

# Responses to Ofsted's consultation on changes to the framework for inspecting residential accommodation in further education colleges

A report on the responses to the consultation

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## Introduction

1. This report outlines the response to Ofsted's consultation on a revised inspection framework for inspecting residential accommodation of students under 18 years in further education colleges. It shows our findings from the consultation and how this informs the way we propose to inspect such provision from 1 January 2015.
2. The inspection of residential accommodation in colleges seeks to establish the extent to which residential colleges meet the national minimum standards, *Accommodation of students under eighteen by further education colleges: national minimum standards, inspection regulations*.<sup>1</sup>
3. The national minimum standards (NMS) are intended as a blueprint to safeguard and promote the welfare of young people under 18 where their accommodation is provided or arranged by a further education (FE) college.
4. The NMS have remained unchanged since 2002 when they were introduced and are overseen by the Department of Business, Innovation and Skills (BIS).
5. The inspection of the education and training provision at FE colleges is carried out in accordance with the *Common Inspection Framework for the inspection of further education and skills* (CIF) under separate statutory arrangements.<sup>2</sup>
6. In 2012, Her Majesty's Chief Inspector, Sir Michael Wilshaw announced a number of radical changes to the inspection of education provision. His message 'only good is good enough' made clear that Ofsted expects all schools and further education providers to be at least 'good'.<sup>3</sup> This announcement heralded the introduction of the 'requires improvement' inspection judgement and implementation of improvement support and challenge for schools, colleges and training providers.
7. Ofsted is determined to continue to promote improvement in all the provision it inspects and regulates. It seemed appropriate to consider whether the inspection of residential accommodation in further education colleges would benefit from the same revisions as for inspections of the education and training provision in colleges.

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<sup>1</sup>*Accommodation of students under eighteen by further education colleges: national minimum standards, inspection regulations*; Department of Health 2002:  
[http://webarchive.nationalarchives.gov.uk/+www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH\\_4005629](http://webarchive.nationalarchives.gov.uk/+www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_4005629)

<sup>2</sup>*Common inspection framework for further education and skills 2012* (120062), Ofsted 2014:  
[www.ofsted.gov.uk/resources/common-inspection-framework-for-further-education-and-skills-2012](http://www.ofsted.gov.uk/resources/common-inspection-framework-for-further-education-and-skills-2012)

<sup>3</sup>*A good education for all - key changes for further education and skills providers*, (120147), Ofsted 2012:  
[www.ofsted.gov.uk/resources/good-education-for-all-key-changes-for-further-education-and-skills-providers](http://www.ofsted.gov.uk/resources/good-education-for-all-key-changes-for-further-education-and-skills-providers)

8. Since 2013, all colleges and providers graded as requires improvement for their education and training provision have undergone support and challenge from Ofsted, including improvement visits, to help them improve to good.<sup>4</sup>
9. We have learnt many lessons from the support and challenge programme, which we want to use in the development of the new framework for inspection of residential colleges.
10. We want the new framework to be centred on the needs of students but also one that raises the expectation of residential colleges and promotes greater improvement of residential provision.

## **The consultation method**

11. We used a variety of methods to consult with a range of people. Our primary consultation method was an online survey open to the public from 6 May to 30 June 2014. This consultation asked participants quantitative questions and provided them with free text boxes to write their views.
12. We received 53 individual responses to the online consultation. This included responses from provider representative bodies, students, parents and carers and 19 residential colleges. We supported our online survey with face-to-face discussion groups with 28 students from three residential colleges and also carried out consultative pilot inspections with two residential colleges to explore and test the practicalities of our proposals.
13. We have carefully considered the responses to the online consultation and information gathered from the pilots and discussion groups with students in developing the revised inspection framework.
14. The results of the online consultation are available in 'Findings in full'.

