Thinking about accountability, education and SEND

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Introduction

Accountability systems are powerful. If designed and implemented successfully, they can be forceful drivers of improvement; if poorly, there can be perverse incentives, reduced effectiveness and demoralised professionals. The purpose of this paper is to introduce a framework through which we can analyse accountability structures and SEND, and through which we can explore the weaknesses and strengths of current policy approaches, specifically in the English schools system. It does not seek to present an intricate description of accountability structures and indicators in the SEND field; nor does it explore in depth important contextual variables such as the level of education (preschool, primary, secondary, tertiary).

The paper has three parts. The first section explores the concept of accountability, its different purposes, and its potentially powerful effect on behaviours. Section two identifies multiple accountability regimes within the English schools system and their relevance to pupils with SEND; it considers why accountability for pupils with SEND may be ineffective, and proposes three remedies. The final section sketches out principles for designing a rigorous and practical accountability system for SEND.

1.   What is accountability?

Accountability has been described as a 'magic concept' – fashionable, attractive, generally accepted, but lacking clarity as a technical or operational term [1]. It is a concept that all can agree on in the abstract, but that becomes contested and difficult when enacted in practice.   Yet accountability mechanisms can be powerful systems of meaning and control that have real impact. This section identifies key dimensions of the idea of accountability, different possible purposes, and, significantly, the ability of accountability mechanisms to change behaviour; where possible, examples are taken from the education field.

Dimensions of accountability

A relationship. Accountability implies a relationship between two parties or more – in its simplest form, one party questions and the other answers with an account. There is typically some notion of responsibility, so that one party is held responsible by the other for their actions [2]; there is an implication that one party holds rights of authority over the other – at least to demand answers and possibly to impose sanctions [3]. This view, however, can be criticised for its emphasis on control and

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[1] Pollitt, C. and Hupe, P. (2011). "Talking About Government: the role of magic concepts." *Public Management Review* 13(5): 641–658.

[2] Edwards, M .and Hulme, D. (1996). ''Too Close for Comfort? The Impact of Official Aid on Nongovernmental Organizations.'' *World Development* 24(6): 961–73

[3] Mulgan, R. (2000). "'Accountability': an ever-expanding concept?" *Public Administration* 78(3): 555–573

power; accountability can be understood too as a more participative and less adversarial exchange, a suggestion that may have resonance in a field such as education.

Giving an account: at the heart of accountability is the provision of an account. An account may be presented as a narrative or as quantitative data; this collation of information for scrutiny is, in principle, an act of transparency[4]. The information provided may be accompanied by justification and explanation of decisions made and outcomes achieved.[5]

Evaluation: an account is rarely a simple description of what has taken place. When we hold someone accountable, we tend to evaluate their behaviours and achievements. This opens up a large area of contest and controversy in the education context. How do we make judgements of value? What outcomes do we value? What indicators do we use to measure them? Given the power of accountability frameworks, there is a fundamental question – who has the right to determine what is valued in an education system?[6]

Sanctions. Accountability systems may include the application of sanctions if the account or the reported actions are considered inadequate[7]. Such sanctions, both implicit and explicit, are a central feature in the education field, as discussed below.

Moral content. Beyond formal systems of sanction and incentive, there is arguably a moral and professional duty on education professionals to be open, responsive and accountable in their interactions with children, parents[8] and other stakeholders.

Purposes of accountability

Holding responsible. A first purpose of accountability systems is to hold individuals and organisations responsible: as Brian Lamb proposes in the SEND field, "where standards fall short, they will be challenged."[9] As Lamb's words imply, accountability contains some idea of 'rectification' or making good, should there be some failure in the account[10].

Incentive and constraint. 'Making good' can be interpreted in different ways. Individuals and organisations can be held responsible through sanctions or rewards – for instance, capability proceedings or performance-related pay for individual teachers. As well as holding the actor to account in the present, the possibility of such 'making good' creates incentives and constraints on future actions by other actors, so that the system becomes one of control.

Service improvement: more positively, 'making good' can be conceived as improving services that have been found wanting. Accountability can support service improvement through the generation of information flows: the collection of data about what is and is not working; benchmarking and comparative data; and the sharing of accounts of success and failure. Here accountability has a formative function.

