



Department  
for Education

# **Performance reporting for FE college groups and multi-site colleges**

**Government consultation**

**Launch date 10 April 2018**

**Respond by 10 June 2018**

# Contents

Introduction	3
Who this is for	4
Respond online	5
Deadline	5
Definitions	6
1. The current performance reporting system	7
2. Our policy objectives	8
3. Our proposals: overview	9
4. Colleges that are part of a group	10
Sub-brands	11
Scope	11
Implementation	12
5. Multi-site colleges	14
Multi-site colleges: options	15
Evaluating the options	17
Multi-site colleges: your views	19
6. Implementation	21

## Introduction

We need a world-class technical education system that develops young people's talent and ensures that they have access to the training they need right on their doorstep. Fundamental to our ability to achieve that goal are strong, resilient colleges delivering high quality education and training that meets both local and national needs.

Colleges have strong local roots – both in their own histories, and in the central role they continue to play in their local communities. We know that 70% of FE learners travel less than 10km to study, with 50% of learners travelling less than 6km<sup>1</sup>. We also know that variation in local outcomes from education and skills are one of the biggest drivers of regional variations in productivity. That is why, in our plan for improving social mobility through education<sup>2</sup>, we set out our ambition that no community should be left behind.

Strong accountability, at a local and national level, plays a central role in underpinning high quality provision in every community, and supporting social mobility. Public reporting on the performance of colleges, including through 16-18 Performance Tables and National Achievement Rate Tables, is a cornerstone of this accountability; it also helps inform choice by learners, and supports quality improvement.

This consultation seeks your views on proposals to strengthen public reporting on performance for colleges. The proposals apply to institutions within the further education sector<sup>3</sup>: further education colleges (including both general and specialist FE colleges), sixth form colleges, and institutions designated as being within the further education sector.

The consultation is focused on the existing educational performance measures that are included in official performance reporting for further education provision. These include achievement rates, progress measures, learner destinations and outcomes. It does not propose any changes to the measures themselves. Other, non-educational performance measures, such as financial indicators, are not in scope of this consultation. No changes are proposed to the current system for allocation of funding.

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<sup>1</sup> Understanding the Further Education Market in England, BIS Research Paper 296, July 2016

<sup>2</sup> Unlocking Talent, Fulfilling Potential, DfE, December 2016 CM 9541

<sup>3</sup> As defined by Section 91(3) of the Further and Higher Education Act 1992

## Who this is for

This consultation will be of interest to:-

- FE colleges (including both general and specialist FE colleges), sixth form colleges, and institutions designated as being within the FE sector
- Principals / Chief Executives, governors, and senior leaders of those institutions
- Local authorities, local enterprise partnerships, and Mayoral Combined Authorities

Other interested parties may include students, young people and adults, parents and carers, and other post-16 and FE providers (including schools, academies, adult education and independent learning providers).

## Issue date

The consultation was issued on 10 April 2018.

## Enquiries

If your enquiry is related to the policy content of the consultation you can contact the team by emailing:

[FEperformance.consultation@education.gov.uk](mailto:FEperformance.consultation@education.gov.uk)

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the DfE Ministerial and Public Communications Division by email: [consultation.unit@education.gov.uk](mailto:consultation.unit@education.gov.uk) or by telephone: 0370 000 2288 or via the [DfE Contact us page](#).

## Additional copies

Additional copies are available electronically and can be downloaded from [GOV.UK DfE consultations](#).

## The response

The results of the consultation and the Department's response will be [published on GOV.UK](#) in Summer 2018.

## Respond online

To help us analyse the responses please use the online system wherever possible. Visit [www.education.gov.uk/consultations](http://www.education.gov.uk/consultations) to submit your response.

## Other ways to respond

If for exceptional reasons, you are unable to use the online system, for example because you use specialist accessibility software that is not compatible with the system, you may download a word document version of the form and email it or post it.

