Inspecting school groups

Principles and high level model

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The voice of school trusts

Introduction

In its election manifesto, the government said it would “bring Multi-Academy Trusts into the inspection system.” The introduction of inspection of school groups is largely unchartered territory. It is complex work and it will need to navigate a range of competing tensions and unintended consequences. It is vital, therefore, that time is taken to develop the best approach. It should not be rushed.

CST’s priority is to ensure it is designed in a way that is pragmatic, efficient, and genuinely strengthens the system.

CST believes this policy area should be framed as ‘group inspection’ rather than solely ‘trust inspection’ given that trusts are not the only type of responsible body operating multiple schools. At the same time, it is important to recognise that trusts already face robust public accountability: through external audit, oversight from Regions Group, and every time one of their schools is inspected. If group inspection applies only to trusts, government should explain what parallel accountability arrangements exist for other groups.

Government’s case for group inspection must demonstrate clearly how this policy will add value to the system and ultimately to children. It should not be inspection for inspection’s sake.

Trusts educate more than half the nation’s children. The narrative and policy must ultimately be designed to improve public services, building public confidence and serving children, families, and the wider public. The rationale must be grounded in helpful additionality, not implied deficiency.

Engagement with the sector is critical to ensure inspections are effective, proportionate, and avoid duplication. Policy design must take meaningful account of the diversity of groups: size, geography, phase, and specialist provision. It must also ensure group inspection does not disincentivize trusts from taking on schools that need their support.

This policy paper explores six key areas that must be considered before inspection methodologies are developed (purpose, definition, coherence, evidence base, judging and reporting, and practicalities). It then proposes a high-level model for group inspection.

Key considerations

1. The purpose(s) of group inspection

A clear purpose is essential to ensure group inspection delivers benefits and avoids unintended consequences. Inspection could serve several purposes:

i) Public assurance: establishing standards and providing transparent information on group performance.

ii) Informing regulatory, support, and intervention decisions.

iii) Supporting improvement (while recognising that responsibility for improvement rests with groups, not Ofsted).

iv) Contributing to system-level learning through the identification and dissemination of effective practice.

There must be a clear articulation of the intended purpose(s) of group inspection. As part of this government must be able to demonstrate how a new layer of education inspection would represent good value for the public purse. Given every state school is already routinely inspected, a clear articulation of the purpose and value of group inspection should act as the keystone in this policy development.

2. Defining a 'group'

Government must define what constitutes a "school group." While trusts are consistent in having a single overarching responsible body and acting as the employer across their schools, not all other group types are constituted the same way. Government must decide on a definition of school groups for the purposes of inspection, and this should be consistent with its wider policy on schools and groups of schools.

All equivalent organisations considered by government to be groups should be included within the inspection framework. Excluding some would create incoherence and inequity, leaving blind spots, inequities and perverse incentives in the accountability system.

3. Coherence with existing accountability systems

The regulation and accountability ecosystem

CST has consistently argued that accountability should be underpinned by a clear regulatory strategy. Mapping actors, powers, and accountability relationships is essential to ensure coherence with existing frameworks and to identify necessary adjustments.

CST has developed and articulated a *Building strong trusts assurance framework*, which sets out seven domains of trust strength, with trusts using the tool to diagnose areas of strength and challenge so that strategic work can be undertaken from a position of deep knowledge about the organisation.[1] The Department for Education has published its own framework for high-quality trusts, which draws on many of the same themes, underpinned by a set of trust quality descriptors.[2]

While it would make sense for group inspection to be cognisant of these frameworks and helpfully aligned where appropriate, neither are inspection frameworks. It is plausible some of the domains outlined in CST's framework, or the Department for Education's framework, cannot be inspected with reliability and validity, or that doing so would duplicate accountabilities that already exist. Trusts already face significant accountability: financial audits, compliance with funding agreements, the *Academy trust handbook*, and charity and company law. DfE Regions Group acts on behalf of the Secretary of State as the principal regulator of trusts, with significant formal and informal powers of oversight. Inspection must also fit with wider accountability frameworks, including ITT inspection and area SEND inspection. Group inspection must avoid duplicating or conflicting with these mechanisms.

