

fedas responds

Inspecting post-16 education and training

Informal consultation on the common inspection framework

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The Common Inspection Framework's evaluation requirements and key questions

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Achievement and standards

Question 1 | How well do learners achieve?

The quality of education and training

Question 2 | How effective are teaching, training and learning?

Question 3 | How do resources affect achievement and learning?

Question 4 | How effective are the assessment and monitoring of learning?

Question 5 | How well do the programmes and courses meet the needs and interests of learners?

Question 6 | How well are learners guided and supported?

Leadership and management

Question 7 | How effective are leadership and management in raising achievement and supporting all learners?

These evaluation requirements and key questions are taken from Inspecting post-16 education and training – informal consultation on the Common Inspection Framework. DfEE Publications (ref.P16CIF), April 2000.

Foreword

This is the second of FEDA's new reports on quality and quality improvement. The first was entitled *Understanding the Ofsted schools inspection process* and the next will be on the Quality Assurance Agency's arrangements for subject review of higher education provided in colleges.

This report contains FEDA's response to *Inspecting post-16 education and training – informal consultation on the Common Inspection Framework*, which was published in April 2000 by Ofsted, the Training Standards Council and the Further Education Funding Council (FEFC). It is available from DfEE Publications (ref. P16CIF). We recognise that the framework is just an outline at this stage. We expect that a number of the issues we raise will be addressed in the more formal consultation in the autumn and in the proposed arrangements for quality improvement.

We have looked at the framework, not just from a college perspective, but at how it will apply to training providers, adult and community education and sixth forms. This is in line with FEDA's new remit, which will cover the whole of the post-16 sector that comes under the Learning and Skills Council (LSC).

FEDA will be organising four joint consultation conferences in July 2000 with the Department for Education and Employment (DfEE) to help providers respond to the Learning and Skills Council's proposed quality improvement strategy *Raising standards in post-16 learning* (available from www.dfec.gov.uk/publications). FEDA will also publish our response to the quality inspection strategy. Please contact me if you have any comments on our response to the inspection framework or want to know more about the conferences (see page 7 for contact details).

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Introduction

1. The Further Education Development Agency (FEDA) warmly welcomes the clarity of the common framework and its applicability to different post-16 providers. We recognise that it is only an outline and that many of the issues we raise need to be clarified at the next stage.
2. FEDA very much supports:
 - the emphasis on the learner's experience and on the quality of teaching and learning
 - the link between learning and achievement, and recognition of a broader range of achievement measures
 - the applicability of the framework to very different providers.
3. We feel there needs to be more emphasis on:
 - governance and its role in ensuring successful provision
 - continuing professional development (CPD) and support for staff
 - widening participation, so that the needs of all learners are identified and met
 - supporting small community-based providers so that they can meet the inspection requirements
 - the role of providers within a local system of provision based on increased collaboration and partnership.
4. We would advocate:
 - early publication of inspection reports after inspections
 - a short notice period for impending inspections
 - a grading system of five grades to include management as well as curriculum areas
 - acknowledgement of the increasing amount of learning that is not course based, e.g. online, work-based, distance and community learning, in both descriptors and grading.
5. We would suggest clarification of:
 - terminology, particularly with respect to the criteria, variously described as standards and statements of good practice
 - how inclusive learning and equal opportunities are applied across the framework
 - the distinctive roles of the inspectorates and the LSC in self-assessment, action planning, promoting good practice, quality improvement and determining the adequacy of provision
 - how the framework will apply to area inspections and how and why they will be undertaken.

FEDA responds to the key questions

Do you agree with the proposed principles?

6. The principles are sound. We particularly support the underpinning focus on the experience of individual learners. This could be made explicit in the common principles.
7. The final principle – ‘what happens after an inspection’ – is helpful in drawing attention to the need to evaluate the inspection and check the report with the provider. However, it is not clear enough about what happens after the provider produces an action plan. Clear channels of communication are essential. We would suggest that the boundary between the role of the inspectors and the LSC in follow-up monitoring and in quality improvement is articulated in the principles.
8. Some of the statements require further clarification to be useful; for example ‘staff working for the provider *should be involved with* the inspection process’ could merely be stating the obvious.
9. The section on how inspectors conduct themselves should include references to courtesy, confidentiality, and minimising stress within the organisation.
10. The section on quality of judgements and information should define what is meant by ‘evidence gathered is *sufficient*’, e.g. indicate that evidence should be first hand, reliable and supported by other evidence.

Are the seven key questions the right ones?

11. The division into three sections – ‘achievement and standards’, ‘the quality of education and training’ and ‘leadership and management’ – is sensible, but may give insufficient weight to the interrelationship between the three.
12. We suggest rephrasing question 1 – ‘how well do learners achieve?’ – to read: ‘how will the learners achieve their learning goals?’, to signify the broad range of outcomes that can be achieved.
13. In question 5, we suggest that ‘programmes and courses’ should be replaced by ‘provision’. This would give due recognition to the range of learning opportunities and environments, e.g. online and workshop, distance and work-based learning, that characterise a forward-looking post-16 sector.
14. We have concerns about question 7 (‘how effective are leadership and management in raising achievement and supporting all learners?’). The framework does not distinguish sufficiently between the executive role of the manager, principal or headteacher and the role of the governors or board; they both have strategic and leadership roles, although they differ. This may not be as important in a small provider as in a large institution where leadership functions are clearly delineated.

