



OFFICE FOR STANDARDS  
IN EDUCATION

# Inspection Arrangements for Initial Teacher Training: 2002/03 Onwards

Report on the Consultation

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# Contents

<b>Introduction</b>	<b>3</b>
<b>Main Outcomes of the Consultation</b>	<b>5</b>
<b>The Way Forward</b>	<b>6</b>
<b>Question-by-question Analysis</b>	<b>6</b>

## Introduction

- 1 The consultation paper issued in July 2001 by the Office for Standards in Education (OFSTED) and the Teacher Training Agency (TTA) set out proposals designed to achieve a substantial reduction in the burden of inspection on Initial Teacher Training (ITT) providers whilst ensuring that inspection remains a spur to improve the quality of training from 2002/03 onwards.
- 2 The twelve main proposals were framed in the light of earlier discussions with stakeholders. These proposals were:
  - i. the inspection regime should differentiate between good and other provision
  - ii. over a six-year period, good provision should have one full and one short inspection; satisfactory provision should have a full inspection every three years; and borderline and non-compliant provision should have a further inspection within a year of that finding
  - iii. full inspections should focus on three aspects of provision: training quality, the standards achieved by trainees, and management and quality assurance
  - iv. short inspections should focus on management and quality assurance and, if these raise concerns, a full inspection should be undertaken in the subsequent year
  - v. secondary inspections should continue to focus on individual subjects but should also move increasingly towards providing an overview of the quality of provision in the secondary phase
  - vi. primary inspections should focus on the three core subjects and take account of preparation for the wider primary curriculum
  - vii. providers should be assessed on the extent to which they meet the secretary of state's requirements and enable trainees to meet the standards for Qualified Teacher Status (QTS)
  - viii. the four-point grading scale should be retained, but non-compliance should be treated separately from grade 4 which should be used for provision that may be compliant, but is judged by inspectors as unsatisfactory
  - ix. there should be an expectation that providers would carry out self-evaluations, the evidence from which will be available for inspectors to take into account
  - x. to make their assessments representative of overall quality, inspectors should sample the training and trainees' standards across all the routes to QTS offered in a secondary subject or primary provision
  - xi. the inspection methodology used where there are small numbers on secondary courses should be adapted to avoid the risk of the standards grade being distorted by the performance of one or two trainees
  - xii. the Teacher Training Agency should continue to define allocation categories solely in terms of inspection grades.

- 3 The 23 questions of the consultation were designed to assess the degree of support from ITT providers and other stakeholders for these proposals, to gauge reaction to the options set out, and to generate comments which would be of value in: shaping the revision of the *Framework for the Assessment of Quality in Initial Teacher Training*; drafting the associated guidance on inspection methodology; and informing the use of inspection evidence by the TTA.
- 4 Respondents were invited to rate their degree of agreement with 17 proposals, on a five-point scale, with space for narrative comment on each proposal. There were six further items asking for comment, advice and suggestions on specific issues.
- 5 In total, 132 responses were received. Half of the responses were from ITT providers: 49 higher education institutions (HEIs), 13 school-centred initial teacher training (SCITT) providers, and four institutions involved in the graduate teacher programme (GTP). The rest provided broad representation from teachers, teacher trainers, parents, governors, local education authorities, professional and subject associations and other bodies such as the Equal Opportunities Commission. The volume and range of the responses provide a sound basis for assessing the degree of the support for the changes proposed. Responses were analysed for differences between ITT providers and others, and between types of ITT provider.
- 6 Most of the free response items attracted 50-60 responses, but there were very few responses to question 11 which sought views on whether all of a provider's inspections should be carried out in the same year. Free response items were coded to identify the frequency and salience of points made. The commentary below highlights the main issues to emerge, but also refers to less frequently made points where these were judged to be potentially significant or helpful.
- 7 This report summarises the responses to the consultation. The tables give the overall number of responses to each item. Not all respondents used the rating scale, and not all responded to each item. The commentary summarises the broad picture from the statistics and uses the written responses to highlight particular points raised by respondents.

