learning
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agency

LSDA responds

Draft Area Inspection Framework for consultation

This paper sets out LSDA's response to the consultation by Ofsted and the Adult Learning Inspectorate (ALI) on the *Draft Area Inspection Framework*, published in February 2003. The consultation document is on the internet at: http://www.ofsted.gov.uk/publications/index.cfm?fuseaction=pubs.summary&id=3186

Further information

LSDA's responses are coordinated by the Policy and Communications Unit in collaboration with relevant expert LSDA staff.

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Introduction

1 The Learning and Skills Development Agency (LSDA) is a strategic national resource for the development of policy and practice in post-16 education and training. Our activities include research, with partners, to inform the development of policy and practice for post-16 education and training. We have a clear brief to work across the post-16 sector (excluding HE) in England and Wales, providing support for colleges, work-based training, adult and community learning and schools post-16, with a particular focus on quality.

2 We are pleased to have the opportunity to respond to the specific questions posed and to comment on some general issues raised by the consultation.

General comments

3 This response draws on earlier responses by LSDA to the *Common Inspection Framework* (January 2001) and to the DfES document on *16-19 Organisation and Inspection* (October 2001). It also takes account of the recent government paper on 14-19 provision[1].

4 In our response to *16-19 Organisation and Inspection*[2] we welcomed "the extension of Ofsted and Adult Learning Inspectorate (ALI) responsibilities in area inspections to include 14-16 provision to reflect and support the development of the 14-19 curriculum" (paragraph 2). We took the view that such a move would enhance "coherent provision for this phase of learning" and "facilitate the assurance of common approaches and benchmarking of provision and services between Ofsted's inspection of learning provision and Connexions services" (paragraph 19). We also noted that the extension of the remit raised issues of the ALI's role in 14-16 provision (paragraph 20).

5 In this response we would particularly wish to draw attention to:

■ The opportunity the development offers for further integration of Ofsted and ALI inspectorates to work on a joint approach to this phase of education and training

■ The necessity of defining 'community' clearly in the context of these inspections

- The need to clarify the links between strategic planning of 14-19 provision and other initiatives (e.g. strategic area reviews; lifelong learning partnerships) which impact on this provision

- The importance of taking account of pre-14 guidance and of adult, youth and post-19 provision and guidance in the context of inspection of 14-19 provision

- The need to maintain a balance between the needs of individual learners and of employer and other national and community interests in making judgements about provision

- The need to clarify the responsibilities for action and development planning and for plan delivery in each geographical area inspected, and possibly for the creation of a strategic co-ordinating body for this purpose.

- The opportunity to pilot informal grading of provision in advance of the use of this as a benchmark in formal inspection reports.

6 We comment on these points below.

Inspection team training

7 The projected involvement of teams in Key Stage 3/4 and, as suggested below (paragraph 18), formal and informal provision made by community and voluntary services, is likely to require additional training for team members and/or the augmentation of teams with members who have experience of Section 10 inspections.

8 Current 16-19 area inspections are carried out by Ofsted and ALI teams, between whom there is variable communication at team level depending on the scale and geography of each inspection. Much depends on the lead inspector to maintain the links and draw evidence together. The conduct of the inspections has also evolved as experience has been gained. The time is opportune for a review of the process of inspection so that the principles and conduct of inspections is common not just within area inspections but across all those inspections that may contribute to judgements about area provision.

9 The intensity of inspection suggested in paragraph 9 may also lead to a requirement for an enlargement of the team available for area work.

Definition of 'community'

10 Given the emphasis in the principles of inspection (page 2), the conduct of inspectors (page 4) and in the overarching inspection question (page 6), on the primacy of the learner, the community, and the employer, it is crucial to allow time in advance of inspection to define the community (or communities) whose needs should be taken into account and identify those members of the communities who should be consulted.

11 Clearly, local government, agencies of central government (local LSCs), the Connexions service and employers represent elements of the community closely associated with the quality and outcomes of education and training. Current reports accurately reflect and evaluate the performance of these bodies.

12 Less attention is paid to the needs or views of the communities representing the learners: parents/families; ethnic and religious groups; professional associations and trade unions; statutory and voluntary organisations working with the disadvantaged; youth organisations; higher education providers receiving learners from the age range represented in the inspections. The framework for and process of inspection could helpfully allow opportunities for these voices to be identified and heard.