## **Summary of findings**

15. We sought views on six specific proposals.
16. Overall, respondents to the consultation were supportive of our proposal to change the 'satisfactory' judgement to 'requires improvement' and welcomed its focus on placing a higher expectation on colleges to ensure '...they exceed and not only meet the national minimum standards'.
17. Respondents also favour the proposed refining of the grade descriptors as it would 'help clarify the steps needed to improve and achieve higher standards'. They reiterated, however, that there has to be a clear delineation of the

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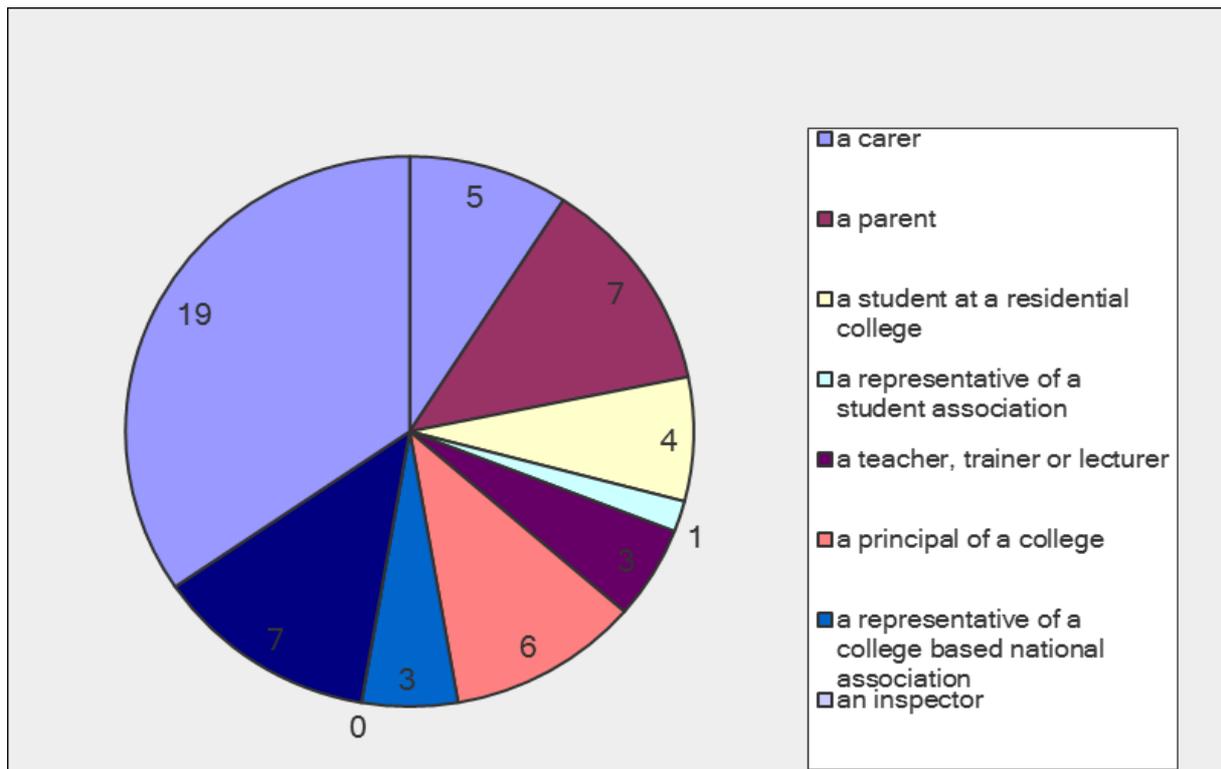
<sup>4</sup> *Support and challenge for further education and skills providers that require improvement to become good or outstanding* (130012), Ofsted 2014: [www.ofsted.gov.uk/resources/support-and-challenge-for-further-education-and-skills-providers](http://www.ofsted.gov.uk/resources/support-and-challenge-for-further-education-and-skills-providers)

characteristics that explain the respective descriptors and their alignment to whether colleges meet the NMS.