## Main Outcomes of the Consultation

- a. The consultation paper and the process leading up to it are warmly welcomed, especially by HE providers and related bodies such as the Standing Conference of Principals (SCOP) and the Universities' Council for the Education of Teachers (UCET).
- b. The consultation produced strong support for the proposed new inspection arrangements as a whole. Aggregating 'strongly agree' and 'agree' on the 'rated' items, 11 out of 17 proposals (questions 1, 2, 3, 4, 5, 6, 7, 9, 13, 14, 15) all attract over 70% support, and several of the key proposals are supported by almost 90% of respondents.
- c. Support for the proposed new strategy for primary full inspections (question 12) is substantial at about 60%. A more 'holistic' approach to assessing primary courses is widely welcomed, but a significant minority of respondents is not yet convinced that foundation subjects and non-subject specific aspects in primary training will in practice contribute sufficiently to the overall grade.
- d. The proposed new strategy for inspecting and grading overall provision across a number of routes in the same provider (question 17) attracts 60% support, but also attracts a number of strong reservations. The key concern is how inspectors will weight the evidence from different routes to ensure that the overall grade is not unduly depressed by one small or weak route.
- e. The proposed new strategy for inspecting small secondary providers (question 18) is not well supported overall, but did generally receive support from those providers most likely to be directly affected. The main objections are that weak subject training might be masked within an aggregated grade, while comparisons of quality across routes and providers will be made more difficult.
- f. There is a feeling among a minority of respondents that the inspection model still implies a heavy burden for large providers, and some good providers remain to be convinced that the lighter touch is sufficiently evident.
- g. The most strongly opposed of all the proposals is question 20, where 46% of respondents disagree or strongly disagree with defining allocations categories **solely** on the basis of inspection grades, and the 30% who do support it do so reluctantly.
- h. There were very few differences between the responses of ITT providers and all respondents, or between HEI providers and SCITT providers on any of the questions. The GTP respondents were too few to count as a separate category. The differences found are mentioned in the question-by-question analysis.

## The Way Forward

- 8 OFSTED and the TTA welcome the very positive endorsement of their proposals for the inspection of ITT from 2002/03. Detailed planning is now being taken forward on the basis of these proposals, taking account of the revised 'Standards for the Award of QTS and Requirements for the Provision of ITT' (latest draft). Account will also be taken of the comments, suggestions and reservations expressed by respondents. Once more detailed inspection plans are available, providers' views will be sought through invited focus groups.

## Question-by-question Analysis

Question 1	Number of responses 132
<i>The inspection regime should differentiate between good and other provision.</i>	
Strongly agree	38%
Agree	54%
Neither agree nor disagree	3%
Disagree	3%
Strongly disagree	3%

- 9 There is a very high degree of agreement with the proposal that the new inspection regime should differentiate between good and very good provision on one hand, and provision which is less than good or is non-compliant on the other. The principle of inspecting good and very good providers less intensively or less frequently commanded wide support from individual ITT providers and from bodies such as SCOP and UCET which provide a wider representation of opinion from the higher education sector. Positive responses generally accepted that differentiated inspection would be a better use of resources. A minority of the responses welcomed the proposed shift in inspection regime, but argued that it needs to be accompanied by clearer guidance on what inspectors would judge to be 'good provision', through, for example, grade criteria or exemplification.
- 10 Few of the very small number of negative responses to this proposal provided a comment or an explanation. The strongest arguments were that poorer providers could be doubly penalised by losing places **and** having more inspection, and that over-inspection of poor provision can be counterproductive by deflecting attention from the key task of bringing about improvement.