### By email

- [FEperformance.consultation@education.gov.uk](mailto:FEperformance.consultation@education.gov.uk)

### By post

FE Performance Reporting Consultation  
Careers and Further Education Group  
Department for Education  
1<sup>st</sup> Floor, Sanctuary Buildings  
20 Great Smith Street, London, SW1P 3BT

## Deadline

The consultation closes on 10 June 2018.

## Definitions

This consultation concerns colleges, groups, campuses, and other structures. These terms are widely used across the sector. However, they are used in a variety of different ways and in different contexts. For the purposes of this consultation, we are using the terms as follows:-

<b>Delivery site</b>	We use the term <b>delivery site</b> to mean a geographical location operated by a <b>corporation</b> from which further education provision is delivered. A <b>delivery site</b> could in practice be labelled as a centre, campus, college, or farm, or with another similar term.
<b>On-site provision</b>	We use the term <b>on-site</b> to describe further education provision that is mostly delivered from a <b>delivery site</b> .
<b>Off-site provision</b>	We use the term <b>off-site</b> to describe further education provision that is mostly delivered from a location other than a <b>delivery site</b> .
<b>College</b>	We use the term <b>college</b> to mean an institution with a single learner-facing identity, brand or name, viewed by learners as distinct, with its own prospectus and/or website, through which a <b>corporation</b> delivers further education provision <sup>4</sup> .
<b>Multi-site college</b>	We use the term <b>multi-site college</b> to refer to a <b>college</b> that has more than one <b>delivery site</b> .
<b>Group</b>	We use the term <b>group</b> to mean a <b>corporation</b> that delivers its further education provision through more than one <b>college</b> .
<b>Corporation</b>	We use the term <b>corporation</b> to mean a further education corporation or sixth form college corporation within the meaning of the Further and Higher Education Act 1992, or the governing body of an institution designated under Section 28 of the same Act <sup>5</sup> .

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<sup>4</sup> Although many such institutions will in practice also be labelled as a college, there are alternative terms that may be used - for example institute, sixth form, or "academy" (excluding academies under the Academies Act 2010)

<sup>5</sup> Where the designated institution is conducted by a company, this can be the governing body as provided for by any instrument of government, the company, or both.

# 1. The current performance reporting system

The current performance reporting system for FE colleges operates at the level of the corporation. That reflects the fact that both funding, and accountability for the quality of educational delivery, sits at that level. That must remain a core part of any future performance reporting system: however large or complex its activities, and wherever its provision is delivered, it is the corporation that is the accountable body.

The current system works well where the corporation is responsible for a single college, and that college delivers on a single delivery site. In the past, most corporations operated on that basis, and it continues to be the predominant model for sixth form college corporations. But for general FE corporations our estimate is that there are now fewer than 50 single college / single site corporations. The majority of general FE corporations now have a more complex delivery model, with multiple delivery sites, and (for groups) multiple colleges.

Those changes in the structure of the sector have implications for how well the performance reporting system now works. For learners, the changes mean that there is sometimes only very limited official performance information available to inform their choice of institution. The changes have also weakened local accountability, and because performance information is now only presented at an aggregate level across corporations that are often very large, it can weaken incentives on corporations to address specific aspects of provision that need improvement. For Government, it also makes it more difficult to identify priorities for targeted support – for example through the Opportunity Areas programme. And the way the system operates at present can make it harder for corporations to compete with other post-16 providers, including school sixth-forms.

## 2. Our policy objectives

We have three main policy objectives: to improve information for learners; to strengthen local accountability; and to support quality improvement.

In meeting these policy objectives, we also want to mitigate any perverse or unintended impacts. In particular, it is important that any changes do not undermine the primary accountability for performance, which should continue to rest with the corporation. We also want to ensure that the system applies fairly and transparently to all corporations, and that it generates robust and reliable performance data. And we want to avoid creating excessive or disproportionate new reporting burdens on corporations, or artificial incentives that reward some structures and penalise others.

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



### 3. Our proposals: overview

We are inviting views on two different proposals for achieving our policy objectives. In both cases, the proposals would supplement, and not replace, the existing performance reporting system that operates at the corporation level.