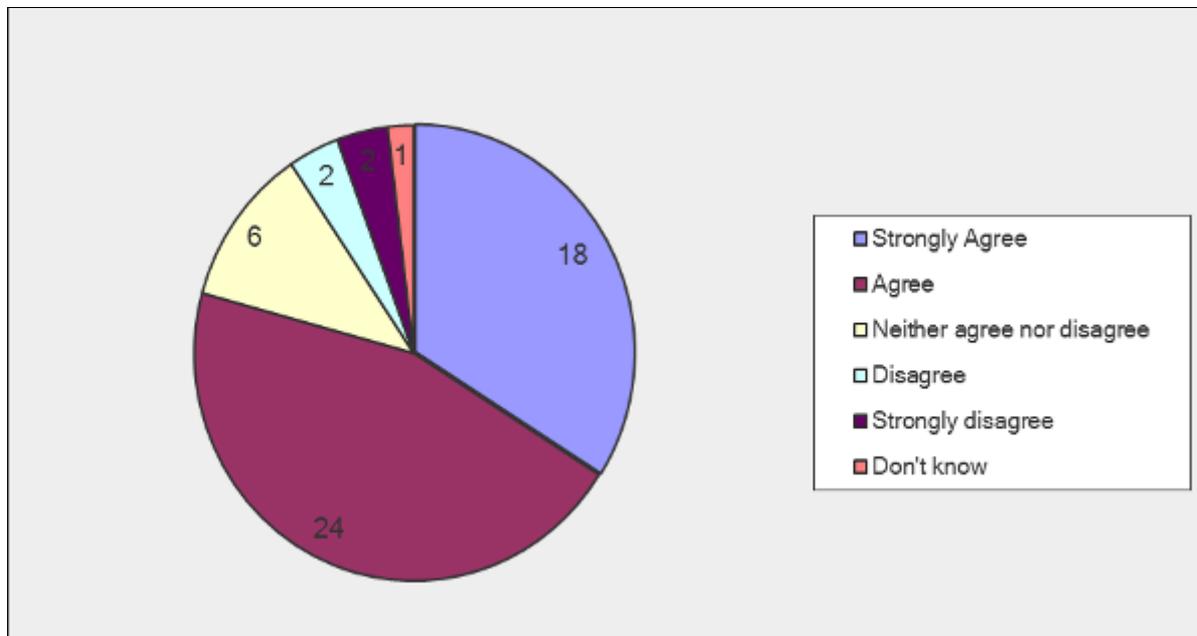
18. There was a strong mandate from respondents to link education, training and employment outcomes with the residential experience. Some respondents felt that these inspections are about the welfare of students and should be considered separately from the education, training and employment outcomes.
19. There was overwhelming support from respondents to our proposal to introduce improvement visits as this would bring residential colleges in line with other remits and help to raise standards.
20. Respondents endorsed our proposal to reinspect the residential provision of colleges whose residential provision is judged *requires improvement* or *inadequate* but would prefer a shorter timeframe for reinspection.
21. Respondents held mixed views about the proposal to introduce 'little or no notice' inspections with a variety of reasons cited why 'no notice' might not be practical and effective.

## Findings in full

22. We received 53 individual responses to the online consultation. This included responses from provider representative bodies, students, parents and carers and 19 residential colleges. We supported our online survey with face-to-face discussion groups with 28 students from three residential colleges and also carried out consultative pilot inspections with two residential colleges to explore and test the practicalities of our proposals.

