

INSPECTING POST-16 EDUCATION AND TRAINING

INFORMAL CONSULTATION ON THE COMMON INSPECTION FRAMEWORK

Response from THE FURTHER EDUCATION FUNDING COUNCIL

Introduction

1 The Council welcomes the government's commitment to establishing a Common Inspection Framework and the opportunity to comment on the published draft as part of this informal consultation. The Council fully endorses the view, expressed by the chief inspectors, that the government's initiative provides an opportunity to think afresh about how inspection can help all providers of post-16 education and training improve quality and standards. Work on the framework to date represents a significant achievement in bringing together and developing the inspection practice of Ofsted, the Training Standards Council and the Council's own inspectorate.

2 The following paragraphs respond to each of the questions in the consultation. In formulating its response, the Council has taken note of the views of the Quality Assessment Committee which advises the Council on matters of quality.

THE DRAFT FRAMEWORK

PART A

Q1. Do you agree with the proposed principles?

Summary response: Strongly agree

3 The Council strongly endorses the framework's emphasis on learners, their experiences and achievements. It particularly welcomes the commitment to assess the extent to which provision is socially inclusive and promotes equality of opportunity. The Council would wish to see reference to self-assessment in the principles. This activity has been given particular emphasis by the government and is a major feature of quality assurance and improvement in further education. A reference to governance in paragraph 3 would also be helpful since college corporations, and similar bodies in non-sector providers, have a key role in setting expectations in relation to quality and standards.

4 The notion of accreditation for inspectors is welcomed, as indicated in paragraph 4. The Council would wish to see a unified programme of training and accreditation to reassure providers that the skills of all inspectors are compatible and their approach is

consistent, particularly during college inspections jointly staffed by Ofsted and the Adult Learning Inspectorate (ALI).

5 In addition, thought will have to be given to the training and accreditation of auditors, or other specialists, who join inspection teams as occasion demands. It is the Council's view that some aspects of the inspection of leadership and management will warrant the involvement of auditors to gather and assess evidence. The inspectorates, in consultation with the Learning and Skills Council (LSC), will have to decide whether this should be a joint operation or whether assessment by auditors may be done separately by the LSC. The Council's current practice of joint working between inspectors and auditors has much to commend it, in terms of ensuring a consistent approach. The publication of audit opinions in inspection reports, in tandem with the issue of a separate audit report to the college, has also added momentum to quality improvement. It is to be hoped that these aspects of current practice will not regress under the arrangements developed for the LSC and the inspectorates.

6 With reference to paragraph 5, the Council would wish to see a published code of practice for inspectors.

7 The Council supports the openness conveyed by paragraphs 6 and 7, and the importance placed on action to be taken after inspection.

PART B

8 The Council recognises the challenge of developing a framework applicable to a wide range of providers offering a curriculum catering for learners of all ages with a variety of interests and aspirations. It commends the attempt made to keep the framework concise and clearly focused. The Council would, however, wish the elements of the framework to be kept under review over the coming months as the quality improvement strategy and monitoring operations of the LSC are developed. This will ensure that there is no duplication or confusion in the demands made on providers.

Q2. Are the key questions the right ones?

Summary response: Tend to agree

9 The strategy of inspection seeking to answer specific questions should be helpful to those inspected. Those questions proposed convey very clearly the focus on learning and its outcomes. However, the drawing together of such wide variety issues into a single question on leadership and management is ambitious. This is particularly the case if the inspectorates propose to make a single aggregated judgement in relation to provision covered by the leadership and management question. It may be more helpful to those inspected (and to inspectors) to add one or two questions to convey more clearly what inspectors will be seeking in relation to, for example, governance and value for money.

Q3. Are the evaluation requirements appropriate to help in answering the key questions?