The proposals would apply to the further education provision of institutions within the further education sector<sup>6</sup>: further education colleges (including both general and specialist FE colleges), sixth form colleges, and institutions designated as being within the further education sector.

The first proposal looks at how we might improve the system so that it works more consistently **between** colleges, particularly for **colleges that are part of a group**. The second proposal looks at options for improving the system to enhance performance reporting **within** colleges, particularly for **multi-site colleges**.

We think that these two proposals are broadly complementary. Whilst our policy objectives are relevant to all corporations, the policy approach that is adopted needs to take into account the range of delivery models in the sector. In this case, our first proposal is focused on the issues around groups, whereas our second proposal is focused on the issues around multi-site colleges (including multi-site colleges that are part of groups).

Both proposals need to be considered in their own right: each has its own benefits and potential drawbacks. Whilst in theory we think it would be feasible to adopt either or both of the proposals, in practice we think that the first decision to be made is on the treatment of colleges that are part of groups. This would then set the context for a decision on the proposals for multi-site colleges. That is how we have set out the detailed discussion of the proposals that follows.

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<sup>6</sup> As defined by Section 91(3) of the Further and Higher Education Act 1992

## 4. Colleges that are part of a group

From a learner and public perspective, colleges are the principal institutional unit of provision. That is recognised by many groups, for which the local identities of their constituent colleges have valuable resonance and recognition with learners and their local communities. Other distinct, learner-facing institutional identities – for example “sixth form” – are also widely used by corporations to market specific areas of provision, helping them to compete more effectively against schools and other post-16 providers.

The development of groups means that in an increasing number of cases, there is a mismatch between the entities for which publically available performance information is available, and the colleges that learners and the public view as the provider. That is because public performance information is only reported against the group’s UKPRN or URN – there is no public performance information reported at the college level<sup>7</sup>.

From a learner or public perspective, that can lead to an uneven picture in terms of the information available on different colleges. For example, there may be circumstances where for two neighbouring colleges, one college that is not part of a group has a full range of performance information publically available, whilst the other college that is part of a group has only very limited information available.

That is not in the interest of learners. But it may also not be in the interests of groups, particularly where they are seeking to compete or promote their offer against other local providers such as schools, for which performance information is available.

To address these issues, **we are proposing that for all groups, performance should be reported at college level as well as at group level**<sup>8</sup>. This would mean that across the sector, there would be publically available performance information for all colleges, irrespective of whether those colleges were part of a group or not.

Figure One below sets out how this proposal would apply in a fictional example where there are a number of colleges that are part of a group.

In this example, our proposal would mean that performance information would be available for Casterbridge College, Fenbridge College, Fenbridge Sixth Form, Cowfield College and the Casterbridge School of Art. These are all distinct institutions, with their own learner-facing identities, their own websites and/or prospectuses.

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<sup>7</sup> In this respect, the treatment of colleges within a group is different from the position of group subsidiaries that are wholly owned training providers. Such wholly owned providers are distinct legal entities and in most cases will have their own funding contract and UKPRN, and be subject to separate reporting.

<sup>8</sup> See definitions for how we are using the terms college and group.

