

YoungMinds response to the consultation on the Ofsted Education Inspection Framework 2019

Introduction

This submission provides YoungMinds' response to the draft proposals set out in the [Education Inspection Framework 2019](#) and the accompanying inspection handbooks.

YoungMinds is the UK's leading charity fighting for children and young people's mental health. At YoungMinds, our insights and recommendations are informed by the experience of children, young people, parents and carers, and the professionals that we work with, as well as evidence and data that we have collected or commissioned.

We currently work with schools and colleges all over England. In the past two years, we have trained over 10,000 teachers, school leaders and other school staff in academic resilience¹. We also run a 360 Schools' Community - a free digital and e-comms platform for school staff to share information, top tips and best practice relating to resilience building, wellbeing and mental health. Currently more than 8,000 school staff across England are part of our 360 Schools' Community².

This submission will draw heavily on the insights from our 360 Schools' Community, as well as the lived experiences of children, young people, parents and carers, and specific research that we have commissioned.

Key Messages:

- YoungMinds welcomes the broad direction of travel of the new inspection framework, which we believe will mark a significant change in the culture and role of inspections, for the benefit of children and young people, and staff alike.
- However, the draft framework does not give sufficient consideration to evaluating the role that schools and colleges play in supporting their pupils' mental health, or in promoting good mental health and wellbeing.
- This is despite significant developments in education policy in the last three years, which aim to support and empower schools and colleges to develop and implement whole-school approaches to mental health and wellbeing.
- YoungMinds recommends that the inspection framework should be strengthened in line with existing Departmental guidance to make it clear that inspectors will recognise and assess the role of educational providers' in:

¹ More information about the training that YoungMinds' delivers in schools -

<https://youngminds.org.uk/find-a-course/academic-resilience-a-whole-school-approach-training/>

² More information about YoungMinds' 360 Schools' Network -

<https://youngminds.org.uk/youngminds-professionals/360-schools/>.

- Developing and implementing a whole school approach to mental health and wellbeing;
- Developing and implementing processes to provide or facilitate early support when there are concerns about a student’s mental health;
- Ensuring that behaviour management policies and practice are informed by an understanding that behaviour can be an indicator of mental health needs or other underlying problems.

Consequently, YoungMinds recommends two specific changes to the draft Education Inspection Framework (listed in the text box below), which would also need to be reflected in the grade descriptors within the inspection handbooks.

YoungMinds recommends the following changes to the Education Inspection Framework:

- 1) The **Leadership and Management** judgement is amended to include an additional point:
 - “The provider creates a whole school culture and positive learning environment, which fosters resilience, wellbeing, and good mental health for both learners and professionals. Early support is provided where difficulties arise”.
- 2) The **Behaviour and Attitudes** judgement is amended to include an additional point:
 - “The provider’s approach to behaviour management recognises behaviour as communication and emphasises the importance of identifying and addressing the underlying causes of behaviour, which disrupt learning.”

1) YoungMinds welcomes the broad direction of travel of the new Education Inspection Framework

At YoungMinds, we welcome many of the changes included in the draft Education Inspection Framework and inspection handbooks. We believe that the broad direction of travel marked by the draft framework will significantly change the culture and role of inspections for the better.

Ofsted inspections can have a significant influence on the priorities and activity of educational providers. Therefore, we are delighted that the draft framework has a reduced focus on performance data and outcomes, and a greater emphasis on the quality of teaching and education. The strong focus on performance data and outcomes under previous frameworks contributed to the development of a culture, which was disproportionately focused on exam grades, and built pressure and stress

for students, teachers and school leaders³. In a survey carried out by YoungMinds, 80% of young people stated that exam pressure had significantly impacted their mental health, whilst 96% of young people stated that exam pressure had some impact on their mental health⁴.

YoungMinds' welcomes the shift towards evaluating education providers' approaches to providing for learners' broader development, "beyond the academic, technical or vocational". Moreover, we fully support the decision to separate the previous "Personal development, behaviour and welfare" into two distinct judgements.

We are pleased that Ofsted plans to take a firmer stance against the practices of off-rolling and gaming, which evidence suggests disproportionately affects children and young people with special educational needs and disabilities, including those with social, emotional and mental health difficulties⁵.