The Framework specifies what must be evaluated. Are the evaluation requirements appropriate to help in answering the key questions?

15. Most of the evaluation requirements are appropriate, assuming that they will be further specified in the inspection handbook. We would expect, for instance, that the evaluation requirements for achievement would take account of the nature of the provider and the student body, e.g. small providers widening participation or a sixth form college. This would enable the inspectors to look at ‘distance travelled’ and the value added of each particular provider.
16. In addition to evaluating staffing, accommodation and learning resources, the inspectorate should evaluate the resources available to support teachers, including both staff development and, for example, access to IT (question 3).
17. We question whether the inspectors should be identifying how far programmes match community and employer needs (question 5) through looking at an individual establishment. This role may be more appropriate to providers themselves and the local LSC. We would like to see some reference to inspectors consulting with customers, such as parents, students and the local community.
18. The strategic responsibility of institutions is insufficiently captured in the areas to be evaluated in question 7 (leadership and management), which appear to be very inward-looking. Because inspection is such an important driver of institutional priorities, it is essential that it emphasises the effective use of resources, not only internally but in relation to the institution’s responsibility to its community. The new Learning and Skills proposals place greater emphasis on local providers operating in collaboration to meet local needs and this should be reinforced through inspection.

Inspectors will use criteria, statements of good practice, as they apply. Are the criteria helpful in making judgements?

19. It is helpful that the statements are grouped throughout in relation to the impact on learners.
20. The introduction to the framework states that 'reliable application of the criteria is fundamental to the security and validity of judgements' (paragraph 18), but there is no indication yet of how judgements will be moderated so that reliability is attained. The words 'criteria', 'standards' and 'good practice' are used interchangeably in this draft framework to refer to these statements. It would be helpful to providers if terms were used consistently and the statements modified accordingly; for example, a standard can be a baseline or an aspirational standard.
21. Paragraph 18 also states that 'inspectors will use as many as apply'. FEDA would recommend that the provider is clear in advance about which ones are to be used and the basis on which the decision is arrived at. For example, it should be clear whether it will be by agreement. There are particular statements, which are not appropriate to an adult cohort or college; for example, the statements on student behaviour seem more relevant to schools than adult volunteers for learning.
22. Another way of approaching this issue would be to have a core and options approach, indicating which statements must be applied to all providers. Alternatively, further guidance could make explicit which applied to certain kinds of providers. New small providers may need extra assistance (e.g. phased-in requirements or pairing with larger providers) to meet the range of quality criteria.
23. Additional areas where the statements could be clarified or extended include:

Question 2 | How effective are teaching, training and learning?

- 'methods and styles of teaching and training consistent with the aims of their programmes and learners' *personal objectives*'

This could usefully refer to meeting the needs of different students and their learning styles (a key premise of the FE concept of 'inclusive learning').

We would like inspection to look at how many staff are trained, and have up-to-date experience in their specialism or sector. The 'range' should be extended to 'reflect the mix of population in the local community'.

- 'present material in a way that is sensitive to issues of equal opportunity'

Effective recognition of equal opportunity in teaching and learning should include much more than presentation of material: for example, curriculum content and design, teaching and learning and support methods.

Question 3 | How do resources affect teaching and learning?

There should be a statement about resources for teaching, as lack of facilities can impair the quality of learners' experience. We would also include staff development; for example, what are providers doing to update and support staff? The impact of staff development on the learning process is key to student achievement.

It would be helpful if there were a reference in the section on resources to all students, including those with particular support requirements.

Question 6 | How well are learners guided and supported?

The section on learner support would benefit from more emphasis on sufficient levels of support to meet learners' identified needs.

In this area it is also particularly important to elicit feedback from learners.

In FEDA's work for the DfEE and the Social Exclusion Unit on a good practice framework for disengaged young people, we are recommending that attention should be paid in the inspection framework to:

- how learners are engaged
- the provider's competence in ensuring multi-agency approaches to meeting these learners needs.

This applies equally to widening participation for adult learners.

Question 7 | How effective are leadership and management in raising achievement and supporting all learners?

This section would benefit from some statements that apply more specifically to the governors or board, where they exist, and the standard of their leadership and stewardship.

The effective monitoring of targets, quality systems and equal opportunities policies should be emphasised.

The 'best value' principles will need to be spelled out for providers who have not yet been required to apply them when securing resources and services.

The statement that success for learners is achieved at an acceptable level is not a sufficiently clear indicator of value for money.

Other aspects of inspection and reporting

The consultation proposes a possible outline structure of an inspection report. Is the proposed report structure appropriate?

24. The report structure appears to be appropriate and conforms broadly to current practice. It is not clear how it would apply if only particular aspects of provision are inspected, or in area inspections.
25. It is unclear in paragraph 20 why 'judgements on key aspects of the provider's work' only 'may take the form of grades'. Providers need to be clear from the outset what will be graded and it would be unhelpful to leave an element of discretion, as the statement implies.