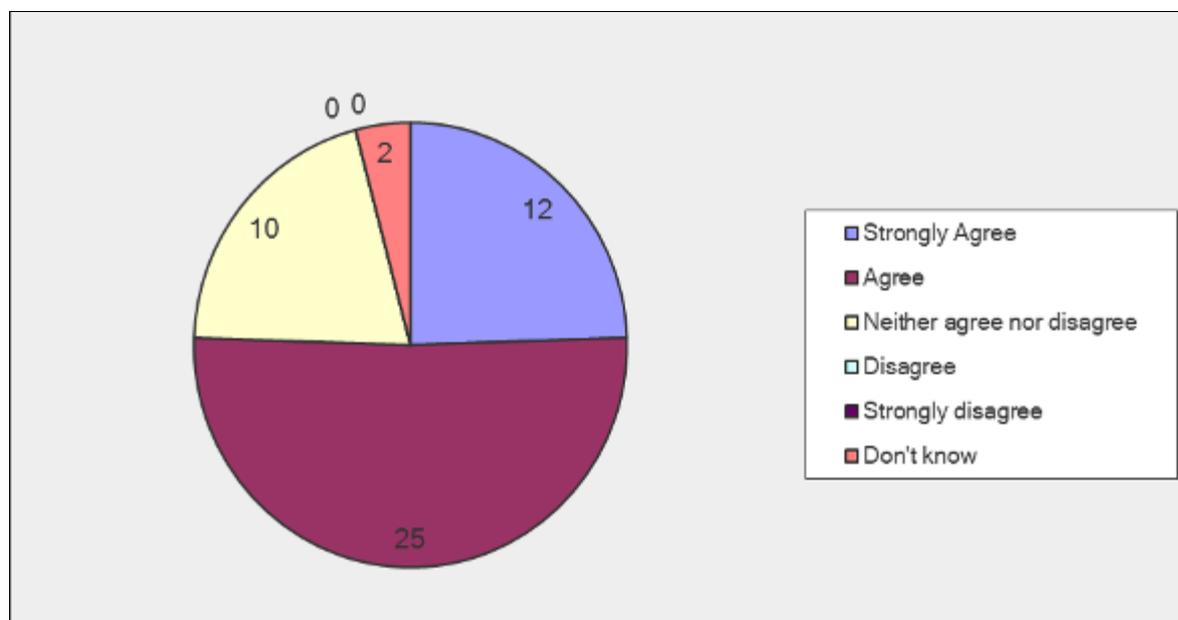


**Q1. To what extent do you agree or disagree that the grade 'adequate' should be replaced by 'requires improvement'?**



23. There was very clear support for our proposal to replace the adequate grade with 'requires improvement'. Of the 53 responses to the question, 42 strongly agreed or agreed with this proposal; four strongly disagreed or disagreed. Seven respondents had no strong opinion either way.
24. In the summary of the views expressed, one respondent remarked: 'this makes sense as it adds more value to the grades "good" and "outstanding". Another highlighted 'that adequate implies that the service is acceptable when only outstanding or good colleges should be regarded as delivering an acceptable service'.
25. Other commentators welcomed the consistency that this would bring with other inspection remits and the enhanced clarity that it would ensure for prospective students and practitioners.

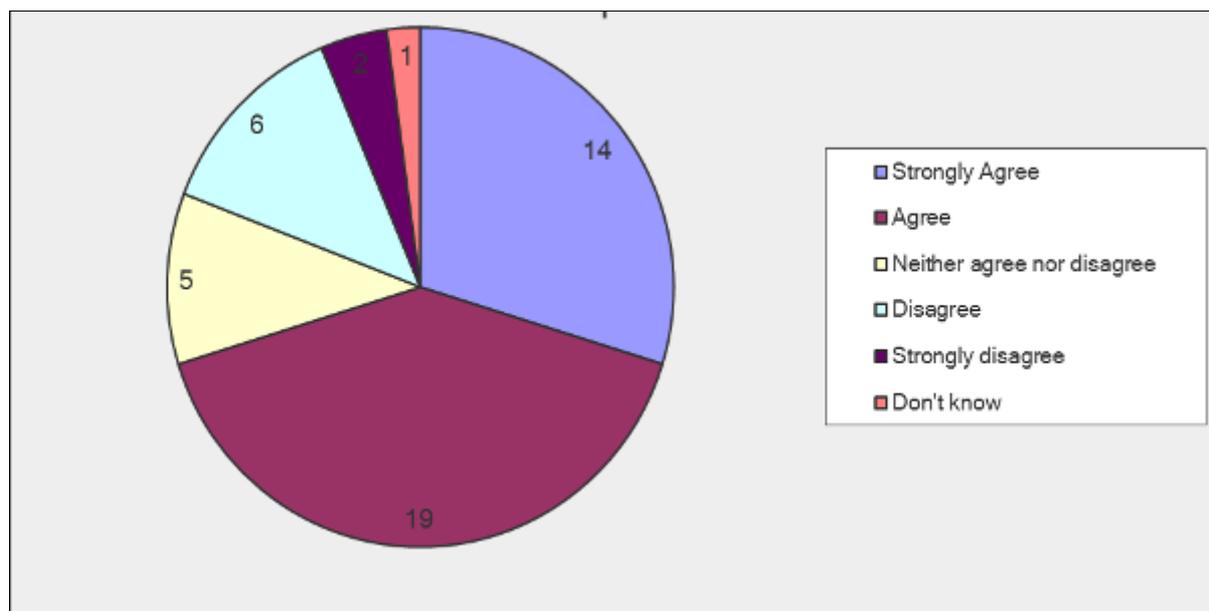
**Q2. To what extent do you agree or disagree that the grade descriptors and other guidance should be refined?**