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[4] Weisband, E. and Ebrahim, A. (2007). "Introduction: forging global accountabilities" in Ebrahim, A. and Weisband, E. (eds), *Global Accountabilities: Participation, Pluralism, and Public Ethics*. CUP: Cambridge.
[5] Weisband and Ebrahim (2007).
[6] Ball, S. (2003). "The teacher's soul and the terrors of performativity." *Journal of Education Policy* 18(2): 215-228
[7] Mulgan (2000)
[8] "Parents" is used throughout as a shorthand for children's parents and primary carers.
[9] Lamb Inquiry (2009). *Special educational needs and parental confidence*. Nottingham: DCFS. P.70
[10] Mulgan (2000): p.556.

Control and signalling by policymakers. Accountability mechanisms are used by policymakers to indicate priorities. As an example, the introduction of the EBacc accountability measure in school performance tables has pushed schools to prioritise particular subjects within the curriculum; inspection by Ofsted of schools' instruction in 'British Values' has directed schools' behaviours.

Building confidence: accountability mechanisms may support confidence in schools or the education system through transparency and reassurance of standards. On the other hand, strong accountability systems, especially if taking a top-down compliance approach, can be potentially corrosive, implying "institutionalised distrust" in professionals' competence and motivations.[11]

Empowerment and dialogue. Accountability systems can empower parents and children by providing transparent information about educational performance. Such empowerment may be enhanced where there is opportunity for stakeholders to engage in meaningful dialogue with schools and other education institutions[12].

These purposes of accountability can be in tension. Most obviously, the emphasis on holding actors responsible, and the associated threat of sanctions, may encourage a culture of compliance and a reluctance to admit failures, both of which mitigate against service improvement; to achieve constructive commitment to improvement it may be necessary to detach formative accountability from accountability associated with external sanctions[13]. Top-down control and signalling is in principle at odds with stakeholder empowerment and dialogue. Finally, accountability and transparency do not necessarily develop trust, but may raise distrust if the emphasis is continually on what has failed.

Accountability and behaviour

Accountability systems can be powerful structures of meaning, signalling, incentive and constraint which cause significant changes in the behaviour of those held accountable. Responses may be consistent with those intended. But there is widespread evidence of unintended effects, especially when there are significant consequences for actors should measurable standards not be met. There has been concern at 'gaming' – deliberate actions that subvert or circumvent the purpose of an accountability measure. An example would be disproportionate focus on the attainment of pupils on the historic C/D boundary in GCSE examinations in order to improve league table ranking at the expense of other non-measured outcomes.

There may also be crowding out of activities that are not measured. Public examinations may encourage schools to 'teach to the test', thus reducing attention to other non-measured educational opportunities[14]. The EBacc indicator, which holds schools to account for pupils' achievement in specified core academic subjects, has been found to reduce schools' focus on physical education[15].

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[11] Power, M. (1997). *The Audit Society: Rituals of Verification*. Oxford: Oxford University Press. P.135

[12] West, A., Mattei, P. and Roberts, J. (2011). "Accountability and Sanctions in English Schools." *British Journal of Educational Studies* 59(1): 41-62

[13] See, for instance, the discussion of formative testing in Dorn, S. (2010). "The Political Dilemmas of Formative Assessment." *Exceptional Children* 76(3): 325-337.

[14] For instance, Ward, G. and Quennerstedt, M. (2019). "Curiosity killed by SATs: an investigation of mathematics lessons within an English primary school." *Education 3-13* 47(3): 261-276

[15] Maguire, M., Gewirtz, S., Towers, E. & Neumann, E. (2019). "Policy, contextual matters and unintended outcomes: the English Baccalaureate (EBacc) and its impact on physical education in English secondary schools." *Sport, Education and Society* 24(6): 558-569

2. Accountability regimes and SEND in the English schools system

We turn now to the accountability regimes within the English schools system and their relevance to pupils with SEND. Seven types of accountability mechanism have been identified by Anne West and colleagues[16]:

Hierarchical: schools are held accountable by local authorities (in the case of maintained schools), by Regional Schools Commissioners, by the state inspection agency Ofsted and by the Department for Education (DfE). Accountability measures include exam performance data, attendance data, financial management, safeguarding and the Ofsted inspection framework. Sanctions for poor performance are potentially severe: the jobs of teachers and senior staff may be under threat; the governing body can be replaced; poor inspection grades can reduce enrolment and long-term sustainability; maintained schools can be forced to become academies.