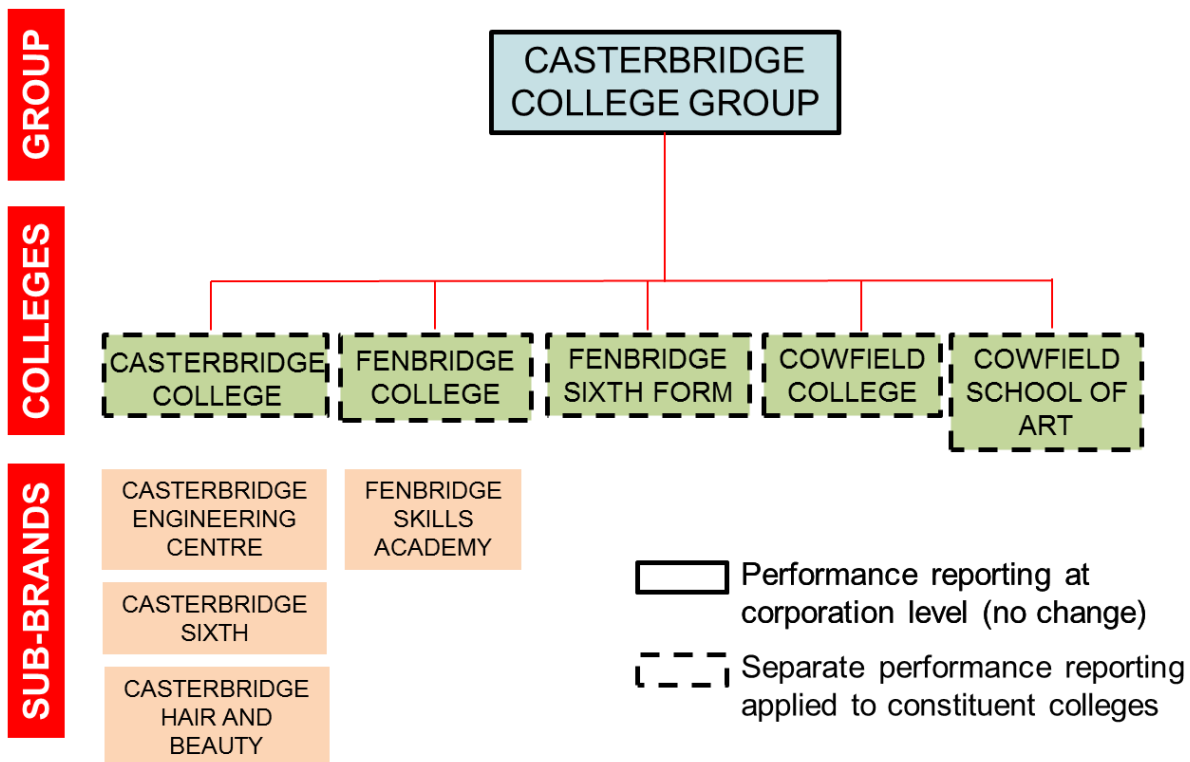


Figure One : Example of application of separate performance reporting for colleges that are part of a group

## Sub-brands

In line with how we are defining the term college, the requirement for separate reporting would only apply at an institutional level. It would not apply to branded provision within a college where such provision is clearly part of the same institution.

In the fictional example, whilst each of the college entities has a distinct institutional identity from a learner perspective, that is not true of the sub-brands within the college. Those sub-brands – for example the Fenbridge Skills Academy, Casterbridge Engineering Centre, Casterbridge Sixth, or Casterbridge Hair and Beauty – would not be affected by separate reporting.

## Scope

The provision included within separate performance reporting would include all types of further education provision for the college's enrolled learners. That would include both on-site and off-site provision, provision delivered on behalf of the college elsewhere within the group, and sub-contracted provision (even where the subcontract is held at a corporation level). However, it would not include provision delivered by the college on behalf of another college, or on behalf of another corporation (through sub-contracting).

## Implementation

We want a robust system that is capable of securing our objectives for improving information for learners, strengthening local accountability, and supporting quality improvement. Whilst our definition of a college sets out some clear principles, these will need to be applied in a wide range of scenarios and in different circumstances. That will require an element of judgement, and the ability to apply the rules in a way that is both fair to corporations and also ensures consistent outcomes in line with the policy principles. Ultimately the ESFA will need the flexibility to make the final determination of how the rules should be applied for each corporation.

We also want to avoid a system that rewards or penalises certain structures, or introduces unhelpful incentives or constraints on corporations. Under our proposals, corporations would continue to have strong business incentives to adopt an approach to the delivery of education that best meets the needs of their learners and their organisations. We think it is unlikely that these incentives would be fundamentally altered by the introduction of separate performance reporting for colleges that are part of groups.

