

Sixth Form Colleges Association: response to Ofsted's education inspection framework consultation

Proposals

Framework proposals

These proposals represent an important evolution of current inspection arrangements. The new framework aims to focus inspection judgements and the criteria that underpin them on the quality of education that providers offer. The sections that follow illustrate how we propose to do this.

Proposal 1

We propose the introduction of a new 'quality of education' judgement built around our working definition of the curriculum. It will focus on a provider's educational intent, implementation and impact. Inspectors look at teaching, assessment, attainment and progress under the current inspection framework, and they will continue to do so, but these considerations will contribute, viewed in the context of the provider's curriculum, to a single quality of education judgement. In short, we propose to take a holistic approach to considering the quality of education rather than artificially separating the leadership of the curriculum from teaching, and separating teaching and the use of assessment from the impact this has on the outcomes that learners achieve. This will de-intensify the inspection focus on performance data and place more emphasis on the substance of education and what matters most to learners and practitioners.

To what extent do you agree or disagree with the proposal to introduce a 'quality of education' judgement?

Strongly agree <input type="checkbox"/>	Agree <input checked="" type="checkbox"/>	Neither agree nor disagree <input type="checkbox"/>	Disagree <input type="checkbox"/>	Strongly disagree <input type="checkbox"/>	Don't know <input type="checkbox"/>
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Comments:

This is a welcome proposal. There is widespread support for de-intensifying the inspection focus on performance data and placing more emphasis on the substance of education. It is the implementation of this proposal, rather than the proposal itself, that requires further development. The shift in focus from data to the substance of education will require a mindset change – both for inspection teams and for some colleges. It will inevitably introduce a greater degree of subjectivity into the inspection process and will lead to grades that are not reflected in the performance data that will continue to be used by parents, students and other stakeholders.

This is a price worth paying if inspection teams will truly make decisions based on 'the substance of education' that considers the wider context in which a college operates, and the background of its students. Ofsted should guard against mandating what good pedagogy or subjects look like, and instead provide clear instructions to inspection teams to engage in meaningful dialogue with colleges before, during and after inspection. There is an opportunity with this new proposal and framework to move towards a more collaborative model of inspection.

Ofsted's risk assessment process will continue to be primarily data driven. Making a decision to inspect a college based on its data, and then conducting an inspection where data is not a primary concern, has the potential to cause a degree of confusion. The intention is no doubt for performance data to contribute to, rather than drive, the overall judgement. But it is not clear what the relative weighting of the quality of education and other three judgements will be. Some clarity here would be welcome.

And while the move away from a data-driven inspection model is one that we broadly welcome, it remains the case that grade descriptors that include terms such as 'consistently strong' are likely to be interpreted in very different ways by different inspectors. Colleges should also not be penalised for using data to inform proportionate target setting, tracking and monitoring in a context where students are engaged in understanding their progress – this model has been hugely successful in a large number of sixth form colleges.

These are all reasons for Ofsted to invest heavily in the training and development of the inspection workforce ahead of the introduction of the new framework. A particular priority here should be training for Ofsted Inspectors. HMIs will receive comprehensive training and will inspect on the new framework on a regular basis. As OIs will not receive the same level of training, or inspect as often, it is possible they may fall back on old practices, particularly in the period immediately after the launch of the new framework.

Proposal 2

We propose to judge 'personal development' separately from 'behaviour and attitudes' to enhance the inspection focus on each and enable clearer reporting on both. This approach recognises the very different elements in focus. We believe that the behaviour and the attitudes learners of all ages bring to learning is best evaluated and judged separately from the provision made to promote learners' wider personal development, character and resilience.

To what extent do you agree or disagree with the proposed separation of inspection judgements about learners' personal development and learners' behaviour and attitudes?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: We agree with this proposal. Some members were sceptical that personal development could be disentangled from behaviour and attitudes, but overall, this was regarded as a sensible proposal. The deep cuts to 16-19 funding since 2010 alongside the increasingly complex needs of students mean that almost all colleges have been forced to make deep cuts to non-qualification activities. These include enrichment activities such as music, sport and educational visits and support activities related to mental health, employability and careers advice.