Market: parents as consumers exercise market accountability by choice of school and by moving school when unhappy. Market accountability is informed by school league tables, Ofsted reports and online school profiles. The sanction is a falling roll which constrains the financial resources available to the school and may even undermine its viability.

Contractual: academies are accountable through contracts with the Secretary of State for Education, mediated by the Education Skills and Funding Agency (ESFA) and by Regional Schools Commissioners. Sanctions include closure of academies through termination of contract, or enforced transfer of an academy from one multi-academy trust to another[17].

Legal: schools have multiple legal duties, such as employment law, data protection, and human rights legalisation. It is through the legal system that schools and local government are frequently held to account in the SEND field through mechanisms such as the SEND Tribunal. Potential sanctions vary widely depending on the specific legal issue, extending to civil fines and criminal convictions for individuals and organisations.

Professional: teachers are subject to professional expectations and norms of conduct; they are accountable to their peers for appropriate behaviour. More recently central government in England has overseen professional conduct through the Teaching Regulation Agency (TRA). Sanctions, with the exception of actions around gross misconduct by the TRA, are peer disapproval and shame.

Participative: participative accountability is characterised by dialogue, questioning and discussion. In the schools system this is embodied by the governing body, within which parents, staff and community representatives come together to hold school leaders to account. Parent-teacher meetings also fall within this framework, as do children's voice mechanisms such as school councils. With the rise of the multi-academy trust, there is some concern at the reduced role for local school governing bodies, and hence a decline in participative accountability mechanisms[18]. Inasmuch as

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[16] For further discussion, see West et al. (2011).

[17] 118 such transfers took place between 2017-2019: Department for Education (2019). *Academy Transfers and Funding in England.*
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/818404/Official_Statistics_Publication_Academy_Transfers_and_Funding_Finalv3.pdf

[18] West, A. and Wolfe, D. (2019). "Academies, autonomy, equality and democratic accountability: Reforming the fragmented publicly funded school system in England." *London Review of Education* 17(1): 70–86.

governing boards also sit within the hierarchical accountability regime, there is the possibility of sanctions applied to senior staff. But there are few sanctions directly associated with participative accountability.

Network: in the emerging environment of school partnerships and peer-to-peer school support, there is growing attention to the notion of network accountability. This may refer both to accountability of a partnership to wider external actors, and also to the accountability of members of the partnership to each other. The latter may be characterised by dialogue, peer review and expectations of professional behaviour. Formal sanctions may be weak, but powerful normative sanctions are associated with peer monitoring and professional approval.

How do schools and teachers negotiate these multiple accountability regimes? One proposition is that schools will align their behaviours with those accountability mechanisms for which sanctions are both severe and likely to be enforced, as set out in Table 1. Such an analysis predicts that hierarchical, market and legal accountability regimes are likely to be most salient for schools and therefore influence behaviours. Network, participative and professional accountability regimes will be relatively less important.

Table 1 Accountability regimes - salience of sanctions[19]

		Perceived strength of sanction	
		Strong	**Weak**
Perceived likelihood of sanctions	**Likely**	Market Legal Hierarchical	
	Unlikely	Contractual	Network Participative Professional

Accountability regimes and SEND

How does accountability for SEND provision fit within these regimes? There are two problems. First, SEND provision is not adequately represented within the most salient accountability regimes: it may lack prominence; even if accorded some significance, its complexity and diversity is not fully captured. Let us consider each of the prominent regimes – market, hierarchy and the law. Market accountability assumes parents' ability to choose between schools; but for parents of children with SEND, and especially more complex needs, the lack of accessible alternatives undermines choice and

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[19] Based on West et al. (2011): table 2, p.55.