However, in order for the system to be robust, there also needs to be some stability. A system in which there were frequent changes to performance reporting as a result of corporations changing their approach to the institutional delivery of their provision (for example switching between the use of a single college identity and multiple college identities) would not be capable of delivering the intended benefits, particularly in terms of information for learners.

In principle, whilst we would want to avoid any unnecessary restrictions, it may therefore be appropriate to introduce separate performance reporting for a minimum period such as three years. Within that initial period, there would be constraints on the ability of corporations to change their college identities, other than in exceptional circumstances - for example a merger taking effect.

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

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

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

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

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

## 5. Multi-site colleges

Our second proposal relates to enhanced performance reporting for multi-site colleges, through the introduction of performance reporting at a delivery site level. Reporting on performance at delivery site level would be in addition to reporting at corporation, and (where applicable) college level. It would apply to all multi-site colleges, including multi-site colleges that are part of groups<sup>9</sup>. Because it would be specific to delivery at a particular site, it would cover on-site provision only.

The majority of general and specialist FE colleges, and a smaller number of sixth form colleges, have more than one delivery site. In contrast to the discussion of groups in the previous section, these local delivery sites all operate under a single college identity.

There are many different types of delivery site. They include, for example :-

- large sites with several thousand students that deliver a broad range of provision comparable to that found in a single site college;
- specialist centres focused on a specific curriculum area or areas (for example engineering, land-based provision, or academic level 3 provision); and
- locally-based learning centres providing community learning, often to relatively small numbers of learners.

Based on our analysis of information available on college websites, we estimate that there are over 750 delivery sites operated by corporations. Of these local delivery sites, around 300 are described as a “campus”.

In some cases, these delivery sites will be very close together – for example within the same urban area, or even on neighbouring streets. In other cases, they may be more distant: 30, 40 or even 50 kilometres apart. Some are the sites of former colleges where the corporation has dissolved through merger; others may be newly established sites with no history of FE provision.

Whilst there is already some disaggregation of FE performance data according to the local authority in which the learning is delivered, that does not specifically identify the site concerned; and it may reflect provision on more than one site. For those reasons, it is not transparent or accessible to learners.

In principle, separate performance reporting for delivery sites may help increase transparency for learners and for the public, and promote local accountability. It would add a further dimension to existing performance reporting: as well as being able to

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<sup>9</sup> For the purposes of this discussion, we are assuming that the proposals for separate performance reporting for colleges that are part of groups are also implemented.

scrutinise and compare quality indicators for different colleges, and (in many cases) for different types of provision, learners and other stakeholders would have better information on the quality of provision at a particular site.

## **Multi-site colleges: options**

There are a number of options for how performance reporting for delivery sites might be approached.

### **Option A: Separate performance reporting for all delivery sites**

Reporting separately for all delivery sites would provide the greatest degree of transparency for learners, for the public, and for local communities. Because it would be a universal requirement that applied to all delivery sites, it would be relatively simple to apply – it would not need an administrative process to determine whether a particular delivery site was in scope for separate reporting. However, it would entail reporting on a large number of delivery sites, many of which would be relatively small.

### **Option B: Separate performance reporting for all delivery sites over a certain size**

Applying a minimum size threshold to delivery site performance reporting would mitigate some of the potential drawbacks of Option A, and support a more proportionate approach. The threshold could be set on the basis of the number of learners at each site.

Setting the threshold at a relatively low level (e.g. 500 learners) would exclude the smallest delivery sites, whilst still ensuring that any local provision with significant scale was visible through separate performance reporting. That would help mitigate issues around proportionality, and issues around reporting on very small learner cohorts including disclosure constraints.

Alternatively, setting the threshold at a higher level (e.g. 2000 learners) would focus separate performance reporting on a smaller number of sites – for example larger campus sites that are comparable to a single site college.

Wherever the threshold was set, it is possible that changes in the number of learners from year to year could affect whether separate performance reporting was applied from one year to the next. It may be helpful to mitigate those changes, for example through use of a rolling average number of learners across multiple years, reducing the impact of year on year fluctuations.