26. There were 49 responses to this question. Thirty seven respondents either strongly agreed or agreed that the grade descriptors should be enhanced so that there is a really clear distinction between the criteria for the respective judgements and that distinguishes good from inadequate provision. Ten respondents neither agreed or disagreed with this proposal.
27. Respondents suggested that:
- it will 'help clarify the steps needed to improve and achieve higher standards'
  - the distinction between good and outstanding is often difficult to determine and clear descriptors would be helpful.
28. The young people who attended the discussion groups were very clear that the overall experience they have in residence makes a provision 'good' or 'outstanding'. One remarked that 'if you're just here and in your room, you're not going to have a good experience. It needs to be worth remembering and something you want to go back to, not be pleased when you've left'.
29. The young people felt that a good or outstanding college will:
- have excellent facilities and supportive staff
  - provide access to everything they need, including access to educational resources, all the time
  - provide a secure, safe, warm and homely ambience/environment that facilitates their independence and supports them to achieve their goals

- have a variety of activities for students to enjoy and develop personal and social skills.

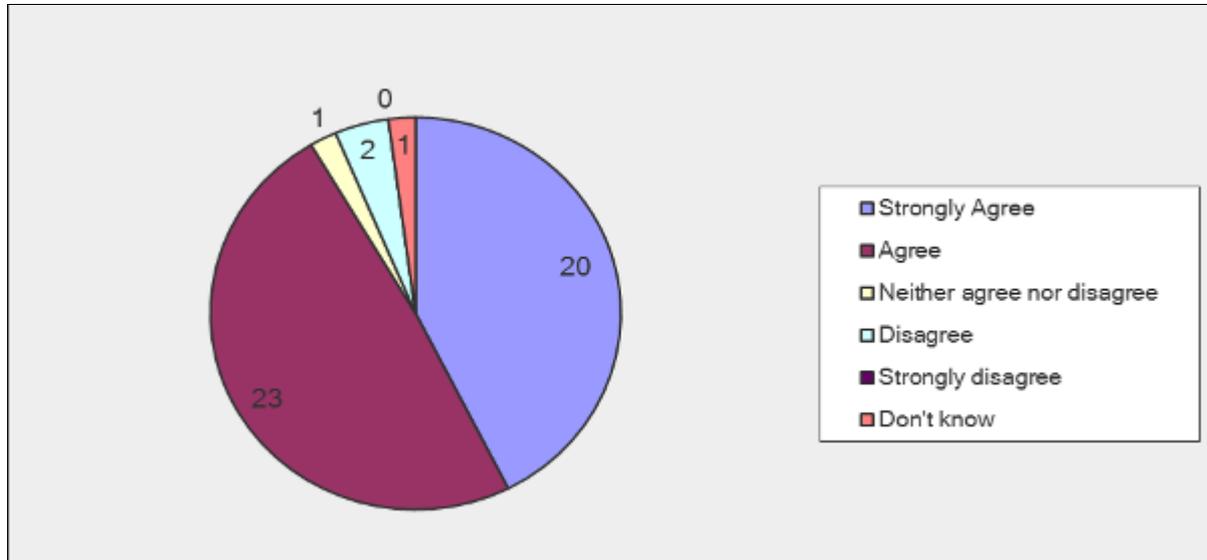
**Q3. To what extent do you agree or disagree that the education, training and employment outcomes of young people in accommodation should be taken into account as part of the outcomes for young people when inspecting their residential provision?**



30. Thirty three out of the 47 respondents to this question strongly agreed or agreed with the proposal to link the two different elements. As one principal put it, 'the impact of residential life on curriculum achievement is very important and should be measured to achieve positive outcomes'. Another respondent remarked that 'the residential element is an important component of the overall learning programme...'
31. Others commented:
- 'This is the main reason we offer the accommodation'
  - '...the college has an opportunity to take an holistic view of the learners experience whilst at the college'
  - 'In terms of college education, there is a fundamental link between welfare and educational attainment'.
32. Reservations were raised, however, by those who disagreed with the proposal and also by some who were broadly in agreement.
33. Few respondents and also one of the colleges involved in the consultative pilots raised concerns around the potential for cross-over between the residential and the education provision as two different inspectors could be looking at the same things and reach different judgements. Others noted that:

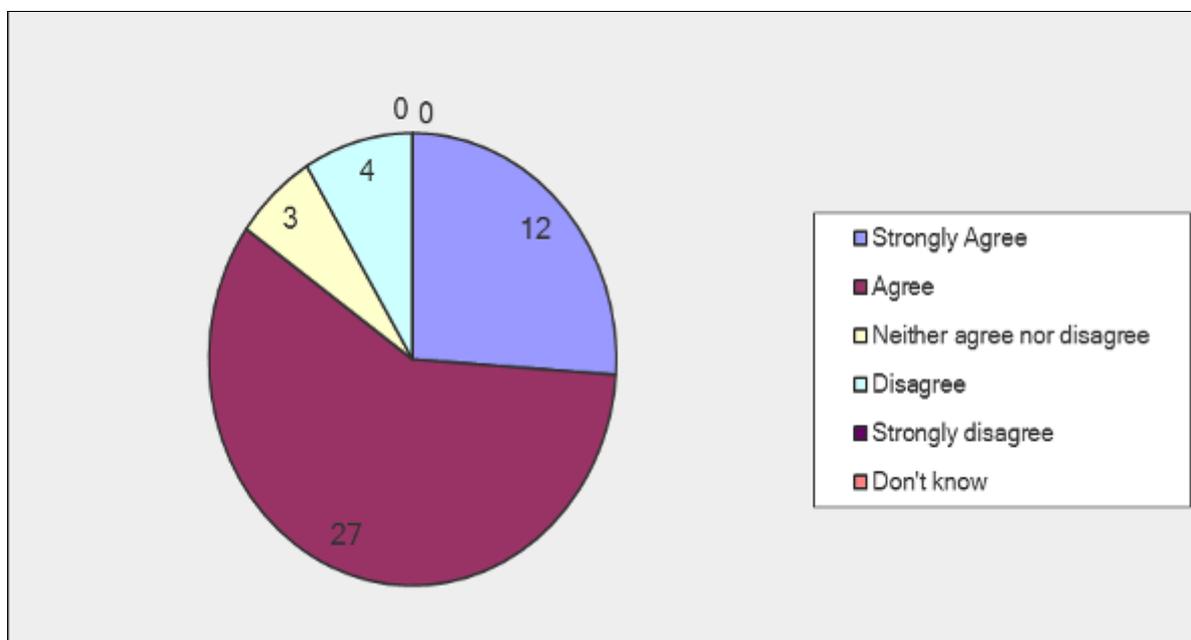
- students use residential accommodation for a number of reasons and although educational achievement cannot be ignored, it is not always the main reason
  - it is important to ensure that there is no duplication in the inspection of college residential provision and the inspection of the education and training of the same young people in colleges
  - we would expect a positive residential experience to improve educational achievement in the broadest sense but are not of the view that this should become the focus of the inspection where support, care and safeguarding should be the primary purpose
  - we would suggest that, while education inspections are structured around the overall success of the college, welfare inspectors should look specifically at the link between welfare and the individual student.
34. The young people who attended the discussion groups acknowledged the benefits of living at the college. These included having time to do their work without spending a lot of time travelling; having a secure and safe environment for them to achieve their goals and develop independence; having the opportunity to carry out routine duties in relation to animal welfare at unsocial hours and weekends; and moreover, having access to learning facilities outside of the academic day.
35. They emphasised that to do well in college they needed to be happy and relaxed in residence.