hence the power of market accountability. The hierarchical accountability regime does increasingly make reference to SEND. It is through such accounts that we have data on failures of provision around SEND – whether in terms of attendance and exclusions, weak provision at school and local area level as described by Ofsted, or academic attainment that lags behind children who do not have SEND. There is then a descriptive account[20]. The account, however, is incomplete: academic attainment, although of importance to many children with SEND, is only one part of effective provision, and the emphasis on quantifiable attainment data may cause neglect of other important practice. There is the further central concern about whether such accounts move beyond description to action, so that schools and other actors are pushed to improve provision. Significant indicators, and sanctions associated with them, may give little prominence to children with SEND relative to their peers, or alternatively create perverse incentives for gaming so that schools may even seek to avoid offering provision to some children with SEND. The legal accountability regime, finally, does at least place some prominence on SEND. However, sanctions in this field of law are arguably insufficient to deter poor behaviour. Further, resort to this accountability system is costly to parents and their children; it is also inequitable, favouring parents with financial and cultural capital who can negotiate the legal system.

The second problem arising from the analysis of schools accountability regimes is this: particular styles of accountability that may have an especial utility in supporting effective provision for pupils with SEN do not have sufficient purchase. As noted, network and participative forms of accountability may be deemed less relevant because of the absence of associated incentives and sanctions. The dialogue, questioning and learning implied within such accountability processes is likely to contribute to service improvement in all fields of education; but they are especially fundamental in the SEND field because of its complexity and diversity, because much may hinge on the presentation of difficulties at the level of the individual student which requires explorative dialogue between professionals, child and parents, and because inter-agency and inter-school collaboration are central to provision and improvement.

Re-balancing accountability structures towards SEND: three propositions

How might we enhance the importance and power of accountability for SEND, in order to push forward improvement in SEND provision? Three propositions are advanced here.

1. *Increase the salience of SEND as integral dimension within the most influential accountability systems*. Rob Webster, for instance, proposes not only an Ofsted SEND grade for schools, but also that a school's overall grade cannot be any higher than this grade[21]. Such a mechanism raises the importance of SEND by explicitly connecting it to significant reputational and other sanctions within the hierarchical accountability system. Personal budgets for SEND provision within an EHC plan might empower parents within the market

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[20] Descriptive accounts are yet necessarily robust: Ofsted inspection, for instance, may not accurately capture the effectiveness of SEND provision. See Peacey, N., Lindsay, G., Brown, P. and Russell, A. (2009). *Increasing Parents' Confidence in the Special Educational Needs System: Study Commissioned to Inform the Lamb Inquiry.* University of Warwick / Institute of Education, London
https://warwick.ac.uk/fac/soc/cedar/projects/completed2010/lambinquiry/report_v4.pdf

[21] Webster, R. (2019). "Looking Forward: Using the Warnock Report to chart a way forward" in R. Webster (ed.) *Including Children and Young People with Special Educational Needs and Disabilities in Learning and Life*. Abingdon: Routledge.

accountability mechanism[22]; but the force of this mechanism will remain weak as long as there is limited availability of SEND provision.

2. *Tiered accountability*. West and colleagues note a conundrum that the top-down hierarchical accountability system, in the form of Ofsted inspection, assesses the effectiveness of the participative system – for instance in terms of schools' community involvement[23]. Schools are thus held to account within one accountability regime for their effectiveness in implementing a contrasting regime. Such tiered accountability might be constructively exploited to raise the salience of systems of accountability that, while valuable for the effectiveness of SEND provision, tend to be deemed less relevant in the absence of incentives and sanctions. As an example, schools might be evaluated by Ofsted on the extent to which they enable space for dialogue, so that the lived experience of parents and children are given centrality in decision-making (participative accountability); local authorities can be evaluated upon their oversight of partnership working (network accountability). There are two assumptions here, both challengeable: that incorporation within the hierarchical system raises the salience of participative and network accountability; and that such incorporation does not corrode such accountabilities, for instance by encouraging only superficial treatment.