Finally, we welcome the ambition to strengthen the role of Ofsted inspections as a force for improvement. We believe that a greater recognition and assessment of provider's wider approaches to promoting wellbeing and mental health would drive improvement by enabling more school leaders to prioritise mental health and wellbeing in improvement and development planning.

2) The draft framework does not go far enough in recognising or assessing the role of schools and colleges in promoting or supporting mental health.

We welcome the judgement that demonstrates that providers will be assessed on how the curriculum helps learners' know how to keep themselves physically and mentally healthy, which reflects the forthcoming introduction of relationships, sex and health education.

However, beyond that, the draft framework and inspections handbooks, provides no explicit indicator that gives no explicit consideration to demonstrate that inspectors will be expected to assess the role of schools or colleges in promoting wellbeing and mental health, or supporting the mental health of their students. We are concerned that this will send the message to schools and colleges that any work that they do on promoting mental health, wellbeing or resilience will not benefit their overall Ofsted rating.

The previous iteration of the Ofsted inspection framework included within its "Personal development, behaviour and welfare" judgement" a similar assessment of

³ National Union of Teachers (2015) [Exam Factories? The impact of accountability measures on children and young people.](#)

⁴ YoungMinds, [Wise Up: Prioritising Wellbeing in Schools](#) (2017)

⁵ Ofsted, CQC, [Local Authority SEND inspections: One Year On](#) (2017)

the knowledge gained by pupils of how to “keep themselves healthy, both emotionally and physically”⁶.

However, despite this judgement, research has demonstrated that inspections did not routinely focus on the promotion of mental health and wellbeing in schools and colleges. An analysis by the Institute for Public Policy Research (IPPR) of a sample of 50 Ofsted inspection reports that took place after September 2015 showed that just one in three reports (32%) include an explicit reference to pupils’ mental health and wellbeing⁷.

We have heard directly from school leaders that we have worked with that the perceived lack of prioritisation on mental health and wellbeing in the previous framework acted as a barrier to some school leaders feeling able to prioritise wellbeing initiatives or approaches in school or development planning, despite clear benefits to their students. When school leadership teams have to make difficult decisions about how to spend stretched budgets, it can be hard for them to make wellbeing a priority when they know this will not help their school to maintain or improve its Ofsted rating.

This is problematic as there is clear evidence that mental health and wellbeing can have a significant impact on student’s ability to learn, concentrate, communicate and make the most of their education⁸. Moreover, school and college approaches to wellbeing can have significant educational, health and social benefits for students⁹.

Many schools and colleges already do excellent work on mental health and wellbeing, both in terms of promotion and support. Natcen Social Research carried out a comprehensive quantitative survey on behalf of the Department for Education in 2017, which highlighted the range of provision provided by schools and colleges¹⁰. The research found that the majority of institutions had a plan or policy in place about supporting pupils with identified mental health needs, and more than half had a plan or policy about promoting positive mental health and wellbeing among all pupils¹¹.

At a national level, there has also been a significant change in education policy in the last three years, representing a greater recognition of the crucial role that schools and colleges can play in helping to promote mental health and wellbeing, helping students to build resilience, preventing the develop of mental health problems, and helping students to get early help when problems first emerge.

Through the proposals in [Transforming Children and Young People’s Mental Health: A Green Paper](#), the [CAMHS-Schools Link Pilots](#), and the recently revised Department for Education [Mental Health and Behaviour in Schools](#) guidance – schools and colleges have

⁶ Ofsted, *Common Inspection Framework* (2015)

⁷ IPPR. (2016) Education, education, mental health: Supporting secondary schools to play a central role in early intervention mental health services http://www.ippr.org/files/publications/pdf/education-education-mental-health_May2016.pdf?noredirect=1

⁸ YoungMinds, [Wise Up: Prioritising Wellbeing in Schools](#) (2017)

⁹ Ibid

¹⁰ NatCen Social Research, [Supporting Mental Health in Schools and Colleges](#) (2017)

¹¹ Ibid

been given much greater support, capacity and guidance to implement systematic approaches to promoting and supporting children and young people's mental health.