Also, while there are existing quality frameworks for trusts, there are not necessarily equivalents for other types of group. This speaks to a wider and more fundamental consideration: equity. This demands that group inspection must work equitably across the range of group compositions. While this might be about *types* of group, it may also be about their composition. For example, groups might include mainstream only, specialist only, and those with a mix of schools. Group inspection would need to deal equitably with this diversity if it is to avoid driving unintended consequences.

Coherence with school inspection

Group inspection must be coherent with school-level inspection. They are unlikely to influence parental choice in the same way as school inspections do in some communities, so their value must be framed differently. Parents and stakeholders must be supported to understand how the two – potentially conflicting - levels of inspection interact and whether/how outcomes are useful to them. If parents are not an intended primary audience for group inspections, this should feed into the design choices.

Legislation will be needed, as Ofsted currently has no statutory duty to inspect groups. While other bodies could be considered, if the focus is on educational quality Ofsted may be best placed as this would support alignment between school- and group-level inspection. However, inspector expertise gaps would need to be addressed.

Any additional inspection layers must be carefully aligned with school inspection to avoid unnecessary duplication and pressure on staff and leaders. If this realignment of school-level inspection is not possible, it must be treated as a design constraint from the outset.

[1] Confederation of School Trusts, *Building strong trusts: assurance framework*

[2] Department for Education, *Commissioning high quality trusts*

4. A basis in strong evidence

The legitimacy of inspection depends on:

i) A clear, evidence-based conception of trust quality.

ii) A valid and reliable methodology, blending quantitative data with qualitative insights, and supported by an inspection workforce with appropriate expertise.

iii) Proportionality: ensuring stakes match the reliability of inferences drawn.

There is limited academic literature on trusts as organisations in their own right from which to establish well-evidenced definitions of quality. This is not to say that there isn't evidence of trust's efficacy, but rather there has been relatively little research into *how* this has been achieved. More high-quality research is needed, and this should be a priority for government and Ofsted. Without this group level inspections will always be vulnerable to the challenge that expectations are not rooted in evidence and could promote unhelpful practices.

5. Judging and reporting: The opportunity and risk of aggregation

At school level, inspection outcomes are expressed as graded judgements. Even with Ofsted's reforms in September 2025, grading has been retained. Extending grading to groups requires careful consideration and clear justification, and should not be assumed simply because these exist at school level.

It is vital that inspection outcomes support rather than discourage trusts from taking on struggling schools, so that years of progress in improving education, in disadvantaged communities especially, can be sustained. Group inspection must not make school improvement too risky to take on.

Any approach must also provide a fair and accurate account of groups with different characteristics, including specialist trusts.

Group-level grades may conflict with school-level grades. For example, how should stakeholders interpret a trust graded differently from its schools? Indeed, there is a philosophical question about how appropriate or meaningful it is to conceive of the quality of the trust as being different to the quality of the schools it operates.

Inspection must provide insights that school-level inspections alone cannot. Any grading system must be justified within a coherent regulatory strategy, including clarity about what regulatory responses would follow from unfavourable judgements.

Aggregation of school-level judgements?

Group inspection methodology could impose alignment between group and school judgements by aggregating school-level judgements to form a group level judgement. However, doing so is problematic:

i) Proponents of school grades argue they provide parents with simple information about local schools. It is unclear that parents would want, need, or use aggregated group-level grades.

ii) Simply aggregating school grades would not capture the potential strategic value of group inspection, as the outcome would simply mirror past inspections.

iii) Timing matters: a group grade could depend heavily on whether recent school inspections reflect improvement or decline.

iv) Validity is a concern as older school inspections may distort the group's aggregated grade. For example, a school inspection from four years before the group inspection may be seen to be less current and valid than a more recent school inspection. A simple aggregation of grades may place weight on old inspections that are about to be superseded by new ones.

New group-level evaluation areas?