<b>Question 2</b>	<b>Number of responses 118</b>
<i>Differentiation should be achieved by having for good provision one short and one full inspection over a six-year period. (Please indicate in your comments your preferred form of differentiation if you disagree.)</i>	
Strongly agree	27%
Agree	50%
Neither agree nor disagree	10%
Disagree	10%
Strongly disagree	2%

- 11 The great majority of respondents supported the proposal with little qualification. Their comments described the proposed form of differentiation as ‘an excellent rationalization of the current process’, ‘more realistic’ and ‘less onerous’.
- 12 The remaining minority of respondents have yet to be convinced that the proposal will in practice be less onerous for good providers. UCET, the National Union of Teachers (NUT) and National Primary Teacher Education Conference (NaPTEC) make this point strongly and a small number of good HEI providers base their disagreement largely on this issue. Several argue that to achieve a lighter load for good providers, the differentiation model should be more radical. There is, however, no strongly preferred alternative model. Some responses suggest a switch to only short inspections and others prefer a regime of only full inspections at four, five or six-year intervals. Five of the responses are sceptical about the value of the proposed short inspections and argue for similar solutions: either one full inspection in the six-year cycle, with no short inspection, or the same pattern with the short inspection replaced by a self-assessment, or by brief monitoring visits focused on action points from the previous inspection.

<b>Question 3</b>	<b>Number of responses 113</b>
<i>In a six-year period, satisfactory provision should have a full inspection every three years, unless the first inspection found provision good, in which case the second inspection would be a short one.</i>	
Strongly agree	26%
Agree	51%
Neither agree nor disagree	14%
Disagree	6%
Strongly disagree	3%

- 13 The great majority of respondents agreed or strongly agreed with the proposed pattern of inspection for satisfactory provision over the six-year period.
- 14 Those who neither agreed nor disagreed and most of those who disagreed supported the principle behind the proposal, but argued for different solutions. Several preferred a full inspection every four years rather than three, and several argued for a six-year cycle which built in structured guidance and support between

full inspections for providers found to be satisfactory, and monitoring visits instead of a short inspection for those found to have improved.

<b>Question 4</b>	<b>Number of responses 115</b>
<i>Borderline and non-compliant provision should have a follow up inspection within a year of that finding.</i>	
Strongly agree	36%
Agree	47%
Neither agree nor disagree	4%
Disagree	11%
Strongly disagree	3%

- 15 There was a very high degree of support for the principle of rapid follow-up for borderline and non-compliant provision. Respondents often added provisos to the effect that follow-up inspection should target only the weaknesses identified, that follow-up should include advice and support, not just inspection, and that a distinction should be made between ‘technical’ and ‘serious’ non-compliance (this last point was covered in Question 15 and in the proposals for dealing with non-compliance).
- 16 The minority of responses which disagreed with the proposal objected mainly to the proposal for reinspection ‘within a year’. On borderline provision, providers of both undergraduate and postgraduate courses argued that it may take up to a year to plan, resource, implement and monitor the necessary changes, and that reinspection would be fairer and more productive the following year. On non-compliant courses, respondents argued that a buffer period of up to six months should be allowed for institutions to plan and resource their response, secure the agreement of partner schools and carry out any necessary training or changes of personnel.

<b>Question 5</b>	<b>Number of responses 113</b>
<i>Providers in category C should be allowed to request an early inspection, subject to conditions which include submitting evidence of improvement and there being a limit of one request every three years.</i>	
Strongly agree	31%
Agree	57%
Neither agree nor disagree	7%
Disagree	3%
Strongly disagree	1%

- 17 There was overwhelming support for this proposal. A small minority of respondents who argued that the proposals were too restrictive had clearly misunderstood them. A few argued that there should be a principle of ‘rapid retrievability’ for category C providers, with access to reinspection subject only to the submission of good evidence of improvement.



<b>Question 6</b>	<b>Number of responses 116</b>
<i>Full inspections should focus on: the quality of training; the standards achieved by trainees; and management and quality assurance (that is, a three-cell assessment framework).</i>	
Strongly agree	30%
Agree	61%
Neither agree nor disagree	7%
Disagree	2%
Strongly disagree	0%

- 18 There was a very high degree of agreement with the proposal for a three-cell assessment framework. Respondents welcomed it as simpler and clearer and focused on the salient issues. They felt that the inclusion of a management and quality assurance cell in all inspections provided what one respondent called ‘a potentially better evidence base for quality’.