**Q4. To what extent do you agree or disagree that residential colleges judged as requires improvement or inadequate should be challenged to improve through improvement visits by inspectors?**



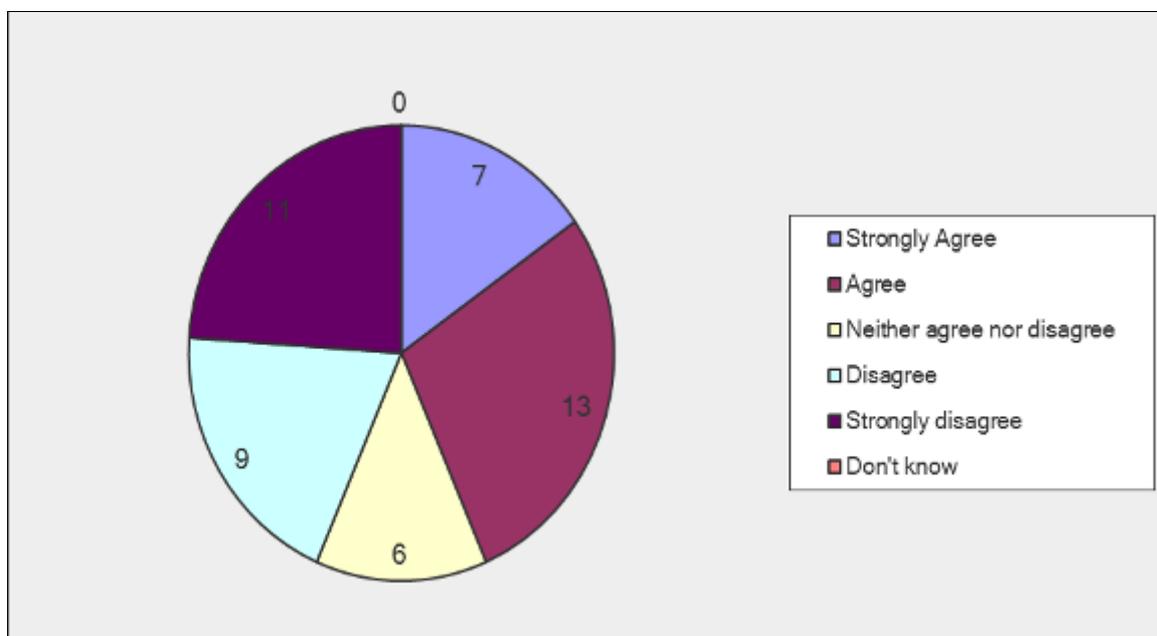
36. There was overwhelming agreement with this proposal. Forty three out of the 47 respondents to this question considered it wholly appropriate and a necessity for any college judged as *requires improvement* to receive additional monitoring and support. Most comments echoed the view that 'this is just as important for the residential aspects of a college as for other areas...' and 'this has to happen to raise the standards...'
37. There was similar support to this proposal from the students who attended the discussion groups. They felt that any college that needs to improve should be visited after a few weeks or once a term to support them in targeting and addressing things they need to do better. As one student put it, 'if they get a lower mark, they need to step up'.

**Q5. To what extent do you agree or disagree that a residential college judged as requires improvement or inadequate should be inspected again within two years of its previous inspection?**



38. This proposal to reinspect colleges judged as requires improvement or inadequate within two years was endorsed by 39 of the 46 respondents to this question. They acknowledged that ongoing support to colleges was vital to both raise standards and moreover protect the interests of students.
39. There was a consistent view, which was also shared by the students who attended the discussion groups, however, that reinspection two years after the initial findings was too long a period and the timeframe should be significantly shorter.
40. One respondent to the online consultation remarked that 'while it may not be possible to improve educational outcomes significantly in a short period, safeguarding and welfare standards can be'.
41. Respondents helpfully suggested that reinspection should be:
- risk-based with the timeframe being dictated by the nature of the improvements required
  - in six months for providers judged inadequate and 12 months or slightly longer for those judged requires improvement.

**Q6. To what extent do you agree or disagree that residential colleges should receive no, or very little, notice of inspection?**