We believe that it is essential that the Ofsted framework reflects the recent changes in education policy and assesses this important area of school and college provision.

3) The new framework should reflect the effectiveness of whole school approaches to wellbeing and mental health

There are welcome elements within the draft judgements relating to wellbeing, including consideration of staff wellbeing; learners' knowledge about how to keep themselves mentally healthy; relationships among learners and staff that reflect a positive and respectful culture; and an absence of bullying or discrimination.

However, there is a significant omission as the draft judgements do not include explicit consideration of:

- The provider's work in promoting the mental health and wellbeing of learners and staff, and to helping learners to build resilience;
- The processes, practice and structures for ensuring that students' are provided with, or facilitated to support when mental health needs have been identified.

There is a strong and growing evidence base that universal, whole-school approaches to wellbeing, and social and emotional learning, can have a range of benefits for individual students, staff and whole-school populations¹², including higher engagement, attendance and academic attainment, improved behaviour, reduced anxiety, bullying and stigma¹³. There is also some evidence that social and emotional learning programmes can have particular benefits for children who come from lower-income backgrounds or are performing below average academically¹⁴.

Evidence has consistently shown that a co-ordinated and systematic whole school approach to wellbeing has the greatest impact on children's outcomes. This is recognised by Ofsted in its *Overview of the Research* that informed the development of the draft framework¹⁵. Moreover, a number of quantitative research studies^{16,17} have demonstrated that a significant number of schools already have policies, plans or strategies in place – of varying quality and scope – for promoting and / or supporting the mental health of its students.

¹² Weare, K and Nind, M (2011) Mental health promotion and problem prevention in schools: what does the evidence say?, *Health Promotion International*, Vol. 26 No. S1 Oxford: OUP

¹³ Banerjee R et al (2016) *Promoting Emotional Health, Wellbeing and Resilience in Primary Schools*

¹⁴ Challen A, Noden P, West A and Machin S (2011), *UK Resilience Programme Evaluation: Final Report*

¹⁵ Ofsted, *Education Inspection Framework: Overview of Research* (2019)

¹⁶ NatCen Social Research, [Supporting Mental Health in Schools and Colleges](#) (2017)

¹⁷ Department for Education, *Mental Health and Wellbeing Provision in Schools* (2018)

Recently revised Department for Education guidance on *Mental Health and Behaviour in Schools* states that “a school’s approach to mental health and behaviour should be part of a consistent whole school approach to mental health and wellbeing”¹⁸. The guidance goes on to describe the key elements of such a comprehensive systematic approach. Whilst one of the key functions of the new Designated Senior Lead for Mental Health role, introduced through [Transforming Children and Young People’s Mental Health: A Green Paper](#), will be to develop a whole school approach to wellbeing.

YoungMinds recommends that the Leadership and Management judgement in the draft inspection framework should be amended to demonstrate that inspectors will assess whether school leaders have plans to develop a strategic and systematic approach to promoting and supporting the mental health of learners and staff.

4) When a student has an identified mental health need, the provider should have processes and procedures in place to provide, or facilitate appropriate support

One central and essential element to a whole school approach to mental health and wellbeing is the presence of a graduated response process for when a school suspects that a pupil is having mental health difficulties.

Department for Education guidance sets out the plans and procedures that schools should have in place if they are concerned that a student is experiencing mental health difficulties, which should encompass a range of support options from pastoral care, to a clear referral process to CAMHS. The guidance also makes it clear that this process should be communicated clearly to all staff¹⁹.

When a child or young person is experiencing mental health problems, emotional distress or low wellbeing, it can disrupt their ability to learn, concentrate and communicate effectively. Moreover, enduring unmet or unidentified need can also lead to student’s taking extended periods of time of school.

Evidence shows that students with social, emotional and mental health difficulties are significantly more likely than other groups with a Special Educational Need or Disability (SEND) to be excluded from school. In 2013/14, one in five students with an identified social, emotional and mental health difficulty received at least one fixed period exclusion (26, 600 in total)²⁰; whilst 1, 510 (over 1%) received a permanent exclusion²¹.