<b>Question 7</b>	<b>Number of responses 80</b>
<i>Short inspections should focus on management and quality assurance, include providers’ self-evaluations and improvement plans, and be supplemented by subject-specific evidence supplied by a specialist inspector.</i>	
Strongly agree	21%
Agree	55%
Neither agree nor disagree	5%
Disagree	11%
Strongly disagree	8%

- 19 The model for a ‘short’ inspection outlined in the proposal commands a high degree of support. Those agreeing strongly were particularly attracted by the more general approach to assessing quality through the M cell and by the prospect of a role for self-evaluation in the inspection process.
- 20 However, the minority that did not agree with the proposal was sceptical about the proposed short inspection model, arguing that the key focus for a short inspection should not be on management and quality assurance, but on the quality of training and on standards achieved, since these are the most direct indicators of quality. It was not clear from these responses how such a focus could be compatible with a significant reduction in the burden of inspection. The other issues raised related mainly to lack of information on how self-evaluation and subject-specific evidence would contribute to short inspections, and whether there would be distinct ways of gathering and treating subject-specific evidence in primary and secondary courses.

<b>Question 8</b>	<b>Number of responses 79</b>
<i>If a short inspection raises concerns, it should be followed by a full inspection in the subsequent year.</i>	
Strongly agree	17%
Agree	45%
Neither agree nor disagree	15%
Disagree	15%
Strongly disagree	9%

- 21 This proposal was supported by almost two thirds of those who responded. Responses from SCITTs were slightly more favourable than those from HEIs.
- 22 One theme in the negative responses was the phrase 'raises concerns'. This was criticized as too bland and uninformative as a potential trigger for a full inspection, since short inspections may well 'raise concerns' which are not serious enough to merit a full inspection, and could be more appropriately handled by a lighter-touch, focused re-visit, audit or submission of written evidence. A second reservation, assuming that serious concerns were registered in the short inspection, was the proposal for a full inspection 'in the subsequent year'. The main argument, again, was that it would be more effective to allow for a buffer period of a year, monitoring progress against an action plan, and to reinspect in the second year after the short inspection.

<b>Question 9</b>	<b>Number of responses 103</b>
<i>Full secondary inspections should grade and report on provision in each of the individual secondary subjects offered, together with a report and grade for management and quality assurance across all secondary provision.</i>	
Strongly agree	27%
Agree	52%
Neither agree nor disagree	10%
Disagree	7%
Strongly disagree	4%

- 23 There was a very high proportion of responses agreeing with the proposed outline model for a secondary full inspection. Responses from providers to this question were somewhat less favourable than from other respondents. Respondents strongly welcomed the retention of subject-specific inspection and reporting, and the new element of inspecting and reporting on management and quality assurance across all the provider's secondary courses. Around one in ten of respondents argued that other generic elements of the training should be included to get a rounded view of the quality of provision.
- 24 The minority of negative responses tended to express doubts about the value and the methodology of the M cell, and in particular a concern that the grade might be unduly affected by factors in the partnership which are not within a provider's direct control.

<b>Question 10</b>	<b>Number of responses 57</b>
<i>How might we move to a system of inspecting and grading secondary provision as a whole and under what conditions?</i>	

- 25 Of the 57 responses, 20 were 'no comment' or words to that effect. Few of the 37 substantive responses accepted both the desirability of moving to an overall grade for secondary provision and suggested a mechanism for achieving this. Amongst those that did, there was a slight preference for option (a) of paragraph 24 in the consultation paper, with some support for replacing the phrase 'all secondary subjects' with 'a sample of secondary subjects', especially where the previous subject grades were all either 1 or 2.
- 26 Roughly a quarter of the responses expressed scepticism about the notion of an overall grade, describing it as 'too complex' and 'fraught with difficulties'. Two particular points were made a number of times: that conflating grades across provision into an overall grade would tend to mask strengths and weaknesses which separate grades identify clearly; and that one or two weak subjects in an otherwise good or very good range of subjects might lower the overall grade and in this sense 'misrepresent' the quality of predominantly good or very good courses.

<b>Question 11</b>	<b>Number of responses 13</b>
<i>What are your views about carrying out for each provider in the first half of the programme all short and full inspections in the same year?</i>	

- 27 The predominant response from the few providers who answered this question was negative. The main argument was that concentrating full and short inspections into one year would be extremely difficult to manage for large providers on top of the other internal and external quality assurance processes they are required to prepare and provide documentation for, including Quality Assurance Agency (QAA) assessments.