It is intended that there will be a single grading scale. What is the preferred scale: 7 or 5 points?

FEDA supports a 5-point scale.

26. This is a sensitive issue because colleges and training providers are used to a 5-point scale and schools are used to a 7-point scale. The 7-point scale provides the opportunity to apply the same grades throughout a school, and to make finer graduated judgements. However, it will be extremely difficult to make such fine discrimination between grades when inspecting provision as diverse as community-based adult education and school sixth forms. Five grades are sufficient to identify areas that are outstanding or particularly poor, as well as to provide sufficient guidance on areas requiring improvement. Five grades are considered adequate in higher education and in quality frameworks used in the business sector.
27. There is also a case for a 6-point scale, because it avoids convergence on a mid-point; in some post-16 sectors a 3 is regarded as the norm, or an acceptable level, whereas in others it is viewed as 'not good enough'.
28. We agree that clear grade descriptors and criteria, which take account of the relative weights of strengths and weaknesses, are essential. It will be important to ensure the full range of grades is applied in a similar fashion by Ofsted and the Adult Learning Inspectorate, so that comparisons between providers in a locality are valid.

The Framework is intended primarily for inspection but it can also provide the basis for self-assessment. Does the Framework provide an appropriate basis for self-assessment?

29. The relationship between the criteria in the framework and the self-assessment requirements within the LSC's quality improvement strategy should be clearly explained. It is important for providers that both inspection and the quality improvement strategy use a similar set of criteria, as these will drive internal processes and goals.
30. In its present form the framework does not provide sufficiently explicit criteria for self-assessment.
31. We recognise that the new inspection framework is not based on verifying the self-assessment report, as is currently the case with FEFC inspection. However, self-assessment and action planning are key contributors to raising standards. We believe that self-assessment should be more than just providing evidence that *may* be considered by the inspectors, as is the case with self-evaluation under the current Ofsted schools framework. Self-assessment should be part of providers' ongoing quality assurance system and should be considered along with other evidence of quality improvement processes as an essential element of the evidence base for inspection.

The document indicates different possible roles for a provider's nominee. Do you think a provider's nominee should attend team meetings where collective judgements are being made?

32. There is a difference between the role of the headteacher in a school as the main link with the team and the college or training provider's nominee. Although we do not believe that the provider's nominee needs to be present when collective judgements are being made, they can perform a useful role when findings are being discussed. They can act as an 'observer' to help ensure the transparency of the process; they can be an 'information source', providing a useful conduit of information which may not otherwise be available to the team, and ensuring factual accuracy.

Comments on other aspects of the framework, including other issues to be resolved

33. Comments are invited on other issues; most of these are important technical issues and we would wish to comment in more detail on the forthcoming formal consultation paper. We would like to draw attention to some issues for consideration when firming up the framework.
34. Additional principles might be transparency and making as much information as possible public. One implication of this stance would be to publicise all grades (though we are not in favour of this for individual teachers), and to make reports public as soon as possible.
35. Looking to the future, we would wish to see grades awarded for learning that takes place in different modes and contexts such as online, in workshops, distance and work-based learning. Attention should also be paid to how provision of key skills is graded when integrated into curriculum areas, and how other enrichment activities are graded.
36. Identification of good practice by the inspectorate should be based on inspection evidence. The purpose of international comparative studies undertaken by the inspectorate should be made clear; it seems this is a more appropriate role for the LSC or for research bodies.
37. The exact role of area inspections, their relationship to the inspection framework and grading criteria, to LEA inspections and the responsibility of different parties in relation to adequacy of provision is still unclear. Area inspections should make use of previous inspection reports and data collected by local LSCs to avoid overloading providers.
38. A significant overlap in inspection and quality monitoring activities would constitute a waste of resources; they must be complementary. As we have indicated in the introduction to this response, we look forward to the next version of the framework and the LSC quality improvement strategy to clarify the precise relationship and responsibilities of the inspectorates and the LSC.

Key documents

DfEE. *Raising standards in post-16 learning*. Available from the DfEE website and from DfEE Publications (ref. P16RSC), 2000.

Steele, A. *Understanding the Ofsted schools inspection process*. Available from the FEDA website. FEDA, 2000.

Ofsted, the Training Standards Council, FEFC. *Inspecting post-16 education and training – informal consultation on the Common Inspection Framework*. DfEE Publications (ref.P16CIF), 2000.

Further information

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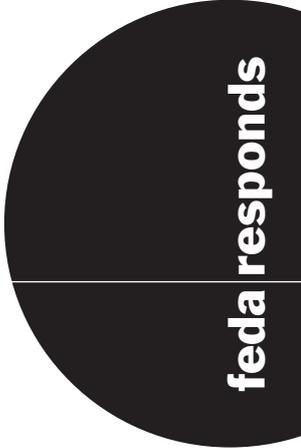
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This report is the second in a series on Quality, and contains FEDA's response to *Inspecting post-16 education and training – informal consultation on the common inspection framework*. FEDA has taken this opportunity to examine the framework, at its outline stage, from the new perspective of the broader post-compulsory sector.



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