It is important that schools and colleges are equipped to respond to mental health concerns, as they are already on the frontline when it comes to children and young people’s mental health. The most recent prevalence survey of children’s mental health

¹⁸ Department for Education, *Mental Health and Behaviour in Schools* (2018)

¹⁹ Ibid

²⁰ Department for England (2014), ‘Children with Special Educational Needs: Absence and Exclusions’ - <https://www.gov.uk/government/publications/sen-absences-and-exclusions-additional-analysis>

²¹ Ibid

demonstrated that 48% of children and young people with a diagnosable mental health condition approached a teacher for advice in the previous year, this is more than any other profession, including their GP. Children without diagnosable mental health conditions were also more likely to approach their teacher for advice about mental health than any other professional²².

The latest NHS evidence states that one in eight (12.8%) children and young people between the age of 5-19 has a diagnosable mental health condition, which represents more than three children in the average classroom²³. Whilst, we know that half of all mental health problems manifest by the age of 14²⁴.

The number of referrals to CAMHS has increased significantly in recent years²⁵, whilst 90% of school leaders have reported an increase in the number of students experiencing anxiety or stress over the last five years²⁶.

When children and young people have unmet mental health needs there can also be an increased risk of harm or unnecessary escalation of need. This is even more concerning given that currently less than one in three children and young people with a diagnosable mental health condition receives any NHS care or treatment.

Consequently, there are likely to be hundreds of thousands of young people currently in education, who have a diagnosable mental health condition, but are not receiving NHS support. It is essential that schools and colleges have processes in place to be able to adapt teaching strategies, and to provide or facilitate additional support to enable children who are experiencing mental health problems to continue their education, and to stay safe.

Through the proposals set out in [Transforming Children and Young People's Mental Health: A Green Paper](#), the Government are piloting the introduction of Mental Health Support Teams, a new workforce of professionals to provide assessment and early-intervention in schools and colleges. However, this will only be rolled out to, at most, a quarter of the country by 2022/23.

²² NHS Digital, [Mental Health of Children and Young People in England](#) (2017)

²³ Ibid

²⁴ Kessler RC et al. (2005), 'Lifetime Prevalence and Age-of-Onset Distributions of DSM-IV Disorders in the National Comorbidity Survey Replication'

²⁵ NHS Providers, *The State of the NHS Provider Sector* (2017)

²⁶ Association of School & College Leaders, & National Children's Bureau, (2016), Keeping young people in mind – findings from a survey of schools across England, www.ascl.org.uk/download.D91C5B0A-72A6-4117-96A9B343E51FB296.html

YoungMinds strongly believes that schools and colleges should be assessed and recognised for the support they have for their pupil's mental health, and that this should be made explicitly clear within the Leadership and Management judgement, as part of a systemic whole school approach to mental health and wellbeing.

YoungMinds recommends that the **Leadership and Management** judgement is amended to include an additional point:

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

5) The Behaviour and Attitudes judgement needs to demonstrate that behaviour can be an indicator of mental health needs or other underlying problems.

Children and young people's behaviour can change over time, depending on the circumstances they face, and the support they receive.

Children and young people who face adversity, or complexity in their lives, are more likely to adopt risky or challenging behaviour, including harmful sexual behaviours and substance misuse²⁷. The responses that these young people receive from services, including their school or college, can too often focus on managing their behaviours, rather than identifying the causes of any underlying health or safeguarding needs²⁸.

Guidance on *Mental Health and Behaviour in Schools* from the Department of Education (2018) describes how certain types of behaviour, or changes in behaviour can be a communication of mental health needs or other underlying problems, such as adversity, or child protection issues²⁹.

The guidance provides advice for school staff to help them to understand the links between mental health and behaviour; as well as providing advice on how schools can identify children with possible mental health problems, and how schools should respond when they suspect that a pupil is experiencing mental health difficulties³⁰.

Furthermore, statutory guidance from the Department for Education makes it clear that “where a school has concerns about a pupil's behaviour, it should try to identify whether there are any causal factors and intervene early”³¹.