## **Option C: Separate performance reporting for some delivery sites, based on geographical distance or travel time**

Under this option, separate performance reporting would be introduced for delivery sites that were separated by a minimum distance, or travel time, from the other delivery sites within the college.

This approach would help focus local performance reporting on cases where learners have access to only one delivery site within a realistic travelling distance. In those circumstances, enhanced local accountability through local performance reporting could play an important role in protecting learners.

Introducing a minimum distance would exclude local delivery sites that were relatively close together – for example sites that were only one or two kilometres apart within the same town. In those circumstances, local performance reporting is less likely to be effective as a tool for transparency, because learners are more likely to study at more than one site, and corporations would have more scope to move provision between different sites. Both would undermine the value of local performance reporting.

Setting a minimum distance threshold at (for example) 5km from the nearest college delivery site would address many of the issues of reporting separately on multiple sites that are close to each other, whilst also ensuring that more distant delivery sites were still subject to separate performance reporting.

Setting a higher minimum distance threshold – for example at 10km or 15km – would focus separate reporting on a smaller number of delivery sites. Those would be more likely to be in different towns, rather than within the same urban area, for example. The provision delivered on those sites is more likely to be comparable with that offered by single site college.

The relevant distance could be calculated in a number of different ways. The simplest would be the straight line distance between sites. That would be relatively simple to apply; however because it would not take into account the actual distance, time or cost of travel for learners it would only be an approximation for the impact on learner mobility. Other more detailed approaches could take into account actual distance or travel time; but these would also make the approach more complex to administer.

## **Option D: Separate performance reporting for some delivery sites, based on curriculum provision**

This option would introduce separate performance reporting for curriculum areas that are delivered at more than one local delivery site within a college. It would focus on colleges that have multiple sites offering a broad range of curriculum provision – for example larger sites that offer a similar breadth of curriculum to a single site college.



Under this option, if curriculum delivery for each subject was centralised at a single delivery site, local performance reporting would not apply to that site. Including such sites in delivery site performance reporting would not increase transparency, because it would duplicate subject-based performance data that is already publically available.

## **Evaluating the options**

All four of the options for separate performance reporting for delivery sites could potentially help achieve our policy objectives of better information for learners, strengthening of local accountability, and supporting quality improvement. In looking at the pros and cons of the different options, there are potentially a wide range of factors that should be taken into account. These include:-

### **Transparency and relevance for learners**

All the options would offer some increase in transparency – at least in respect of on-site provision. For learners following a programme of study that was delivered primarily off-site, there would be no benefits. And where off-site provision accounted for a high proportion of total provision, the benefits would be significantly reduced.

The net gain in terms of transparency would also be reduced where different types of provision are already centralised on a single site. In those circumstances, delivery site reporting would not add to information already available through existing reporting by provision type or curriculum area.

Where the number of learners at a delivery site was small, the value of separate performance reporting is likely to be mitigated by possible legal constraints on disclosure of performance data for small groups of learners. That would affect, for example, the ability to report on different types of provision (including different curriculum areas) at a local level.

Small sites are less likely to offer the broad range of provision typically found at college level. As there can be significant differences in some of the current performance measures between different types of provision (for example different subject areas), the overall performance reported for a small site is likely to be significantly influenced by the type of provision that is delivered on that site, as well as the quality. That would make it more difficult for learners to make reliable comparisons of the overall quality of provision at different sites.

### **Robustness of data**

Under some of the options discussed, the quality and robustness of local delivery site reporting may be limited by learners studying at more than one site, or moving between

sites. That is particularly likely to be the case where the delivery sites are close together, for example in the same urban area with good local transport links.

In those circumstances, it is also possible that reporting would be affected by decisions by corporations to move subject areas or types of provision between delivery sites. Whilst this would not necessarily affect the reliability of the reported performance information, it would reduce the ability to make meaningful year on year comparisons of performance for the sites affected.