Links to other planning mechanisms

13 It remains unclear how area inspections will link with and contribute to Strategic Area Reviews (StAR), particularly given the key role of local LSCs in both exercises. This poses a wider question around which type of data would normally be available to inspection teams.

14 It is also unclear how Provider Performance Review (PPR) outcomes will feed into 14-19 outcomes if at all. We understand this information is currently only available to inspectors where the provider has been categorised as "Excellent" or "Serious Concerns". If PPR outcomes are to contribute in terms of data, there must be consistency in data requirements between both area and individual provider inspections. An alternative option would be to use elements of PPR data as part of the evidence drawn on for an area self-assessment submitted in advance of inspection by whoever takes the lead in these matters in each area.

15 It therefore appears to be important to identify both who takes the lead in drafting post inspection action plans and who, within the area, subsequently monitors them. It may be appropriate to identify in each area the key partners in collaborative provision and to set up some form of formal strategic partnership to manage provision and to work with the team before, during and after all relevant inspections. This issue is addressed further below (paragraph 30).

The evaluation schedule

16 We broadly agree that the evaluation schedule provides a sufficient basis for assessing the efficiency and effectiveness of the strategic development of provision for education and training for 14-19 year olds in an area, but have some reservations.

17 The draft draws heavily on the Common Inspection Framework and the parallel framework for secondary schools and helpfully continues the integration of approach to inspection of post-16 provision. The recent inclusion of Connexions inspection within area inspections also enhances the evidence available to the team.

18 In order to make a judgement of efficiency and effectiveness it will also be necessary to evaluate the contribution of providers like the adult, youth and community services, library and leisure services, the Workers' Educational Association and voluntary organisations, private schools and colleges, specific provision made by ethnic communities to supplement school or college provision. All of these can, and do, contribute both to the support of disaffected youngsters, of young people in general and to the extension of the curriculum range both pre- and post-16.

The reporting requirements

19 We have reservations about the sufficiency of the reporting requirements, as framed, to support identification of action needed to bring about improvement.

20 Greater emphasis is placed on the needs of employers and the targets of government than on the needs or wants of individuals. In question 2 of the framework, for example, it is stated that inspectors will evaluate how well the standards achieved meet the needs of employers, and government targets.

21 'Value added' is not demonstrated only by the completion of qualifications, but also by the increased confidence or motivation of learners and their retention within the education or training system. Therefore criteria need flexible interpretation according to local circumstances. When we commented (January 2001) on the original Common Inspection Framework[3] we urged that the nature of learner intake, including prior attainment and potential be taken into account, when making judgements on level of performance.

22 The draft framework states that inspectors will evaluate how well providers collaborate to increase access and participation and ensure a comprehensive range of learning opportunities at a suitable range of levels (see question 3 of the framework). This presents an appropriate opportunity to explore the nature of overall provision and should enable inspectors to take into account informal provision, such as that indicated in our comments above (paragraph 18).

23 In question 2 of the framework (How well do learners achieve?), the judgements inspectors will consider are restricted to literacy and numeracy. This is expanded in question 4 of the framework (How effectively does the curriculum support progression to further and higher education, training and employment?) and also in question 5 (How effective are teaching, learning and training?) to include ICT. However, there is no reference to the so-called 'soft' key skills, to which employers often give equal emphasis and which are of importance for successful progression to both employment and higher education.

24 Although issues of race and disability are touched on in question 8, and in Annex A (the Report Schedule), earlier questions (eg. 3), which relate to access and provision, focus only on the 'vulnerable and disaffected'. Given the legislative context in which education and training providers operate, more specific prompts relating to issues of ethnicity, race and disability may be appropriate to ensure these are given due attention.

The criteria for and timing of reinspection

25 We have some concerns about the criteria for and timing of reinspection for unsatisfactory provision

26 Appropriately, the only criterion is that an aspect of provision 'does not reach a satisfactory standard'. The response of the local LSC/LEA will presumably be included in the overall action plan following inspection. Some guidance on the format of the plan (for example the inclusion of timescales, costs, who is responsible for actions, performance criteria against which to measure progress) may be appropriate.

27 There should be some flexibility in the timescale for re-inspection (ie. not just a normal maximum time within which it will take place). For example, two years may be a long time to correct an urgent omission in the area's strategy (eg. adequate information provision for learners on their next steps) but a short time within which to amend the organisational structure for curriculum delivery. Re-inspection, which could cover both serious weaknesses and areas identified for development, may therefore need to be a series of visits over several years.