SFCA's recent [funding impact survey](#) on behalf of the Raise the Rate campaign found that 81% of schools and colleges strongly disagreed or disagreed that the amount of 16-19 funding they will be allocated in 2019/20 will be sufficient to provide students with meaningful opportunities for personal growth.

Further education and skills

The further education and skills sector is broad and diverse, with providers that deliver a wide range of education and training provision in different settings. We have drafted the proposed education inspection framework and handbook to be adaptable for all the types of provider that we inspect.

Under the common inspection framework, we currently inspect all publicly funded provision. We grade, and report specifically on, six different types of education and training provision:

- 16–19 study programmes
- adult learning programmes
- apprenticeships

- traineeships
- provision for learners with high needs
- full-time provision for 14–16 year olds.

Proposal 9

We believe that it would make our inspections and reports more coherent and inclusive if we were to reduce the types of provision that we grade and specifically report on as follows:

Proposed education inspection framework types of provision	Current types of provision
Education programmes for young people	16–19 study programmes, including: <ul style="list-style-type: none"> ■ academic, technical and vocational study programmes ■ study programmes for those with education, health and care plans, aged 16 to 24 (and those with high needs) ■ 16–19 traineeships ■ full-time provision for 14–16 year olds.
Apprenticeships	Apprenticeships at levels 2 to 5, whether frameworks and standards, levy or non-levy funded.
Adult learning programmes	Adult learning programmes 19–24 traineeships.

We will cover education and training for people with SEND and/or high needs thoroughly and appropriately within the relevant type of provision rather than separately. We consider that this will ensure that they are fully and properly represented and not marginalised or isolated within the inspection and report.

T-levels, a major reform of technical education at level 3, will be introduced from September 2020. That will take place after the beginning of this new framework. We intend to review how we should best integrate the coverage of T-levels into this framework closer to the time of their introduction and will consult further on this in due course.

To what extent do you agree or disagree that the proposal to reduce the types of provision we grade and specifically report on will make our inspection reports more coherent and inclusive?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: *If you disagree, are there any specific areas you are concerned about?* 16 to 19 study programmes are what our members specialise in. The new framework provides an opportunity to align the definition and content of a 16 to 19 study programme with that used in the DfE's funding guidance, particularly around issues such as work experience. But in general terms, continuing to align the proposed FE and Skills handbook with the school inspection framework is a welcome move.

Our main concern is that the inspection of 16 to 19 study programmes in schools and academies is still far too light touch. In a two day inspection of a school with a large sixth form, 16 to 19 provision will inevitably face far less scrutiny than it will in a sixth form college during a four or five day inspection. Colleges also have their Quality Achievement Rates scrutinised before and during inspections but QAR data is not produced for schools.

So while we agree with the proposal to reduce the types of *provision* that are graded, we remain concerned that it is still not possible for parents and prospective students to make meaningful comparisons between types of *provider*. The best way to remedy this is to ensure that school sixth forms and sixth form colleges are inspected in the same way, using the same data. Serious consideration should also be given to including an FE and skills inspector on every inspection of a school sixth form, particularly those with a significant number of students.

Finally, it is worth noting that sixth form colleges have become increasingly focused on 16 to 19 provision in recent years. One reason for this is that colleges that deliver small amounts of apprenticeship or adult provision have sometimes felt there has been a disproportionate focus on these areas during inspection. So while it makes sense to report on the three types of provision set out in the consultation it is important that judgements about minority provision do not have a disproportionate impact on the grade for overall effectiveness.

Proposal 10

Under the current common inspection framework, Ofsted carries out short inspections of most good further education and skills providers. This happens within five years of the previous inspection. Some good providers instead receive a full inspection for reasons of risk. We intend to continue with short inspections for most good providers on the same basis. However, given greater focus on the quality of education in the education inspection framework 2019, we believe we need to change the way we carry out the short inspection of good providers in some respects.

Under our current methodology, we undertake to confirm that a provider remains good by exploring a number of lines of enquiry that differ for each provider. As we are introducing a new inspection framework with a focus on the quality of education and the curriculum, we propose introducing an approach that focuses on the quality of education and training, safeguarding and effective management, and that this

should be the same for all providers. We are continuing to pilot our proposed approach. The proposed areas we are piloting are:

- Is the quality of education/training good?
- Has the provider addressed the areas for improvement/next steps identified in the last inspection report well?
- Are the provider’s safeguarding arrangements effective?
- Are careers education and guidance of a good quality?
- Has the provider managed and implemented changes to provision effectively since the last inspection?

