

Discussion paper

Setting the standards in 'standards'

What the new trust standards should be
– and why a distinction with descriptors
matters

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**Confederation
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The voice of school trusts

Executive summary

Through the 2026 Schools White Paper, *Every child achieving and thriving*, the Government has committed to develop a new set of trust standards, which will inform the framework Ofsted uses to inspect school trusts. This is a significant and welcome moment. Done well, trust standards could give the sector an enduring, shared articulation of what a good trust is for. Done poorly, they risk becoming something quite different: a list of any given Government's priorities, restyled as "standards" and wired into commissioning and inspection.

This paper argues that the difference between a standard and a descriptor is not semantic. It is fundamental, and it has been worked out carefully in other professions and in regulatory theory. Our central messages are:

- A genuine standard is a high-level, enduring statement of what good looks like, expressed as principle rather than prescription. It is stable across governments, owned with the profession, and changed rarely and deliberately. The *Teachers' standards*, the General Medical Council's *Good medical practice* and the Nolan Principles all share this character.
- A descriptor is a granular, time-bound specification of less enduring priorities. Descriptors have their place – but when priority-driven descriptors are labelled "standards" and attached to commissioning and inspection, they import instability and politicisation into the heart of the system.

Regulatory scholarship on principles-based versus rules-based regulation maps almost exactly onto this distinction, and warns of a predictable failure mode: over-prescription drives "creative compliance" and tick-box behaviour, and erodes professional judgement.

The four themes already trailed for the trust standards (inclusion, standards, value for money and community collaboration) are reasonable priorities. But priorities are not standards. The test of a standard is whether it would still read as right in fifteen years' time, under a different government.

We therefore set out six design principles for genuine trust standards, and invite the Department for Education to build them in from the outset.

CST supports the development of trust standards. Our argument is constructive: we want them to succeed, and to endure. This paper explains how.



1. Why this matters now

The 2026 Schools White Paper, *Every child achieving and thriving*, confirmed that the Department for Education will develop a new set of trust standards and that Ofsted will inspect school trusts against them (DfE, 2026).¹ The Department has indicated that these standards will focus on four areas: inclusion, raising standards, value for money, and community collaboration.

This builds on a longer trajectory. The Government's regulatory and commissioning review led the Department to develop "trust quality descriptions" (widely referenced as trust quality descriptors) to inform regional directors' commissioning decisions.² Alongside these sit the established requirements of the *Academy trust handbook* and the sector's own work, including CST's *Building strong trusts* assurance framework.³

The sector should welcome the ambition to articulate what a good trust looks like. The question this paper raises is one of design, not of intent. Whether what emerges is genuinely a set of standards, or a set of descriptors wearing the name, will shape the system for years to come. The history of the language is itself instructive: the Department's earlier work used the word descriptors; the White Paper uses the word standards. These words are not interchangeable, and the choice between them carries real consequences.

¹ Department for Education (2026) *Schools White Paper: Every child achieving and thriving*.

² Schools Week (2023) '[DfE fleshes out new academy trust quality descriptors.](#)'

³ Department for Education (2025) *Academy trust handbook*.

Confederation of School Trusts (2023) *Building strong trusts: Assurance framework*.



2. What is a standard?

A standard, properly understood, is an enduring statement of what good looks like in a domain of professional practice. It expresses purpose and principle. It is written at a level of generality that allows it to hold across widely varying contexts and to remain valid over time. The *Teachers' standards*, for example, require that a teacher “set high expectations which inspire, motivate and challenge pupils” – a statement as true today as in 2011, and as applicable in an infant school as in a sixth-form college.⁴

Three features distinguish a standard from other kinds of policy instrument:

- **Principle, not prescription.** A standard states the objective and trusts professional judgement to apply it in context. It does not attempt to specify contributory actions in advance.
- **Stability over time.** A standard is designed to endure. It is revised rarely and deliberately, so that it can function as a fixed point against which practice develops.
- **Professional ownership and legitimacy.** A standard is recognised and owned by the profession it governs, not merely imposed on it. That shared ownership is the source of its authority. This speaks to a necessity for standards to be the subject of proper consultation with the sector, and opens the possibility for meaningful co-construction.