<b>Question 12</b>	<b>Number of responses 111</b>
<i>Full primary inspections should focus on the three core subjects, take account of the preparation for teaching the wider primary curriculum and report grades for primary provision as a whole.</i>	
Strongly agree	17%
Agree	47%
Neither agree nor disagree	23%
Disagree	8%
Strongly disagree	5%

- 28 Around two thirds of respondents supported the proposal, and even amongst those who disagreed with aspects of it, there was a clear endorsement of a more holistic approach to inspecting primary training, and of the principle of reporting grades for primary provision as a whole.
- 29 The proposal to ‘take account of the preparation for teaching the wider primary curriculum’ was welcomed by the majority in that it widened the scope of the inspection beyond the core subjects, but was also criticized for a lack of clarity. The phrase ‘take account of’ was perceived as neither strong nor clear enough to ensure that foundation subjects and non-subject specific aspects in primary training will contribute significantly to the overall grade. The phrase ‘wider primary curriculum’ was criticized for not providing a clear basis for inspecting foundation subjects or specialist subjects outside the core, or for inspecting the preparation of trainees to promote pupils’ spiritual, moral, and social development.

<b>Question 13</b>	<b>Number of responses 115</b>
<i>Do you agree with the assessment criteria which are based on the proposed new requirements and would result in a judgement about the extent to which providers meet these requirements and enable trainees to meet the standards for QTS?</i>	
Strongly agree	17%
Agree	64%
Neither agree nor disagree	15%
Disagree	3%
Strongly disagree	1%

- 30 Over three quarters of respondents agreed in general terms with the assessment criteria, but few gave their reasons. Those who disagreed with the proposals, or who neither agreed nor disagreed, generally noted objections to one or more criteria in the S cell or the M cell. The Equal Opportunities Commission noted the lack of specific reference to equality and inclusion in the T and M cells, and argued that these issues were not prominent enough in the assessment criteria in paragraph 34.
- 31 On the S cell, there was some concern on criterion (i) that assessing values and attitudes is problematic, is unlikely to be reliable, and does not lend itself easily to grading on the four-point inspection scale. On criterion (vii) it was stated that newly qualified teachers are not in a position to ‘ensure that all pupils have full access to

the curriculum'. The point was also made that the yes/no formulation of the criteria, though consistent with the notion of standards being met or not met, is not consistent with the four-point inspection scale which implies a formulation of the type 'how far' or 'to what extent' standards are met.

- 32 On the M cell, criterion (i) was criticized by a number of respondents on the grounds that the words 'all' and 'fully' set up an unreasonably high expectation which few partnerships could hope to meet, however well managed. More generally, a minority of HEI providers argued that the strong emphasis on partnership throughout the criteria in paragraph 36 (c) would tend to lead to lower grades in areas where staff turnover and shortages are high in schools, even if the provider's management and quality assurance procedures are very good. Several providers argued that that criterion 36 (ii) is slanted towards explaining deficiencies, and is not drafted so as to encourage inspectors to take account of the value added by trainers working with less well qualified applicants in difficult, mainly urban or inner city areas.

<b>Question 14</b>	<b>Number of responses 111</b>
<i>A four-point grading scale, ranging from 'very good' to 'unsatisfactory' should be adopted.</i>	
Strongly agree	22%
Agree	53%
Neither agree nor disagree	8%
Disagree	13%
Strongly disagree	4%

- 33 There was substantial agreement on the adoption of a four-point grading scale in which the current 'adequate' becomes 'satisfactory'. A common theme in the responses was the need to provide better definition or exemplification of the four-point scale in relation to each assessment cell. The minority of responses disagreeing with the proposal argued either for an alternative three-point scale (good, satisfactory, unsatisfactory) or a five-point scale (very good, good, satisfactory, unsatisfactory, poor).