Summary response: Tend to agree

10 The evaluation requirements are considered helpful in defining what should be assessed when answering the key questions. Their scope and wording are, however, of particular importance since they are presented as an exclusive list to be applied to all inspections. As such, they will be highly influential in moulding provision. In some cases, the wording might be reviewed to clarify meaning. For example, reference to governors meeting '*their responsibilities*' is open to wide-ranging interpretation. Amplification would be helpful to providers. In other cases, consideration might be given to including additional requirements. The Council recommends that, in particular, the requirements are reviewed to ensure that the interests and needs of employers, the community and adult students are adequately reflected. The framework should also ensure that providers are encouraged to focus on the pastoral needs of young people.

Q4. Are the criteria helpful in making judgements?

Summary response: Strongly agree

11 The use of positive statements about provision has been found by the Council to be beneficial to the process of self-assessment and inspection. The Council therefore endorses the general approach adopted for the criteria. Experience of inspecting further education has shown that the wording and scope of the criteria have significant influence on the development of provision. In this context, the Council is particularly concerned that the criteria adequately reflect the importance of self-assessment as a key element of quality assurance, financial controls relevant to the use of public funds, and the legal duties of governors in colleges. Equally, it is concerned that the criteria are expressed in a way which is appropriate to all providers and learners, particularly adults, and that they reflect the need for learners' views of provision to be taken into account by both providers and inspectors.

OTHER ASPECTS OF INSPECTION

Q5. Is the proposed report structure appropriate?

Summary response: Tend to agree

12 The proposals set out in paragraphs 19 and 20 lack detail and need further work. At present it is not sufficiently clear how the use of the framework will lead to specific report sections. The suggestion that there might be sections on each course or

programme inspected may result in untenably long reports, given the breadth of the further education curriculum. It is also not made plain whether and, if so, how inspection reports may differentiate provision for students aged 16-18 from that for students aged 19 and over, in order to make comparisons across from colleges to schools. Nevertheless, the proposal that there should be a freestanding summary is welcomed. The Council recommends that the summary includes a clear statement about the provider's capability with regard to self-assessment. It also strongly recommends inspectors' overall judgements about provision should be expressed in the form of grades as well as text.

Q6. What is the preferred grading scale: 7- or 5-point, or do you have no preference?

Summary response: 5-point scale

13 The use of grades to summarise inspectors' judgements, and their subsequent publication, is convenient to those inspected, those who administer education and the public at large. The Council's view is that grades should not be endowed with more than an ability to represent judgements in the broadest terms. Such a strategy would reduce attention to the detail of inspectors' written judgements. Care must therefore be exercised in deciding not only the scale and definition of grades but also on what aspects of provision should be graded.

14 The Council's experience is that the five-point scale used by its inspectorate has been successful in indicating the quality of provision inspected. The five points are sufficient to differentiate extremes of quality and provide clear messages about whether colleges are doing well or need to take action to improve. The five-point system is also well understood by all those concerned with further education since it has been in operation for seven years. In this context, the Council has no wish to advocate change. It recognises, however, that the most critical feature of any grading system is whether it is applied consistently. This, more than the number of points, is the issue at stake.

Q7. Does the framework provide an appropriate basis for self-assessment?

Summary response: Tend to agree

15 The Council warmly welcomes the explicit commitment to self-assessment included in the common framework and agrees that the framework itself provides a useful guide for self-assessment. The importance of self-assessment should not be understated. It is a key element in quality assurance and improvement, and has been successfully introduced in both the FE and private training sectors.

16 In this context, the framework will need to be supplemented by additional guidance to help those working in the wide variety of post-16 providers interpret it to best effect. Assessing the extent to which learners are '*prepared for effective participation in the workplace and the community*', for example, will depend significantly on the content

of learners' programmes and the context of their studies. The Council would wish to see the development and publication of guidance made a priority. In the interim, it is to be hoped that the inspectorates will make every effort to accommodate colleges' existing arrangements for self-assessment, implemented according to Council guidance.

Q8. Do you think the 'provider's nominee' should attend inspection team meeting where collective judgements are being reached?