This conceptual distinction has been worked out most fully in regulatory theory, where it appears as the contrast between principles-based and rules-based regulation. Principles-based regulation relies on “high-level, broadly stated” principles that set the standards by which those regulated must operate, using qualitative terms such as “fair” and “reasonable”.⁵ Rules-based regulation relies instead on detailed, prescriptive requirements that leave little room for interpretation. Standards, in this sense, are principles; descriptors are rules.

The reason this matters is not aesthetic. Detailed rules are attractive because they appear to offer certainty, but they assume the rule-maker can foresee every context in advance. Where practice is complex and varied – as it is across thousands of schools in very different communities – that assumption fails. Baldwin and Black argue that effective regulation must be “responsive” to the differing circumstances, behaviours and capacities of those it governs; rigid rules cannot do this, whereas principles can, because they delegate judgement to the professional on the ground.⁶ A standard works precisely because it does not try to do the thinking in advance. It sets the direction and trusts capable professionals to navigate.

⁴ Department for Education (2011). *Teachers' standards*.

⁵ Black, J (2008) 'Forms and paradoxes of principles-based regulation'. *LSE Law, Society and Economy Working Papers* 13/2008. London School of Economics and Political Science.

⁶ Baldwin, R and Black, J (2008) 'Really responsive regulation', *Modern Law Review*, 71(1), pp. 59–94.



The same logic explains why mature education systems treat teaching standards as stable reference points rather than annual instructions. An OECD comparative study of standards across school systems found that, internationally, professional standards function best as enduring statements of expected practice that frame development and accountability over time, not as frequently rewritten specifications (CEPPE, 2013).⁷ The remainder of this paper draws on what other sectors have learned about the difference.

⁷ Centre of Study for Policies and Practices in Education (2013). 'Learning Standards, Teaching Standards and Standards for School Principals: A Comparative Study.' *OECD Education Working Papers No. 99*. OECD Publishing.



3. Standards versus descriptors

A descriptor answers the question: what does the Government want from trusts right now? A standard answers a different question: what is a good trust, in any era? Both are legitimate questions, and a healthy system needs answers to both. The error is to conflate them — to take the changeable answer to the first question and dress it as the enduring answer to the second. The table below sets out the distinction.

| Dimension | A standard | A descriptor |
|---------------------------------|--|--|
| Question it answers | What does good look like, enduringly? | What is the priority right now? |
| Altitude | High-level principle | Granular specification |
| Stability | Perennial; changed rarely and deliberately | Time-bound; changes with priorities |
| Source of authority | Co-owned by profession and government | Set by government |
| Relationship to politics | Insulated from the electoral cycle | Reflects the government of the day |
| Primary function | Shared language of quality | Compliance and commissioning lever |
| Behavioural effect | Supports professional judgement | Invites tick-box / creative compliance |
| Examples | Teachers' standards; GMC Good medical practice; Nolan principles | Annual or multi-year priorities; commissioning criteria; targets |

To be clear, descriptors are not the enemy. A system needs a way to express what matters most right now, to signal that, this year, inclusion or financial resilience or attendance demands particular attention. That is a legitimate and necessary function. The argument of this paper is not that descriptors should be abolished, but that they should be named honestly and kept in their proper place: as a changeable layer of priorities and guidance sitting separately to the standards, not as the standards themselves. Problems arise only when the two are merged, so that the changeable is given the authority and permanence of the enduring.

4. How good standards function: evidence from other sectors

4.1 Teaching: a deliberately stable baseline

The *Teachers' standards* were the product of an independent review chaired by Sally Coates.⁸ The review deliberately produced a small set of generic standards, designed as a clear baseline applicable to all teachers regardless of phase or subject, and stable over time. It rejected proliferation and context-specific detail. The standards have remained substantively unchanged since – a stability that is a feature, not a defect. They function as a shared professional language and a baseline for entry, appraisal and conduct; they are not a vehicle for transmitting each year's ministerial priorities. That is precisely why they have endured across changes of government.