3. *Design constructive interactions between accountability regimes.* Thoughtful design of systems can enable complementarity between accountability regimes. The London Challenge programme is an example. Figure 1 presents accountability flows within the schools support component of the programme. Underperforming schools were supported under contract by consultant headteachers from more successful schools[24]. This relationship between consultant headteachers and their colleagues has been described as one of support rather than accountability[25]; more accurately it was a professional peer-to-peer accountability regime, creating powerful normative motivations and obligations, and also offering the space for professional dialogue and autonomy for local, context-driven solutions[26]. Relationships were brokered by the London Challenge's core team of advisers, which undertook quality assurance of the school-to-school support, offered guidance and disseminated good practice - a set of functions that can be described as complex network accountability. The core team in turn reported to DfE civil servants and the Minister for London Schools – a hierarchical accountability characterised both by rigorous interrogation

[22] Children and Families Act 2014.

[23] West et al. (2011)

[24] Ogden, V. (2012). *Making Sense of Policy in London Secondary Education: What Can Be Learned from the London Challenge?* EdD. Thesis. Institute of Education, University of London. https://discovery.ucl.ac.uk/id/eprint/10020696/1/__d6_Shared$_SUPP_Library_User%20Services_Circulation_Inter-Library%20Loans_IOE%20ETHOS_ETHOS%20digitised%20by%20ILL_OGDEN,%20V.J.pdf

[25] Ofsted (2010). *London Challenge*. https://webarchive.nationalarchives.gov.uk/20141105213955/https://www.ofsted.gov.uk/sites/default/files/documents/surveys-and-good-practice/l/London%20Challenge.pdf

[26] Kidson, M. and Norris, E. (2014*). Implementing the London Challenge*. Joseph Rowntree Foundation / Institute for Government. https://www.instituteforgovernment.org.uk/sites/default/files/publications/Implementing%20the%20London%20Challenge%20-%20final_0.pdf; Rudd, P., Poet, H., Featherstone, G., Lamont, E., Durbin, B., Bergeron, C., Bramley, G., Kettlewell, K. & Hart, R. (2011) *Evaluation of City Challenge leadership strategies: overview report*. Slough: NFER; Ogden (2012).

of performance data and by dialogue[27]. Finally, as a sharp focal point, supported schools remained accountable under the standard hierarchical regimes of Ofsted inspection and evaluation of performance data, with strong sanctions possible, including school closure. The constructive interaction of accountability systems is not simple, and can depend on the quality of systems leadership. But it is not implausible to propose a similar design, tailored to the specific context of SEND provision and perhaps on a regional basis, that draws out the mutual strengths of accountability regimes.

Figure 1: Combining accountability mechanisms: school-to-school support within the London Challenge
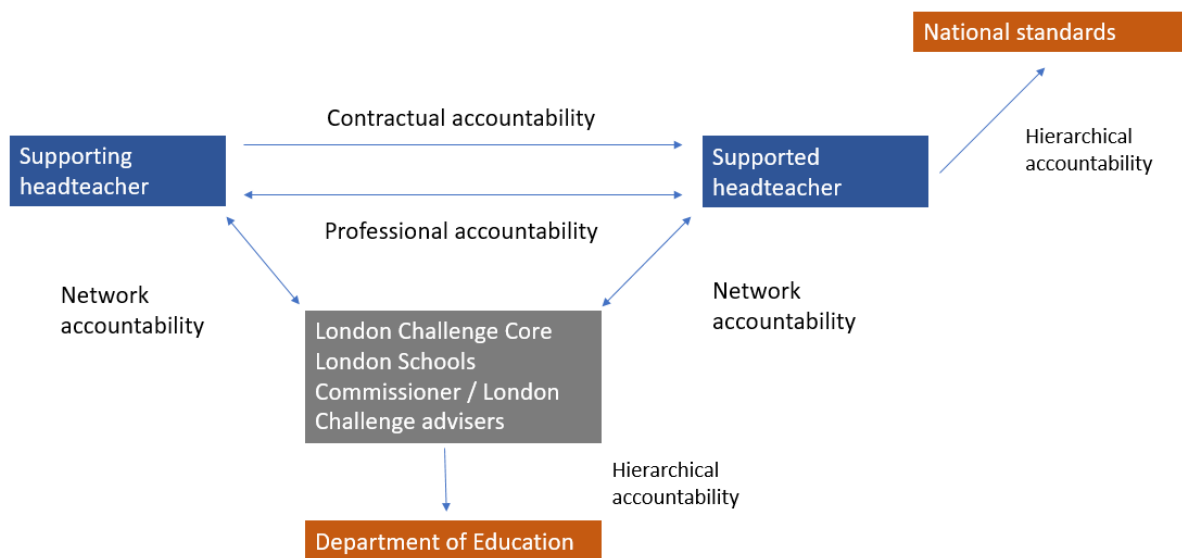
3. Accountability for SEND provision: its implementation

