris Nicholls.

4. In our first year, we have set out to:
 - review and improve the effectiveness of arrangements in DfES and other national and local agencies for assessing the impact of policies before they are implemented
 - broaden our knowledge and networks, so we have a better understanding of the issues affecting a wider range of schools
 - identify and investigate in more detail some existing policies which schools consider have created particularly unnecessary burdens in their implementation
 - start making a real difference in practical terms that enable teachers in our schools to make better use of their time.

Assessing the impact of policies before they are implemented

5. Our first target has been to strengthen systems to ensure that the impact of policies is properly assessed before they are implemented, starting in the DfES itself. We are not looking to put ourselves in the position of “gatekeepers” for every new initiative, but to provide the pressure and support needed for the system to become more effectively self-policing.
6. Before our first meeting with the Secretary of State and David Miliband in July, we looked at all the initiatives planned for six months ahead and concluded that not enough was being done to ensure that volumes were manageable or that the overall impact would be coherent from the perspective of an individual school. When we met the Ministers we put forward recommendations for the introduction of a new and systematic approach to impact assessment. We are pleased now to be able to report that these recommendations were accepted and have recently been implemented. The Panel regards this as potentially an extremely important step forward.
7. The new approach will mean that the workload implications of each new initiative are systematically assessed in the context of an overall strategy for the relevant sector, and Ministers have this information when they make decisions. The Panel will monitor the system through receiving termly summary reports and undertaking selective reviews of individual impact assessments both before and after implementation.

8. Beyond DfES, we have conducted initial reviews of the arrangements in most of the other main national bodies and a sample of LEAs as part of a programme of visits conducted earlier this term. All those we have met have shown a strong recognition of the issues and a willingness to tackle them, but we do not underestimate how difficult it will be to make progress and achieve greater coherence across the whole range of different bodies.
9. We have also scrutinised selected individual policies in advance of implementation, calling in the relevant DfES officials. These included
- the **Freedom of Information Act**, where we welcomed the development of a model scheme which should help to minimise the burden of compliance on schools
 - **Educational Maintenance Allowances**, where we expressed strong concern about new and more frequent attendance returns for which we felt the costs should be met if they were to go ahead
 - **“Every Child Matters” Green Paper**, where we have flagged up the need to align plans with school workforce reforms and we will be keeping closely in touch with future developments.
10. Over the remainder of the year, we will look at more individual policies, such as the potential impact of proposed new guidance on child protection, but our main priorities will be (a) to ensure the new approach to impact assessment is properly embedded in the DfES and (b) to follow through the initial reviews of procedures in other national agencies and in LEAs.

Broadening our knowledge and networks

11. We have been determined from the outset to act on evidence and not hearsay. As a group we needed not just to get to grips quickly with how the various national organisations work, but to broaden our knowledge of other schools and their issues so we could speak authoritatively as practitioners reflecting experiences beyond our own individual schools. Action so far includes:
- Setting up a dedicated telephone helpline (020 7273 6273) and website www.dfes.gov.uk/iru, administered by our secretariat. These were publicised through leaflets and posters that were sent to all schools in September. We are

seeking to encourage all school staff to tell us about the unnecessary workload and bureaucracy they would most like the Panel to tackle. So far we have taken more than 100 calls and emails.

- Visits by panel members to 20 primary schools across the country during the summer term to gain a better understanding of their workload and bureaucracy concerns. The schools visited included a mix of large and small, urban and rural schools. Areas raised by school staff with the IRU included increasing local autonomy, reducing amounts of paperwork particularly associated with SEN, data collection, and the number of separate initiatives and funding streams. Feedback from the visits was used to shape our future work plans, and key points were raised at our July meeting with Charles Clarke and David Miliband. A full report of the visits can be found on our website.
- A similar programme of visits to secondary schools will be completed shortly. Again, we will follow up issues raised and a report of our findings will be published on the website.
- Visits to LEAs to assess the ways in which they monitor the information that they send out to schools. We discussed our findings at meetings with Confed and the National Employers' Organisation for School Teachers, and have sent a joint letter asking Directors of Education to review their gatekeeping systems.
- Regular contacts with the Workforce Agreement Monitoring Group so we can update the signatories to the National Agreement on our work, and they can raise issues with us.
- A series of visits to the heads of major agencies that impact on schools. Organisations included the Teacher Training Agency, Ofsted, the Qualifications and Curriculum Authority, the Learning and Skills Council, and the New Opportunities Fund, and we will shortly be meeting the General Teaching Council. We intend that these visits will be the first in an ongoing relationship with them and we have already outlined the issues that we wish to follow up.

- 12.** Our priorities over the remainder of the year will be to develop local networks to support the work of Panel Members and to continue to follow up issues identified from our visits and contacts.