<b>Question 15</b>	<b>Number of responses 111</b>
<i>The non-compliance judgement should be taken out of the grading scheme.</i>	
Strongly agree	31%
Agree	44%
Neither agree nor disagree	13%
Disagree	7%
Strongly disagree	5%

- 34 A high proportion of respondents agree or agree strongly with this proposal, and teachers' professional associations such as the Association of Teachers and Lecturers (ATL) and the NUT, as well as ITT providers, strongly support the distinction between unsatisfactory and non-compliant provision and the distinction between 'technical' and more serious non-compliance. A number of responses

supporting the latter distinction request further detail of how inspectors might interpret it in practice. A small minority of providers argue for a five-point scale in which the fifth point is 'non-compliant' rather than 'poor'.

<b>Question 16</b>	<b>Number of responses 57</b>
<i>What form should self-evaluation take and should this be prescribed?</i>	

- 35 Almost all of the 48 substantive responses welcomed a greater role for self-evaluation by ITT providers in the inspection process. Views on the best form this should take were divided, with no clear consensus. Some responses suggested a format based on the three inspection cells, T, S and M and the action plan from the previous inspection, to provide a kind of progress report. Others preferred a more general sketch of the local and institutional context, relating ITT provision to a mission statement or institutional development plan, as a background to the inspection. Yet others suggested a portfolio of evidence to be put together from sources drawn from a list such as the one set out in paragraph 40 of the consultation paper. On the issue of prescription, there was a very strong preference for a flexible format using a series of broad headings.

<b>Question 17</b>	<b>Number of responses 106</b>
<i>Where there are several routes to QTS within the same provision, all the routes on offer should be covered by the inspection and grades awarded for the overall provision.</i>	
Strongly agree	29%
Agree	33%
Neither agree nor disagree	17%
Disagree	14%
Strongly disagree	7%

- 36 The proposed new strategy for inspecting and grading overall provision across a number of routes in the same provider attracted support from six out of ten respondents. Some providers regarded this as a 'key step' in moving towards more holistic modes of inspection. However, many of the positive responses were not explained in a comment, and a number of strong doubts and reservations were expressed by the minority who did not support the proposal.
- 37 The most common concern was how inspectors will weight the evidence from different routes to ensure that the overall grade is not unduly depressed by one weak area in a route which is new, marginally recruiting, or currently below par. Some respondents objected strongly to the principle of an overall grade in these circumstances. Others stressed what they saw as the need to continue grading each route separately so that strong and weak routes within overall primary or secondary provision are clearly flagged by inspectors. A few respondents doubted whether one inspector could adequately cover the full range of provision.

<b>Question 18</b>	<b>Number of responses 72</b>
<i>Where there are only small numbers of trainees on secondary subject courses, the provision as a whole should be inspected and a set of grades awarded, together with a report on the quality of training of the separate subjects and management.</i>	
Strongly agree	13%
Agree	36%
Neither agree nor disagree	22%
Disagree	16%
Strongly disagree	12%

- 38 The relatively low number of responses to this item and the relatively high proportion of respondents who neither agreed nor disagreed partly reflect a reluctance of primary trainers to comment on it. The proposed new strategy for small secondary providers was supported by just under a half of respondents. This makes it the least well supported of the proposed inspection arrangements. SCITT providers, who are the ones most likely to be affected, generally regarded it as a sensible, pragmatic solution to the inspection of courses where all or most subjects recruit in low single figures.
- 39 Respondents generally acknowledged the problem of grades skewed by tiny numbers of trainees, but were divided on the proposal to replace separate subject grades with an overall provision grade. The main objections were that weak subject training might be masked within an aggregated grade, and that comparisons of subject quality across routes and providers would be made more difficult. However, only about a quarter of respondents adopted this stance. There was virtually no comment on the alternative strategy outlined in paragraph 47 of the consultation paper.

<b>Question 19</b>	<b>Number of responses 67</b>
<i>How should 'small' secondary provision be defined?</i>	

- 40 Respondents suggested a wide variety of definitions of 'small' secondary provision, ranging from 'fewer than twenty trainees per subject' to 'fewer than four trainees per subject'. About 10% of respondents agreed with the suggestion of 5–8 trainees made in paragraph 48 of the consultation paper, but the most common response was 'under 10' or 'in single figures'. Few respondents provided a rationale for their definition.