We will refine the above areas based on our pilot activity and from feedback following this consultation. In order to ensure that short inspections are planned effectively with providers, and to ensure coverage, we are proposing to increase the time the lead inspector, or in the case of larger providers, the lead inspector and another member of the inspection team, spend on site. We propose that the lead inspector, or in larger providers, two inspectors, arrive at the provider on the day following notification and complete the planning for the inspection on site with the provider (see paragraphs 126-133 of the draft further education and skills inspection handbook). They would then start inspection activity prior to the full inspection team arriving the following day.

To what extent do you agree or disagree with the proposed model for short inspections?

Strongly agree <input type="checkbox"/>	Agree <input checked="" type="checkbox"/>	Neither agree nor disagree <input type="checkbox"/>	Disagree <input type="checkbox"/>	Strongly disagree <input type="checkbox"/>	Don't know <input type="checkbox"/>
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Comments: The move towards a standard focus for all providers is welcome. The current 'lines of enquiry' model has its limitations – the focus can be too narrow and in some cases the lines of enquiry are not actually the most important areas to pursue. Having the lead arrive on day one has the potential to help engender the more collaborative model of inspection mentioned in our response to proposal 1.

Proposal 11

We are proposing to extend the timescale within which we should inspect providers judged to require improvement from 'normally 12 to 24 months' after the last inspection to 'normally 12 to 30 months' after the last inspection. This will provide greater flexibility to give providers more of an opportunity to improve to good while still allowing some providers to be re-inspected earlier if they are ready for it. A provider that has been judged as requires improvement would continue to receive a monitoring visit between inspections.

To what extent do you agree or disagree that the timescale within which providers that are judged to require improvement receive their next full inspection should be extended from '12 to 24 months' to '12 to 30' months'?

Strongly agree <input type="checkbox"/>	Agree <input checked="" type="checkbox"/>	Neither agree nor disagree <input type="checkbox"/>	Disagree <input type="checkbox"/>	Strongly disagree <input type="checkbox"/>	Don't know <input type="checkbox"/>
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Comments: This will allow colleges more time to make the changes necessary to being judged good or outstanding. A return to a 'support and challenge' model for colleges judged to require improvement would also be very welcome. This model was well received by the sector and colleges welcomed the collaborative nature of the visits.

Inspection of colleges at campus level

Ofsted has, for some time, intended to introduce grading and reporting on individual colleges within college groups as part of the overall inspection of the college group, subject to receiving the funding to be able to do this.

Since the disaggregated data that will make it possible to determine what provision is delivered by which college will not be fully available until 2021, it will not be possible to introduce that for the beginning of this framework. We will therefore consult further on this in due course. We will, in the meantime, look at ways in which we can better differentiate the relative performance of individual colleges within inspection reports of college groups.

Please use this box to record any additional comments in relation to the detail set out in the further education and skills draft inspection handbook.

In the background to the consultation document it states that *"Your feedback will help us refine and improve our proposed approach."* As with the quality of education grade, it is largely in the *implementation* of Ofsted's proposals that we believe these refinements and improvements should be made. We broadly agree with the proposed framework and share many of the principles that underpin them.

However, we do have a specific concern about the inclusion of workload issues. On page 40 of the draft handbook, reference is made to how assessment can drive up teacher workload. In the background document, reference is made to how *"the production, collection and analysis of data can create additional workload for staff and leaders."* However, elsewhere in the document, more general references are made to workload, without any link to the (no doubt well intentioned) aim of reducing bureaucracy in assessment and data collection.

Given that (for example) 81% of school sixth forms and colleges have had to [increase class sizes](#) as a result of funding pressures, there is a concern that institutions could be penalised because of external factors that are almost entirely out of their control. [Recent research from London Economics](#) found that since 2010, the number of students in sixth form colleges has increased by 6.5%, but the number of teaching staff has declined by 15%. This reduction in the teacher workforce has resulted in a 28% increase in the average learner-to-teaching staff ratio across the sector (from 18:1 to 23:1). We believe that references to general *'workload issues'* in the framework and handbook could be misinterpreted and should be removed.

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