As noted above, we think that it would only be feasible to apply delivery site reporting to on-site provision. Whilst both off-site and on-site provision would continue to be reported at a college level, the exclusion of off-site provision from delivery site reporting may act as a further limitation on the robustness of the data, particularly where there is movement in provision between off-site and on-site delivery.

### **Impacts on incentives**

One of the objectives for delivery site reporting is to strengthen incentives on corporations to address any local areas of weak provision which would otherwise be invisible in data averaged across all sites.

However there is also a risk of unintended impacts: for example a minimum size threshold under Option B could in some cases act as an incentive for corporations to manage their provision so that the numbers of learners at any site remained below that level. Equally, under Option D some corporations may see advantages in adopting a more centralised delivery model for curriculum delivery, to minimise the impact of local reporting.

### **Administrative simplicity**

The rules for local performance reporting need to be transparent, and as simple as possible to administer. Whilst an approach based on multiple criteria might have some benefits, these could be offset by the additional complexity. That could increase the administrative costs for both Government and corporations, particularly if (for example) there was a need for the delivery sites in scope for separate performance reporting to be revisited on an annual basis.

### **Proportionality**

The extent of any performance reporting for delivery sites needs to be proportionate to the likely benefits. Whilst the marginal cost of introducing or extending performance reporting for delivery sites through the use of ILR data is likely to be relatively low, it should nevertheless be focused as far as possible on where the benefits are likely to be most significant.

## Fit with proposals on college groups

Our discussion of proposals for separate reporting for delivery sites is based on the assumption that the proposals related to reporting for colleges that are part of groups would also be implemented. Our evaluation is therefore based on the additional benefits that delivery site reporting would bring in that context, over and above the benefits from separate reporting for colleges.

Whilst we think that is the most likely scenario, in principle it would also be possible to apply delivery site reporting on its own. In that case, many of the colleges that are part of groups would, depending on the option adopted, be reported on separately as delivery sites. It would also mean that the same rules would apply to reporting for all delivery sites, irrespective of whether those sites were colleges or not.

When assessing the pros and cons of the options identified above, it may therefore also be worth considering the extent to which these would be different if the proposals for delivery site reporting were implemented on their own.

## Multi-site colleges: your views

We would welcome your views on options A to D set out above. It may be that there is a combination of options – for example a combination of a minimum size threshold (option B) with one of the other options - that provides the best overall outcome. We think it is important that any approach is robust, transparent, and proportionate, and can be demonstrated to contribute towards our policy objectives.

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

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

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

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

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

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

## 6. Implementation

We will make a decision on the implementation of our proposals in the light of the responses to this consultation. If we decide to proceed with one or both of the proposals, our preferred approach would be to phase in the changes progressively, starting from 2018/19 data<sup>10</sup>.

When the outcome of the consultation is known, before making a decision on the timing of implementation we will review the relevant timescales, taking into account the timing of the consultation outcome and the further steps required in order to implement the proposals. That includes the time that corporations may require to put in place the relevant administrative arrangements and system changes.

Our expectation is that implementing the proposals would not require changes to the ILR technical specification for 2018/19 (first published in February 2018). But there would need to be further operational guidance on the use of specific fields, including the new campus code field. ESFA would also need to agree with each group and/or corporation how separate performance reporting would be applied in their case, in line with the policy decisions that have been reached following the consultation.

**Question 13: Subject to the outcome of the consultation, do you have any comments on our high-level approach to implementation of the proposals?**

### Implications for inspection and intervention

Our proposals would provide additional performance information that could be used for Ofsted inspection, and for intervention (including minimum standards). In turn, there may be opportunities to improve how those activities are delivered.

Ofsted are undertaking a fundamental review of their common inspection framework, with any changes being introduced from September 2019. The implications for inspection of any changes to performance information arising from these proposals will be considered as part of that review.

**Question 14: Do you have any other comments on our proposals, including any unintended consequences, not already reflected in your responses to the previous questions?**

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<sup>10</sup> The timing of publication of separate performance data will vary, depending on the duration of the relevant learning that is being reported on.



Department  
for Education

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