Summary response: Should attend

17 The key determinant of policy in this matter should be that which will make quality improvement and inspection most effective. The involvement of the nominee ensures that colleges are able to interpret their inspection and its outcomes in the most beneficial way. The Council's experience is that the college nominee role is highly valued by colleges. Evaluations of inspections completed by colleges provide strong evidence of the value placed on this aspect of inspections. It is seen as a significant indicator of the Council's commitment to openness and transparency.

18 It is the Council's view that the presence of the nominee at meetings where collective judgements are reached should not detract from the process provided that nominees fully appreciate their role. To the contrary, nominees can assist the inspection team's task of reaching comprehensive and fair judgements by providing factual evidence and clarification where necessary. The success of the Council's arrangements is, in part, based on clear guidance on the role of the college nominee in the Council's published inspection handbook and a training programme offered to all nominees by the inspectorate.

Additional comments on other aspects of the framework, including other issues to be resolved (section 1, paragraph 25)

Inspection planning and sampling

19 The Council's current arrangements, which provide for a sample of work to be inspected, are considered to work well because the sample is based on consideration of a college's self-assessment and the Council's own priorities. This is seen to reflect the growing maturity of the Council's relationship with the sector since the introduction of self-assessment. The Council's experience is that well-thought out sampling of the curriculum, with thorough inspection of governance, management and other aspects of cross-college provision, results in a robust indication of the quality of a college's provision and efficient use of inspectorate resources.

20 The new regime provides an opportunity to develop this approach further by considering how risk assessment, based on analysis of performance indicators, can lend further efficiency and value to the inspection process. The Council does not advocate an approach which always seeks to inspect all provision. This would be unnecessarily burdensome to providers and inefficient, given data of other kinds available which

indicate quality and standards. It would also run counter to the philosophy of 'intervention in inverse proportion to success' espoused by the government. In this regard, the Council strongly recommends recognition of the FEFC accredited status achieved by some colleges when inspections are planned.

Grading

21 The breadth of the further education curriculum suggests that a degree of aggregation is essential when grading curriculum provision. The Council therefore recommends that the grading of curriculum provision should be aligned to funding arrangements to facilitate links between funding and quality. As part of the assessment of curriculum provision, inspectors will observe and judge lessons and other taught activities. Judgements may be based on a very limited sample of individual teacher's work and therefore Council does not recommend that individual lesson grades are reported. Such an approach might be construed as unfair, particularly if some teachers were not observed. With regard to those aspects listed under the heading of leadership and management, consideration should be given to a disaggregation of judgements and grades in order to reveal explicitly any differences in the standards of governance and management.

22 The Council strongly believes that all grades awarded by inspectors should be published or, at least, available for public scrutiny, with the exception of grades awarded for individual lessons.

Adequacy of provision

23 The Council's current arrangement, which determines that all provision judged unsatisfactory is re-inspected, has been proven to work well. Evidence from reinspections confirms that the great majority of colleges take purposeful action to make rapid improvement. The Council commends this approach. The definition of adequacy which may lead to additional support through the work of the LSC might, however, be less mechanistic. Experience has shown that the nature of support needed by a college depends to a significant extent on its circumstances. The Council recommends that any future arrangements involving the inspectorate which go beyond re-inspection should be developed jointly with staff of the LSC.

Value for money

24 Careful thought will need to be given to the measurement and assessment of value for money. While recognising the need for benchmarks in this area, the Council would not wish to see a formulaic approach adopted when assessing this aspect of provision. Such an approach may inhibit providers' willingness to respond appropriately to the needs of learners and to opportunities which require investment to reach new learners. It is to be hoped that this aspect of the inspectorates' work will be developed jointly with staff from the LSC.

Operational issues

25 The Council recommends that inspections should be scheduled so that the great majority of inspection activity takes place within one week, provided that an adequate sample of work is available to inspect, and that notice of inspection should be no longer than approximately two months. The team composition, duration of inspection and period of notice should all be the least required to achieve a rigorous outcome. This approach would minimise the burden of inspection on providers.