In the draft Education Inspection Framework the focus of the Behaviour and Attitudes judgement is on tackling behaviour that disrupts learning. Whilst, we broadly agree

²⁷ YoungMinds, *Beyond Adversity* (2016)

²⁸ YoungMinds, *Addressing Adversity* (2018)

²⁹ Department for Education, *Mental Health and Behaviour in Schools* (2018)

³⁰ Ibid.

³¹ Department for Education, *Exclusion from maintained schools, academies and pupil referral units in England* (2017)

with the requirements that schools should have high expectations for behaviour and conduct, we are concerned that this contradicts Departmental guidance and sends the wrong message to providers: that behaviour management is solely about eradicating disruptive behaviour and not taking any action to address underlying causes of this behaviour.

We think that the Behaviour and Attitudes judgement needs to be amended so that schools and colleges are encouraged to identify and address the underlying causes of behaviour when they are concerned that the behaviour may be indicative of a mental health need or other problem, as is made clear in Departmental guidance.

YoungMinds recommends that the **Behaviour and Attitudes** judgement is amended to include an additional point:

- “The provider’s approach to behaviour management recognises behaviour as communication and emphasises the importance of identifying and addressing the underlying causes of behaviour, which disrupt learning.”

6) Providing appropriate training and guidance for inspectors to assess school and college approaches to mental health and wellbeing

As previously described, YoungMinds believes that the draft Education Inspection Framework, and the grade descriptors in the inspection handbooks, need to be strengthened to ensure that inspectors recognise and assess the role of schools and colleges in promoting and supporting students’ mental health.

To ensure that inspections are fair and consistent - and drive improvement in school and college approaches to mental health and wellbeing - inspectors would need to have clear lines of inquiry to help them to assess whether the provider had adequate processes, systems and structures to meet the requirements in the judgement.

Based on insights from our 360 Schools’ Community and our training in schools, we have listed below some examples of the types of processes, systems and activities that could demonstrate best practice in regards to a whole school approach to wellbeing, or an approach to behaviour management that recognises behaviour as communication. These are not exhaustive, and we would be happy to have further discussion about potential key lines of inquiry for inspectors when assessing approaches to wellbeing and mental health.

- Evidence that building understanding and awareness of mental health, wellbeing and resilience has been prioritised in Continuing Professional Development for staff.
- A trained and supported Designated Senior Lead for Mental Health, who sits on SLT or is actively involved in decisions about developing a whole school approach to wellbeing or mental health.

- Parents and carers having a named contact within the school or college who they can approach with wellbeing, social or welfare concerns affecting their child or other learners.
- Data demonstrating a proactive assessment of need in relation to different vulnerabilities - including mental health needs – and children with multiple risk factors; as well as evidence of strategies for planning approaches around this assessment of need.
- Activities to reduce stigma around mental health issues (such as assemblies on mental health, mental health champions or ambassadors, activities relating to World Mental Health Day, signposting to appropriate online resources or local support services).
- A clear policy and set of procedures describing the levels of support and intervention for students at risk of, and experiencing mental health difficulties, from the universal offer to specialist multi-agency involvement.
- Budgetary consideration for pastoral care resources, including staffing resource, but also practical things, such as spare school uniform.
- Strategic prioritisation of a systematic approach to promoting and supporting the mental health of students within improvement or development planning.
- Processes to trigger a pastoral meeting or additional support following a certain number of repeat or escalating behaviours.
- Evidence in the physical school environment of clear accessible signposting for students to a range of support services (such as external services or online self-management tools).
- A choice of places where students can go at break times, where students feel safe, and can have some quiet time.

Finally, in addition to clear and appropriate lines of inquiry, we also believe that it is important that inspectors have sufficient training so that they have a strong understanding and awareness of mental health, wellbeing and the protective factors that help young people to build emotional resilience.

We would like to see more detail within the inspection handbooks on the wider training provided for Ofsted Inspectors in relation to these areas, and how inspectors are trained to recognise and understand the wider culture and context that the school is operating in.

Further Details

If you would like to discuss any of the points raised in YoungMinds' submission, or if we can be of any further assistance in regards to the development and implementation of the framework, or the development of key lines of inquiry for inspectors, please contact:

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