This final section sketches out principles for designing a rigorous and practical accountability system for SEND. It identifies the importance of an initial determination of the theory of justice and educational purpose as the foundation for the accountability system, before briefly exploring evaluation approaches and implementation challenges.

What is our conception of the public good in education?

Accountability mechanisms and measures are not neutral, but infused with moral choices. What we measure and how we measure it carries assumptions about how we understand the public good – even if those assumptions are unstated and unexamined. There is a temptation to move swiftly to intervention, measurement and holding to account without fully interrogating those assumptions.

Within the field of SEND and education more broadly, there are two fundamental considerations. First, what is our conception of a good society? Education is intimately linked with theories of justice – in terms of access to education, provision for the disadvantaged or oppressed, or equality of opportunity. Measurement systems can be influenced by, or representative of, such theories of

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[27] Kidson and Norris (2014)

justice. Let us consider, as an example, two contrasting theories: utilitarianism, which in a classical rendering defines the good society as that which supports the greatest good for the greatest number[28]; and a 'capabilities approach', which demands that every individual should be enabled to acquire the necessary set of capabilities to pursue a life worthy of human dignity[29]. These conceptions of justice imply very different accountability measures in education and around SEND. The Progress 8 GCSE measure, for instance, tends in its current form towards a utilitarian approach: a unit of progress for a student who is already attaining highly is evaluated as equivalent to that of a unit of progress for a child with SEND whose attainment is low; further, because the achievement of a unit of progress for a student with SEND may require more resources and expertise, and because this challenge is not adequately captured within value-added mechanisms[30], schools will receive more credit if they concentrate resources away from children with SEND. According to a utilitarian perspective such an outcome is not necessarily unacceptable, since it may improve the well-being of the greatest number of young people to the greatest extent. A capabilities approach to Progress 8 would, however, weight more heavily the progress of those pupils who have not yet achieved sufficient capabilities to lead a dignified and autonomous life – in other words, the most vulnerable, of whom a significant subset would be likely to have SEND. Similarly the proposal that a school's overall Ofsted grade can be no higher than its grade for SEND provision is consistent with the capabilities approach: through such a condition effective support for the most vulnerable becomes essential rather than peripheral.

The second consideration, which may in turn be partially determined by our answer to the first, is - what is the purpose of education? It is beyond the scope of this paper to engage in any detail in this contested area. As a single example Gert Biesta has identified three functions[31]: first, *qualification* – knowledge, skills and understanding for job, life and civic involvement, within which might lie academic attainment and some aspects of personal development; second, *socialisation* – the transmission of norms and values within communities; and third, *subjectification* – the development of "autonomous and independent [individuals] in … thinking and action"[32]. There are complex considerations which must inform the design of accountability systems: are these purposes or others most appropriate for pupils with SEND? What of the well-being of parents and carers too? What is the relative priority to be given to each? How can such purposes be operationalised into meaningful objectives and valid measures?

Evaluating for accountability

Accountability implies evaluation of what has been done well or less well. Robust evaluation of impact is challenging, especially in the multidimensional and dynamic environment of schools and communities. The diversity of needs and circumstances in the population of young people with SEND further implies complexity in evaluation and the need for flexible approaches.