An alternative to aggregation of school-level judgements is to develop new constructs (evaluation areas) of group quality, but the evidence base for this is weak and practice differs significantly across groups of different phases, sizes, geographies, and provision type. Applying a complex grading scale, such as a five point scale, at group level would likely be particularly unreliable as a result.

Identifying patterns: taking the strategic view

It must be remembered that many groups, including trusts, will already have sophisticated processes for self-evaluation and strategic planning. So, it will be important to ensure there is not an unintended consequence in which inspection ignores, undermines, or problematises this work. One way to approach this is to incorporate the group's own assessment of its performance so that inspection builds on the groups' existing self-evaluation processes and does not undermine them.

Aggregating school inspection outcomes into a valid and reliable judgment could be challenging, but aggregation of school-level insights may be more useful for identifying patterns and trends in performance across a group.

The reported outcomes of group inspection should reflect the systemic strengths and weaknesses in the educational provision of the group, and evaluate the effectiveness of the strategic work to address them.

6. Practicalities

A new inspection layer requires funding unless offset by reducing other inspection activities. A slim, targeted, and cost-effective model is essential.

Ensuring the group inspection workforce is sufficiently experienced in the sector, phase, and specialist provision where appropriate, is a key concern for CST members. Recruiting credible inspectors with group-level leadership experience will be challenging. Conflicts of interest must be carefully managed, particularly if serving leaders are involved. Establishing the right inspection workforce is fundamental to making this policy work and the sectors involved should be engaged from an early stage in this work.

The frequency of inspection requires careful thought. While it might be tempting to assume group inspection should follow the same routine cycle as school inspection, it may be a little more complex. For one thing, the four-year cycle for routine school inspection Ofsted follows is actually different to the outer limit set in legislation (no longer than five years from the end of the academic year in which it was last inspected). So, legislation that established a four-year cycle for group inspection would in effect establish a legal requirement to inspect groups that is more frequent than for schools. It is arguable this would not represent good value for the public purse.

Consideration should also be given to whether inspection of all groups on a routine cycle is appropriate, or if a risk-based or sampling approach is preferable. While a comprehensive routine cycle may feel more robust to policy makers, this will add cost and burden to the system which will be felt within groups, schools, and the inspectorate. There would need to be a clear value case made for this.

Equally, although a risk-based or sampling approach might be more efficient and less burdensome, it also has some trade-offs. A risk-based system that seeks only to inspect struggling groups might, without careful communication, give the public a misleadingly negative view of the typical quality in England's school groups. And those groups that were inspected might see it as inequitable if others did not undergo the same process.

While a targeted approach could inspect groups of a certain size, there are potential unintended consequences, such as disincentivising groups just under that threshold from taking on additional schools, which could undermine intervention and improvement arrangements.

The key to unlocking this is to return to the first principle: purpose. Policy makers need to think carefully about the problem they trying to solve and build the approach out from that.

Some have suggested inspecting 'back office' functions. This is challenging for three reasons:

i) These functions vary greatly across groups such as trusts, and there is no shared conception of quality to underpin judgements. Without this, there is a risk of coercive isomorphism (DiMaggio & Powell[3]), where practices converge in ways that are not evidence-based or desirable.

ii) The core purpose of groups is to deliver and improve education for children. Group inspection should retain this focus, not be primarily about support and technical functions.

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[3] DiMaggio, P J, & Powell, W W (1983). The Iron Cage Revisited: Institutional Isomorphism and Collective Rationality in Organizational Fields. American Sociological Review, 48(2), 147–160.

iii) Non-academy schools also have equivalent 'back office' operations, with similar potential to impact on education. It would be illogical for these to be important enough to be inspected in groups such as trusts, but be ignored in schools outside of a group.

However, while inspecting back-office functions is potentially problematic, it is important to recognise the group is responsible for the strategic oversight of the schools it runs. Therefore, group inspection would presumably need to take account of this strategic work. So, there is work to be done to identify which parts of a group should fall within the scope of group inspection, but our strong steer is that group inspection should remain strategic and tightly focused, to avoid scope creep.