42. There were mixed views in relation to this proposal. Of the 46 responses received, 20 respondents were in favour of the reduced notice while an equal number disagreed. Six respondents neither agreed nor disagreed with the proposal.
43. Respondents who disagreed and to some extent those who broadly agreed with the proposals, had shared concerns in relation to 'no notice'.
44. The concerns revolved around the practicalities of administering 'no notice' and how effective the approach would be in ensuring that inspectors reached sound judgements. Particularly, for instance, where key staff were absent, such as in colleges where staff work in shifts, or in cases where students and homestay providers were unavailable.
45. There was consensus, however, that 'no notice' would be appropriate 'in response to specific incidents or where safeguarding concerns exist'.
46. Respondents were slightly more relaxed about giving some notice. Suggesting it would help:
- remove the risk of key elements being overlooked on inspection by inspectors or the wrong judgements being made if staff who deliver the service are not present
  - ensure that inspectors have access to robust evidence on which to base their judgements
47. Views from the discussion groups with young people were largely in favour of giving 'no notice'. They would prefer that inspectors just turn up and see what

the college is like. One student suggested that 'more bad points would be seen if they (inspectors) just came'. Others felt that if notice is to be given, it should be no more than 24 hours because some aspects should be spontaneous while others would need preparing for.

## **The way forward**

48. We are very grateful to all those who responded to the online consultation, the young people who attended the discussion groups and the two colleges who agreed to be involved in the consultative pilots. The very valuable and insightful views and observations have assisted us in developing our inspection framework and associated inspection documents.
49. We set out below our decisions in relation to the six proposals that we have consulted on.
50. Where we have decided to implement any of the proposals these will take effect for inspections from January 2015.

## **Introduction of requires improvement judgement**

51. Given the support for this proposal, we will replace the 'adequate' inspection grade with 'requires improvement'. This change will apply to judgements of overall effectiveness, outcomes for young people, quality of service, safeguarding, and effectiveness of leadership and management.

## **Revising the grade descriptors**

52. While there is support for this proposal, respondents to the consultation have rightly reminded us of the importance of producing grade descriptors that give clear and unambiguous guidance about how inspection grades will be pitched. Respondents emphasised that guidance and judgement criteria must not only be sufficiently robust to help inspectors reach the appropriate judgements but also support colleges in developing their provision.
53. We understand these concerns and will ensure that there are clear definitions of the grade descriptors that will distinguish between good and outstanding, requires improvement and inadequate.

## **Linking the residential provision with the education, training and employment outcomes of young people**

54. Our intention to link the education provision with the residential provision was based on the premise that this would be a contributory and not a main factor in reaching inspection judgements about outcomes for young people.
55. With this in mind, we have modified the grade descriptors in the revised framework so that educational outcomes are taken into account as part of the consideration. So in a good college: 'Learners clearly benefit, both academically

and socially, from their residential environment.' And in an outstanding one, they 'achieve well at college and are very well prepared for the next stage of life after college, make successful transitions, are as independent as possible, and have sustained engagement in education, employment or training.'

### **Improvement proposals for residential colleges judged as requires improvement or inadequate**

56. There was a strong mandate from contributors to our consultation for inspectors to support and challenge colleges judged as requires improvement or inadequate to improve to become good.
57. From January 2015, we will therefore introduce improvement visits to colleges whose residential provision is judged to require improvement or is inadequate at inspection.
58. We will write further to all colleges to explain how the improvements visits will be carried out.

### **Reinspection proposals for residential colleges with provision judged as requires improvement or inadequate**

59. We welcome respondents' endorsement of this proposal but acknowledge their suggestions for having a shorter interval between the initial inspection and the reinspection.
60. The proposal to reinspect 'within two years' allows for an earlier reinspection where the evidence or information available dictates that it is necessary. The improvement visits covered in Q4 will provide a means to risk-assess whether the reinspection should be earlier or later.
61. We will continue to base the timing of the reinspection of residential provision in colleges on any known risks and the outcome of the previous inspection.

## **Changing the period of notification**

62. We have reflected on the concerns raised by respondents in relation to giving colleges 'no notice' of inspection. While we appreciate the general principle that colleges should be inspected with as little notice as possible so that they are seen as they would be on an everyday basis, we also consider that this should be balanced with the availability of key evidence, staff and students. Without this, inspectors may be placed in a position where they are not able to reach sound judgements that reflect the true character of a college.
  
63. We have found that half a day's notice, which applies to inspections of residential and boarding provision in schools (and to non-association independent school inspections generally) allows sufficient time to ensure contact with key staff and students and the preparation of key evidence. We therefore propose that from January 2015, inspections of residential colleges be carried out with notification of inspection at around 9am and with the inspection commencing at around midday. However, we reserve the right to inspect unannounced where we have serious concerns.