Department for Education Consultation: Performance reporting for FE college groups and multi-site colleges

Response from the Sixth Form Colleges Association

Question 1: Do you agree that these are the right policy objectives?

Yes, although we need a world class education system, not just a world class *technical* education system.

Question 2: Do you agree that for all groups, performance should be reported at college level as well as at group level?

Yes, this is a sensible proposal. It would bring greater transparency to the performance of distinct (usually independent and autonomous) institutions that form part of a group structure. At present, students, parents and other stakeholders cannot form an accurate view of performance because data is aggregated at group level and is not available at institution level. This does not happen in the schools world (with Multi Academy Trusts for example) and should not happen in the college world.

Question 2: Do you agree that for all groups, performance should be reported at college level as well as at group level?

Yes

Question 3: Is the proposed approach to defining a college for the purposes of separate performance reporting sufficiently clear to be applied consistently in practice?   Are there other factors that should also be taken into consideration?

Yes. The example of distinct institutions having *their own learner-facing identities, their own websites and/or prospectuses* is useful.

Question 4: Do you agree that separate performance reporting should not apply to college sub-brands, where these are clearly part a single college?

Yes

Question 5: What impact might separate reporting for colleges that are part of groups have on decisions by corporations on how they are organised, and what might the unintended consequences be?

Corporations should welcome the greater transparency this will bring. In some cases the outstanding performing of individual institutions is masked by the overall performance of a larger group.

Question 6: Do you agree that for an initial period there should be constraints on the ability of corporations to change their college identities, other than in exceptional circumstances?

No, it would not be right to impose restrictions on something as fundamental as a college's identity, certainly not in order to aid the implementation of a change to performance reporting.

Question 7: Do you agree that in addition to our proposals for separate performance reporting for colleges that are part of groups, some form of performance reporting for delivery sites within multi-site colleges should also be introduced?

No. The group proposal is straightforward to understand and would be relatively straightforward to implement. It would increase transparency and aid accountability. The same is not true of the multi-site proposal that could lead to a range of unintended consequences.

Question 8: Of the suggested options for delivery site reporting, are there any that you think should be ruled out?

All of them. If a college has (as set out in the group proposal) *a single learner-facing identity, brand or name, viewed by learners as distinct, with its own prospectus and/or website* then performance should be reported as a single institution. The fact that this single institution might

have separate delivery sites is irrelevant, and can often simply reflect the nature of a college's estate. Option A is the most absurd, as it would result in performance being reported based on the building that provision is delivered in. For example, one college in the South West has twelve 'campuses' in the same city. Reporting individually on each of these delivery sites would increase, but by no means improve, the information available to learners.

This could be addressed by Option C - separate performance reporting for some delivery sites, based on geographical distance or travel time. But distance and travel time can be measured in different ways and a policy underpinned by one or both of these measures is likely to be something of a blunt instrument.

Bureaucracy is a problem with all of the options proposed. Catering for peaks and troughs in student numbers (Option B) or the changing nature of curriculum (Option D) would require officials to set and then monitor a series of rules, probably on annual basis. It is not unusual for students to be taught at more than one site, which would make it very difficult to set a reporting threshold that was meaningful.

Colleges are independent, autonomous decisions and if they take the decision to (say) move provision from one site to another, they should not have to factor in the implications of performance reporting if the decision is the right one for students.

Question 9: Of the suggested options for delivery site reporting, which option or combination of options do you think would be the best overall approach?

N/A

Question 10: If separate performance reporting for delivery sites was to be introduced based on number of learners (Option B), what do you think the minimum number of learners should be?

N/A

Question 11: If separate performance reporting for delivery sites was to be introduced based on geographical distance what do you think the minimum distance threshold should be? Should it be 5km, 10km, or 15km – and how should that distance be calculated?

N/A

Question 12: Do you have any other suggested options for performance reporting for delivery sites within multi-site colleges?

Introducing performance reporting at site level could unravel some of the structural changes that have been introduced through the area reviews. Some colleges have merged in line with the policy aspiration for larger, more resilient institutions. This has introduced economies of scale and the flexibility for staff to be deployed across multiple sites in an institution with *a single learner-facing identity, brand or name, viewed by learners as distinct, with its own prospectus and/or website.*

A move to multi-site reporting could reverse some of these advantages and force colleges to re-employ staff (for quality purposes in particular) at site level. A lot of the hard work that has gone in to create a single college vision, mission and ethos post-merger could be undermined by reporting at delivery site level. And it would also reintroduce a degree of competition between sites that are part of the same institution – something that would re-ignite some of the tensions that the area reviews set out to address.

A further concern will be that where performance reporting leads, Ofsted will follow. This will disappoint colleges that merged with the understanding they would be treated as a single entity and will act as a disincentive for some colleges when considering a merger in the future. It will also hinder the Department's ambitions for 'system leadership' that, in its purest form, requires institutions to join together as one entity and to be treated as such for accountability, performance and inspection purposes.

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