There is a considerable volume of academic and practitioner literature on impact evaluation. Three observations are briefly made here. First, evaluation tools that provide *quantitative data*, if

[28] Bentham, J. (1776/1891). *A Fragment on Government*. Oxford.
[29] Nussbaum, M. (2011). *Creating Capabilities*. Cambridge, MA: Harvard University Press.
[30] Leckie, G. and Goldstein, H. (2019). "The Importance of Adjusting for Pupil Background in School Value-added Models: A Study of Progress 8 and School Accountability in England." *British Educational Research Journal* 45(3): 518-37.
[31] Biesta, G. (2009). "Good education in an age of measurement: on the need to reconnect with the question of purpose in education." *Educational Assessment, Evaluation and Accountability* 21(1): 33-46.
[32] Biesta (2009): p.41

rigorously designed and implemented, are valuable for enabling benchmarking and comparison, and thus professional and organisational learning. Typically such quantitative measures have been focused upon academic achievement and rates of attendance at school; emerging techniques enable broader and more sophisticated quantitative insights around mental health and happiness.

Quantitative approaches cannot, however, fully capture significant data about the experiences of young people with SEND and their families which can inform accountability and service improvement. The second observation is therefore the need to use *qualitative approaches and narratives* to capture intangible and uncountable phenomena, such as young people's voices, their individual trajectories of personal and academic development through their education career, and schools' culture of learning and culture of respect towards young people with SEND.

Finally, there is value in *evaluating process* as well as impact, where there is evidence that particular processes are likely to contribute to effective provision, and where impacts themselves are hard to measure. Examples of processes for evaluation include inter-agency partnership working, the use of evidence-based practice, and the integration of provision for pupils with SEND into the school curriculum. The move from fine-grained interrogation of internal school data towards inspection of "the quality of education" within the new Ofsted framework can be construed as a shift towards such process evaluation[33]. Evaluating administrative process is important too, such as the number of children with SEND waiting for a school place, the timeliness of issuing EHC plans or waiting times for statutory assessment – all of which can affect outcomes as well as causing distress to families.

A hazard of process evaluation is the development of a static institutionalised view of effective practice, whether among professionals or within inspection authorities. Such a development might reduce innovation and impinge upon professional creativity and responsiveness to local context; there is an especial concern that standardisation, whether of outcome or process indicators, is inappropriate given the diversity of children who have SEND[34].

Accountability in practice

Accountability regimes must, like any policy intervention, be practical. In this final section three practical challenges of implementation are briefly introduced.

First, do those held to account perceive the system to be fair? A perception of being judged or sanctioned unfairly is likely to be unsettling and demotivating. Fairness within the schools accountability system has multiple dimensions: evaluation must be perceived as accurate and justifiable; those held to account must perceive that they have the power and resources to affect those items for which they are held accountable (this perception of power becomes particularly challenging when actors are held accountable for partnership working with individuals or organisations over whom they have no direct authority); and sanctions related to the accountability regime must be perceived to be proportionate.

A second challenge is the danger of accountability proliferation. There is an understandable desire for accountability systems to be as complete and as nuanced as possible, and in some sense that argument is supported here in the call for mechanisms to reflect the complexity and diversity of the experience of children with SEND. But the consequence can be a growing number of accountability

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[33] Ofsted (2019). *School inspection handbook (May 2019)*.

[34] Vignoles, A. (2015). "Special Educational Needs." In Cassen, R., McNally, S., and Vignoles, A. (eds) *Making a difference in education : What the evidence says*. Abingdon: Routledge.

requirements and escalating demands for detail, with disproportionate impacts upon professionals' workload.

Third, and linked to the requirements for fairness and accuracy, do those who hold education professionals to account have sufficient skills, understanding and knowledge? Neither school governors nor Ofsted inspectors necessarily have appropriate capabilities[35]. Without governors who both understand SEND provision and have the confidence to challenge school leaders, accountability, through the mechanism of the governing body at least, will not be effective[36].

Accountability in education is not simple. The variety of stakeholders, the breadth of relationships and the multidimensionality of outcomes create extraordinary challenges in designing robust accountability regimes. This paper has introduced the accountability regimes in the English schools system; it has set out some reasons why accountability for provision for pupils with SEND might not yet be sufficiently incisive and has proposed remedies; it has set out principles for the design and implementation of accountability systems in the SEND field. Throughout a central question recurs: do accountability mechanisms lead to learning, and from learning to service improvement? Accountability systems, especially for children with SEND, must move beyond the description of problems and the implementation of sanctions to constructive action.

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[35] Peacey et al. (2009)
[36] Lamb Inquiry (2009)