Two design choices made by the review are worth drawing out, because they translate directly to trust standards. First, brevity was deliberate: a short set of standards is easier to internalise, harder to game, and less likely to date than a long checklist. Second, the standards describe the professional, not the task. They articulate what a good teacher does and is, in terms that survive changes in curriculum, pedagogy and policy. A good trust standard would do the same: describe what a good trust is, in terms that survive changes in the political weather.

4.2 Medicine: a living standard, refreshed rarely

The General Medical Council's *Good medical practice* is the foundational standard for the medical profession.⁹ It is explicitly principle-based, organised around enduring duties and domains — knowledge and skills; patients, partnerships and communication; colleagues, culture and safety; trust and professionalism. It is owned by an independent professional regulator, not by ministers. And it is revised rarely and deliberately: the 2024 edition replaced the 2013 edition, an interval of eleven years. When it is revised, the purpose and architecture endure; the refresh updates emphasis – for example on digital professionalism and raising concerns – but it does not rewrite what a good doctor is. This is the model of a living standard: stable in purpose, periodically refreshed in expression.

4.3 Other professions: the same pattern recurs

The pattern is consistent across the professions. The Nursing and Midwifery Council's *The code* organises nursing standards around four enduring themes: prioritise people, practise effectively, preserve safety, and promote professionalism and trust.¹⁰ The Engineering Council's UK-SPEC sets out competence and commitment standards that hold across every engineering discipline.¹¹

⁸ Coates, S (2011) *First Report of the Independent Review of Teachers' Standards*. Department for Education.

⁹ General Medical Council (2024) *Good medical practice*.

¹⁰ Nursing and Midwifery Council (2018) *The code: Professional standards of practice and behaviour for nurses, midwives and nursing associates*.

¹¹ Engineering Council (2020) *UK-SPEC: UK standard for professional engineering competence and commitment*.



In each case the standard is generic, profession-owned and durable. None is rewritten to track the priorities of the government of the day.

4.4 Accounting and audit: the analytical heart of the argument

The clearest account of why this matters comes from financial regulation, where the choice between principles-based and rules-based standards has been debated for decades. Principles-based standards (the tradition of International Financial Reporting Standards) state the objective that accounts must give a “true and fair view” and rely on professional judgement to apply it. Rules-based standards (associated with US GAAP) specify detailed, bright-line tests. The literature documents a consistent finding: highly detailed rules invite “creative compliance”, in which firms satisfy the letter of the rule while defeating its purpose, and a tick-box mentality that displaces judgement. Schipper observes that standards often begin as a principle and are then eroded by accumulating bright lines, exceptions and detailed guidance – a drift from standard towards descriptor.¹² The most serious corporate-reporting failures of recent decades turned not on broken rules but on rules followed to the letter while their purpose was defeated: the signature of a culture in which detailed compliance has displaced principled judgement.

The lesson for trust standards is direct: the more a “standard” is specified as detailed descriptors, the more it invites compliance behaviour rather than genuine quality. A trust busy evidencing itself against forty descriptors is not necessarily a better trust; it may simply be a better-documented one.

4.5 Public life: insulation from ministerial direction

The *Seven principles of public life* (selflessness, integrity, objectivity, accountability, openness, honesty and leadership) were set out by the Nolan Committee in 1995.¹³ Three decades later they are unchanged and are embedded in codes of conduct across the public sector, including in schools. They demonstrate that it is possible – indeed normal – for a set of standards in public life to be stable, non-partisan and explicitly insulated from the priorities of the government of the day. No minister owns the Nolan Principles; that is precisely their strength.

¹² Schipper, K (2003) ‘Principles-based accounting standards’, *Accounting Horizons*, 17(1), pp. 61–72.