<b>Question 20</b>	<b>Number of responses 84</b>
<i>The TTA should continue to define allocation categories solely in terms of OFSTED inspection grades.</i>	
Strongly agree	6%
Agree	24%
Neither agree nor disagree	25%
Disagree	26%
Strongly disagree	20%

41 This question, on the use of inspection evidence by the TTA, was the most strongly opposed of all the proposals. Just under half of the respondents disagreed or strongly disagreed with defining allocations categories **solely** on the basis of inspection grades, and the minority who did support it did so reluctantly, expressing doubts about the word 'solely'. The suggestions made for a broader approach, summarized under question 21, indicate respondents were arguing for changes to the allocation process as a whole and did not confine themselves to the definition of allocation categories.

<b>Question 21</b>	<b>Number of responses 62</b>
<i>How should the TTA use inspection evidence to define allocation categories?</i>	

42 Just over half the responses to question 21 argued for a broader, more flexible approach based not just on the latest inspection grades, but on the provider’s track record in inspections and on other data such as recruitment statistics, completion rates, evidence of a significant contribution to regional and national teacher supply in shortage subjects, or of an ability to recruit underrepresented groups into teaching. Evidence on the quality of management and quality assurance was also seen as potentially contributing to a ‘provider profile’.

43 One response in eight argued for a retention of the present system, and a further one in ten supported the proposals set out in paragraph 53 of the consultation paper, agreeing with the use of the M grade at the margins, with a slight preference for option 2 in table 5.

<b>Question 22</b>	<b>Number of responses 81</b>
<i>The TTA should use the most recently available full inspection evidence to define allocation categories and this will mean that in the course of the six-year programme, these allocation categories will be based on different kinds of inspection evidence.</i>	
Strongly agree	9%
Agree	48%
Neither agree nor disagree	25%
Disagree	12%
Strongly disagree	5%

44 Over half the respondents agreed with the proposal, and one described it as ‘the logical and the fairest approach’. The positive responses and those which neither agreed nor disagreed made very similar comments. It was recognised, as one respondent put it, that ‘it cannot be an exact science’ and that compromises have to be made in periods of transition. Although the principle of basing allocation categories on different kinds of evidence was accepted in the circumstances, there were concerns that the inconsistent evidence bases over the six-year period might sometimes unreasonably disadvantage a provider.



<b>Question 23</b>	<b>Number of responses 61</b>
<i>Please add any comments you may have on any aspect of the proposals for the new inspection arrangements.</i>	

- 45 Many responses welcomed the parallel consultations on inspection and on the revised standards for Qualified Teacher Status, and appreciated the tone of the consultation on inspection arrangements. One respondent spoke for many with the following comment: 'We generally welcome these proposals and feel that the consultation document moves a considerable way towards a new spirit of co-operation and constructive dialogue'.
- 46 There were many references to the need for more feedback, dissemination, and professional dialogue as part of a joint endeavour to improve training and raise teaching standards.
- 47 The majority of the issues raised in the responses restated concerns already summarised under earlier questions. The following points were often reinforced in this free response section:
- the model still implies a heavy burden of inspection for large providers with a complex array of routes to QTS
  - sampling across a range of undergraduate and postgraduate routes in one subject and across all the provision for the M cell will require a great deal of documentation for a relatively small amount of inspection
  - the timing of reinspections should recognise the need for an (inspection-free) buffer period of planning, and of rebuilding, including work with the partner schools
  - moves towards an overall secondary grade should not allow one weak course to depress the overall grade when all other courses are good or very good.
- 48 Several providers argued for a value-added element in assessing outcomes and in making allocations, with a greater recognition of the quality of the intake and the context of the partner schools as relevant factors in assessing the impact of the training. It was also suggested that the quality of training might be more positively weighted in the allocations process where it is consistently assessed as very good, so that a provider could be considered as a potential category A even if the S cell is not very good as a result of the constraints of the intake and the context.