Investigating the implementation of existing policies

- 13.** We have already selected some issues raised with us about existing policies and practices to investigate in more detail. These include:
- **Paperwork associated with Special Educational Needs.** The IRU was represented at the final meeting of the SEN Ministerial Working Group in September and the continuing burdens on schools relating to SEN provision were highlighted. We have since continued to contribute to plans for future work in this area. We appreciate that the SEN statutory framework would need to change in order to address some SEN issues fundamentally, and will be looking for legislative solutions to be given proper consideration. We have also pressed the case for as much concrete action as possible in the short to medium term and we are pleased that a more detailed investigation into the causes of bureaucracy is now underway as part of work to support the SEN Action Programme.
 - **Foundation stage profile.** Primary schools highlighted concerns about the implementation of the foundation stage profile. We have commissioned an ex-primary head to investigate how the profile came to be implemented in the form that it did, why this generated concerns and what can be learnt for the future. The findings from that investigation will be covered in our annual report.
 - **Data collection.** We have set in hand a monitoring exercise with 30 schools to provide a full picture over a year-long period of what data schools are being asked to provide, who is asking them, and how much time it is taking up. This will support a programme of data rationalisation that is already underway.
 - **Copyright licensing.** The first email received by the IRU raised issues about the time taken in schools to assess which licences are needed, and then to apply for them and take part in compulsory sampling exercises. We are working with copyright agencies to identify potential areas which could be clarified or simplified so that the demands on schools can be minimised.
- 14.** Over the remainder of the year, as well as progressing these investigations and making recommendations where appropriate, we will be taking up new issues raised during our visits to secondary schools or registered with us by e-mail.
- 15.** We have also been asked to contribute to a review being led by the Workforce Agreement Monitoring Group of the "Circular 2/98" guidance which was issued five years ago by DfES on reducing bureaucracy.

Making a difference

- 16.** We decided at the outset to target most of our efforts initially on the underlying systems and culture which generates unnecessary workload and bureaucracy in schools. However, at the same time, we have sought to use our influence to achieve changes that will have immediate benefits for schools. This has included a remit to oversee the implementation of the “**Making a Difference Report**” published jointly by Cabinet Office and DfES in March 2003.
- 17.** Below are four examples of where changes already made in the first few months of our existence are resulting in some real and immediate gains for schools and school staff.
- **Duplicate data collection removed.** The Qualifications and Curriculum Authority (QCA) has agreed to remove its separate collection of pupil data each spring, the “DC2”, which is used to support the distribution of test papers. Instead from this year onwards QCA will use information collected by DfES in the Pupil Level Annual Schools Census. The IRU recognises this as a welcome start to the much broader application of the principle that data should be “*collected once and used many times*”.
 - **A simpler application procedure for specialist school status.** Changes introduced in May have simplified and made more transparent the procedures for both initial application and subsequent reapplication. Schools no longer have to submit information that is held centrally or submit duplicate copies of documents. The application form has been reduced from 50 pages to 16 pages and the guidance from over 190 pages to less than 60 pages. If re-applying, schools will not have to complete the full application form, and explanations of good and bad applications can be found on the website. For further details, see: www.standards.dfes.gov.uk/specialistschools/
 - **More flexibility around the Annual Meeting with Parents.** From September, more flexibility has been introduced in the regulations governing the Annual Meeting with Parents. There are now no stipulations on procedures for how the meeting should be run, and there is a list of circumstances which can exempt a school from holding a meeting at all, if alternative opportunities have been provided for parents to meet governors or there is no demand from parents for a meeting to be held. The IRU welcomes this as a step in the right direction, but we would like to see more deregulation in this area. Schools should be held to account for how well they communicate with parents, but it is not necessary to regulate in detail how effective communication is achieved. We intend to continue discussions

with DfES to identify where there is scope for more deregulation, including amendments to primary legislation when the opportunity arises. Further details about the changes already made in regulations governing the Annual Meeting with Parents can be found on: www.governornet.co.uk

- A Single Education Plan for LEAs. It was announced in October that a Single Education Plan will replace the 14 separate education plans that LEAs currently have to produce. 13 pilot LEAs will move to a single plan in April 2004, with rollout to the rest of the country in 2005 and 2006. We welcome this development, which we believe will lead also to reductions in bureaucracy for schools. Further details can be found at: www.dfes.gov.uk/consultations2/31/

- 18.** Over the remainder of the year, we will be looking to secure a longer list of specific changes and we will publish this in our annual report with a fuller account of progress made in implementing the **“Making a Difference Report”**.

What next?

- 19.** We are pleased with the way in which our initial work is developing, but very conscious that this is only a start. We do not have statutory authority and we are reliant on the goodwill of those with whom we work in DfES and other organisations. The relationship so far has been open and constructive, and we have felt well-supported. We hope that can continue. There is a lot more to do in each of the four main areas where we have focused our attention, and we will be looking in particular to ensure that systematic impact assessment is implemented effectively to control the future stream of initiatives.
- 20.** We will continue to shape our future programme of work in response to feedback from school staff highlighting examples of unnecessary workload and bureaucracy. Comments and concerns can be registered on our telephone helpline (0207 273 6273) or our website at: www.dfes.gov.uk/iru
- 21.** Beyond that, there are significant underlying issues about the whole way in which reforms are implemented and monitored, and how schools are held to account for their progress. We believe that features of the current approach lead inherently to more heavy-handed bureaucracy than is either necessary or productive. Serious discussions are now underway with the DfES about these issues and how things could be done differently. It is too early to report specific outcomes, but we hope to be able to say more by the time we publish our annual report at Easter 2004.

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