¹³ Committee on Standards in Public Life (1995) *First report of the committee on standards in public life*. HMSO.



5. Why the distinction matters for trusts

If priority-driven descriptors are labelled as standards and attached to commissioning and inspection, four risks follow.

- **Instability.** Priorities change with ministers and with governments. A “standard” built from current priorities becomes a moving target, requiring trusts to re-orient repeatedly rather than build sustained capacity.
- **Politicisation and lost legitimacy.** A standard owned by the government of the day is vulnerable to being read as a partisan instrument. Its authority depends on being seen as above the electoral cycle — exactly what the Nolan Principles and Good Medical Practice achieve.
- **Gaming and tick-box compliance.** As the accounting evidence shows, the more prescriptive the specification, the stronger the pull towards creative compliance — meeting the letter while missing the purpose.
- **Inspection volatility.** Because Ofsted is to inspect trusts in relation to these standards, any instability or improper formulation in the standards is transmitted directly into high-stakes accountability.

A worked illustration makes the point. Consider the themes trailed for the trust standards. Inclusion, value for money, and community collaboration are framed in the language of the current government’s programme. A future government might foreground different words, for example autonomy, specialisation, parental choice. If the standards are written at the level of these themes as priorities, any change of policy emphasis requires a rewrite, and trusts chase a moving target.

If, instead, the standards are written as enduring principles – that a good trust ensures every child can access and succeed in a high-quality education; that a good trust is a responsible steward of public money; that a good trust works with others in the interests of children beyond its own gates – then the same standard accommodates shifting emphasis without being rewritten. The priorities can then live where they belong: in guidance, frameworks, and improvement priorities that sit beneath the standards and can change as needed.

This layered approach is not a way of avoiding accountability; it is what makes accountability coherent. Trusts can be held to enduring standards of what good looks like and, separately, asked to respond to the priorities of the moment, with each understood for what it is. Conflating the two does the opposite: it makes the permanent feel provisional and the provisional feel permanent, and leaves no fixed point from which improvement can be measured. A standard that changes every few years cannot perform the one function a standard exists to perform: to be the thing that does not move.



6. Design principles for genuine trust standards

We offer six design principles. They are drawn directly from how durable standards function in the professions and sectors above, and are intended to help the government get this right.

- **Principle, not prescription.** Write the standards at the altitude of enduring purpose, stating what a good trust is for and trusting professional judgement to apply it in context.
- **Perennial and stable.** Design them to last ten to fifteen years. The test: would each standard still read as right under a different government?
- **Generic and universal.** Make them applicable to every trust regardless of size, phase or context — as the *Teachers' standards* are to every teacher.
- **Co-owned with the profession.** Develop and curate them with the sector, with arms-length custodianship modelled on the independent professional regulators in medicine, nursing and engineering.
- **Separated from commissioning and short-term priorities.** Keep the layers distinct: the standards define what good is; commissioning criteria, improvement priorities and guidance carry the changeable detail beneath them.
- **Reviewed rarely, transparently and independently.** Set a defined, infrequent review cycle — for example once a decade, as with *Good medical practice* — with independent input, not annual revision.



7. Conclusion and recommendations

CST welcomes the commitment to develop trust standards. The opportunity is real: a stable, principle-based articulation of what a good trust is for would serve children, trusts and government alike, and would endure. The risk is equally real: that priority-driven descriptors are labelled standards, wired into commissioning and inspection, and rewritten with each change of ministerial direction. The experience of teaching, medicine, the wider professions, financial regulation and public life all point the same way. We recommend that the Department:

- adopt the word and the substance, ensuring the trust standards are genuine standards, not descriptors;
- write them as a small number of enduring, principle-based statements of what good looks like;
- establish independent, sector-involved custodianship and a defined, infrequent review cycle;
- keep current priorities in a separate, explicitly changeable layer beneath the standards; and
- ensure that any inspection use rests on the stable standard, not on shifting descriptors.

Standards endure because they say something true about quality that does not change with the political weather. That is what the sector needs the trust standards to be.





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