28 The responsibility for local action plans and their subsequent monitoring from within the geographical area inspected, also needs clarification. No timescale for the initial submission of an action plan is indicated nor whether there will be consultation on the draft. It would also seem appropriate for providers to be automatically represented at feedback meetings, given their role in partnerships and curriculum delivery and the devolution of budgets for these purposes.

29 There may also be a need for the co-ordination of action plans deriving from differing inspection or evaluation regimes. Issues may be identified in an institutional inspection, or through a process like the evaluation of readiness for an Investors in People award, or a visit to a Learning Partnership, that overlap with issues for improvement arising from an area inspection. Co-ordination of response and of funding will be necessary to avoid duplication and confusion.

30 The quality and coherence of 14-19 provision would be supported by a clearer locus of responsibility for strategic planning and coordination in a geographical area. There may therefore be a need for more formalised arrangements to be established in the form of a strategic coordinating body. Such a body could be responsible for both preparing a self-assessment report and managing and monitoring follow-up action.

The role of self-evaluation in supporting the documentation for inspection

31 In our response (November 2001) to *Improving Inspection-Improving Schools[4]*, we said that we believed that inspection "should aim to promote the culture and practice of self-evaluation".

32 This remains our view. Self-evaluation is an essential part both of area and institutional planning and development and of evidence provision for inspection and other forms of monitoring and evaluation. Unfortunately, different types of self-evaluation occur within 14-19 providers. Schools now complete forms S1-4 as part of pre-inspection evidence, but vary in their use of self-assessment at other times. Colleges and training providers are subject to the annual self-assessment report procedure.

33 The emphasis placed on self-assessment also varies during inspection. As a broad generalisation it is beginning to assume a greater importance with schools, but from a basis of little experience in using such techniques. Colleges have more experience but, since the demise of the college inspector role, see the SAR as less central to inspection.

Taking account of changes that have occurred since individual provider inspection took place

34 If much of the evidence regarding the quality of education and training is retrieved from the inspection of providers before an area inspection takes place, the timescale within which evidence from a prior inspection is admissible should be established. We would suggest one academic year on the grounds that evidence based on cohorts at an earlier stage in their education or training may not be representative of current performance in the institution.

35 The rapidity of curricular change may also lead to the use of data that is not compatible with that gathered during the area inspection. Also, it is possible that this would not be available in some cases, as for example only in the last two years have full inspections of sixth forms taken place or the current post-16 framework been in use.

36 We believe all institutions should have the opportunity to provide a statement of activity and change since inspection, particularly in relation to post-inspection action plans. It is assumed the latter will be available to area inspection teams. Data for each institution should obviously relate to the most recent round of assessment/examination that has occurred. All institutions should be visited for discussion on these changes. They should have the option of a 'light touch' inspection of nominated provision should they feel significant change has taken place. It is also assumed that the current practice of pre-inspection briefings of all providers and interviews with representatives of each sector of providers will continue.

The publication of grades to summarise the evaluation relating to each key question

37 In our view, the absence of grading in the 16-19 inspections means there is a lack of evidence on which to base public reporting of grades. We would suggest that grades agreed by the team be used initially in oral feedback, for discussion with and guidance for those inspected, in order to arrive at a consensus about:

■ the grades themselves, and

■ whether their publication would be helpful to future planning in the area concerned.

38 Grading would be a new activity on the part of inspectors and may represent a training need.

39 We would reiterate a point we have made in previous responses, that constructive feedback, at the individual, institutional or area level, is necessary if inspection is to fulfil its improvement function. In our response to *Improving Inspection, Improving Schools* in November 2001[5] we took the view that "gradings alone are of limited value" but that "indicative grade profiles, accompanied by explanatory comments on strengths and weaknesses, may, however, be helpful for self-evaluation purposes". We believe this viewpoint is equally applicable in the context of the current consultation.

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[1] *14-19: opportunity and excellence*, DfES, January 2003

[2] LSDA's response to the DfES document *16-19 Organisation and Inspection* (2001) can be found on the internet at http://www.lsda.org.uk/pubs/dbaseout/download.asp?code=polresp16-19

[3] LSDA's response to the *Formal Consultation on the Common Inspection Framework* (2001) can be found on the internet at http://www.lsda.org.uk/files/pdf/commonin.pdf (see paragraph 10).

[4] LSDA's response to *Improving inspection, improving schools* (Ofsted, 2001) can be found on the internet at http://www.lsda.org.uk/files/pdf/C1280.pdf

[5] As note 4.