Government should frame this policy in a way that highlights the robust accountabilities trusts already face - inspection, audit, and regulation - while showing how group inspection can add further value. To achieve this, the model must be lean, well-targeted, and strategic, focused on what only group inspection can provide, adding strategic value beyond what school-level inspection already delivers.

A proposed high-level model for group inspection

Summary of the proposed model

- Legislation should establish a power to inspect, not a duty
- Inspections could be targeted on the basis of:
    - Risk-assessment
    - Sampling
    - Effective practice sharing
    - Requests for inspection
- Key evaluation areas could include:
    - What are the observable patterns in performance across the group's schools?
    - Is the group taking effective actions to improve schools where needed?
    - What is the school improvement capacity of the group?
- While group inspection would likely be deployed where weaknesses might be suspected in an organisation, this needs to be balanced by an approach that finds strengths in the education system too. Without this, the public may get a distorted and adverse view of quality in the education system.
- The outcome should be a written report, not graded, and with a focus on supporting system improvement

The 'Why'

Group inspection aims to surface patterns in school performance across a group of schools, evaluating organisational responses to weaknesses, strong practices, and the capacity of the group to support schools.

The 'What'

Group inspection should focus on the delivery of educational quality for children. Trusts are built from the principle of advancing education for the public benefit. Group inspection should be anchored in this. Consequently, 'back office' functions are beyond the primary scope of group inspection, excepting where they might be directly relevant to the inspection of the strategic leadership of education quality.

The 'When'

A comprehensive, routine inspection cycle akin to the existing school level cycle would be costly and burdensome but a purely risk-based or sampled approach might be seen as inequitable. A solution to this is to leverage the insights from school level inspections and ensure the new 'group' element is as slim as possible, establishing an underlying routine cycle for all groups that takes place over a longer period than the school cycle, but prioritising groups on the basis of a risk-based and sampled approach that is designed to identify strong practice in groups as well as where there are concerns:

- Risk-based inspections, triggered by legitimate school-level concerns or commissioned by regulators.
- Sampling of trusts to assess system trends and report on them at system level.
- Reviews of effective practice to share learning.

The 'Who'

Ofsted should seek to draw on the expertise that exists in the system but ensure it does not remove it from the day-to-day leadership of groups. Therefore, group inspection should be undertaken by a slim team of specialist HMI, supported by well-trained practitioners working in leadership positions in groups, with clearly defined processes for managing potential conflicts of interest.

The 'How'

Legislation should provide Ofsted with a power, not a duty, to inspect groups, allowing flexibility in approach.

While ever a robust and comprehensive school-level inspection process remains in place, group inspection should be oriented towards the exploration of patterns and trends emerging from these inspections, and the group's work in relation to them, rather than adding further inspection burden to schools.

Aggregation of school performance within the group should be oriented towards pattern-identification rather than seeking to give an 'average' view of the group. This is not to say that data containing averages shouldn't be used in the inspection method, but rather is an attempt to describe an inspection system which seeks to provide a strategic view of performance to support improvement, rather than a blunt label.

It is too early in the development process to specify the specific methodology and instruments that should be used. Rather, evidence needs to be assembled and approaches will require extensive piloting. This should be done in collaboration with the relevant sectors.

Inspection outcomes

A graded system is unlikely to be valid or reliable and would add pressure without clear benefits. Instead, outcomes should be written reports that identify key patterns in school quality within the group, and the effectiveness of the group's response to weaknesses. This approach ensures accountability without unnecessary burden and avoids distorting behaviour through high-stakes grading or risking incoherence with school-level graded judgements. Ofsted's 'Summary Evaluation' process may provide a useful reference point for the design of this work.

Conclusion

Group inspection is a significant policy shift. It must be designed carefully to avoid adding complexity without clear benefits. By focusing strategically on pattern-identification in performance and organisational responses to improvement, group inspection can add value without undermining trust autonomy or school leadership. The education sector must play a central role in shaping this policy to ensure it genuinely strengthens the system rather than only adding burden

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