Education inspection framework 2019: inspecting the substance of education

Consultation document

# Proposals

## Framework proposals

These proposals represent an important evolution of current inspection arrangements. The new framework aims to focus inspection judgements and the criteria that underpin them on the quality of education that providers offer. The sections that follow illustrate how we propose to do this.

### Proposal 1

We propose the introduction of a new ‘quality of education’ judgement built around our working definition of the curriculum. It will focus on a provider’s educational intent, implementation and impact. Inspectors look at teaching, assessment, attainment and progress under the current inspection framework, and they will continue to do so, but these considerations will contribute, viewed in the context of the provider’s curriculum, to a single quality of education judgement. In short, we propose to take a holistic approach to considering the quality of education rather than artificially separating the leadership of the curriculum from teaching, and separating teaching and the use of assessment from the impact this has on the outcomes that learners achieve. This will de-intensify the inspection focus on performance data and place more emphasis on the substance of education and what matters most to learners and practitioners.

### To what extent do you agree or disagree with the proposal to introduce a ‘quality of education’ judgement?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree | Don’t know |
| [ ]  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  |

|  |
| --- |
| Comments:In general, we agree that the “quality of education” judgement is a sensible approach, and has been explained clearly in the inspection handbook. Ofsted has, rightly, not dictated what it sees a “perfect” curriculum; however, this lack of clarity could potentially lead to inconsistency and confusion, both for schools and for Ofsted Inspectors. In theory this sounds like a positive move as it takes the focus away from data alone; the potential issues arise with the subjectivity of how a good curriculum is interpreted and the pressure on schools to explain and evidence the intent, implementation and impact of their own curriculum. Despite assurances from Ofsted, the huge focus on curriculum delivery could lead some schools to try to second-guess a preferred curriculum, and they may be encouraged in this belief by educational consultants and providers. Even worse, some schools might be pressured into changing their curriculum in order to meet perceived requirements in the new framework.There is a danger that the focus on a curriculum that has not been prescribed may serve to create, once again, a stylistic and subjective approach to inspections. Although the current focus on data and attainment has its challenges, such as putting pressure on schools in many cases to narrow the curriculum and teach to the test, what the current framework does is iron out the opinions of styles of teaching by inspectors sometimes experienced in previous inspections. One headteacher noted that *“I once heard an inspector say, "We have been told to leave our opinions on HOW to teach at the door of the school before entering". Despite a rigorous process, I am sure, of training of inspectors to ensure quality assurance, one can never ensure that all personal beliefs of all inspectors are aligned... I am concerned that these new proposals open the doors, once again, to opinionated inspectors who make subjective judgements. Also, some of the language used in the handbook appears to be rather entrenched in supporting subjective views rather than "professional judgements".”*Schools need to be very confident that the lack of determination about the curriculum will not lead to confusion, subjectivity and inconsistency in inspection, and that Ofsted inspectors are clear about the expectations of this judgement. In addition, schools need to know if there will be a greater focus on lesson observations and book scrutiny, to evidence the quality of education. Paragraph 161 asserts that some schools narrow the curriculum available to schools. We are concerned that Ofsted needs to recognise and take into account the current funding and recruitment pressures experienced by schools in both primary and secondary sectors, which may limit the possibility of providing a broad and specialised curriculum. The context of each school must be taken into account when determining every judgement. The scope of the “quality of education” judgement is huge and puts great pressure on schools.The term “cultural capital” appears to be extremely subjective, and suggestions from DfE (for example in the recently published “Activity Passport”) focus particularly on apparently middle-class and privileged values. We believe there needs to be a much clearer definition of the purpose and scope of “cultural capital”, or else there is a danger of this judgement becoming both subjective and political, and one that will disadvantage schools that have a significant proportion of less privileged pupils. Paragraph 162 strongly asserts the need for secondary schools to deliver the EBACC. We are concerned that this politicises the Ofsted framework. EBACC is a current educational delivery approach promoted by the DfE, and should not be seen as a definitive educational answer. This entirely contradicts the apparent autonomy of the Ofsted approach to curriculum delivery.Paragraph 182 discusses how judgements are reached in terms of intent, implementation and impact of the curriculum. There is no information about the weight or value of each stage, and again this judgement could become inconsistent and subjective.  |

Proposal 2

We propose to judge ‘personal development’ separately from ‘behaviour and attitudes’ to enhance the inspection focus on each and enable clearer reporting on both. This approach recognises the very different elements in focus. We believe that the behaviour and the attitudes learners of all ages bring to learning is best evaluated and judged separately from the provision made to promote learners’ wider personal development, character and resilience.

### To what extent do you agree or disagree with the proposed separation of inspection judgements about learners’ personal development and learners’ behaviour and attitudes?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree | Don’t know |
| [ ]  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  |

|  |
| --- |
| Comments:We agree in principle with the separation of these two inspection judgements as to some extent they contradict one another. However, we have some reservations:If the two judgements are separated, with more descriptors, there will be a greater onus on schools to collect evidence as to how they are meeting these expectations. It is also critical that Ofsted inspectors have a clear and consistent approach to “good” behaviour. Are the two judgements regarded as equal, or weighted in any way?Paragraph 201 of the Handbook recognises that the input of a school in respect of a child’s personal development is limited (and is just one part of their overall life experience) and may not be measurable while that child is still at school. This recognition is important (and is welcomed) and must feed consistently into inspection. There needs to much clearer information and expectations about the evidence that schools are expected to offer to demonstrate good (or better) personal development of pupils. |

## Early years (registered provision)

We know that, to make a real difference to a child’s life, high-quality education and care between birth and the age of five are crucial. These early years should provide the foundation of a happy, successful future. The ‘Statutory framework for the early years foundation stage’ (EYFS) sets out the education and care standards that all early years providers must meet to ensure that children, from birth to five, learn and develop well and are kept healthy and safe. Once a provider is registered on the Early Years Register, Ofsted carries out regular inspections to evaluate the overall quality and standards of the early years provision in line with the principles and requirements of the EYFS. This will not change, but we propose to put a greater emphasis on the curriculum. It should be noted that early years in schools and maintained nursery schools are inspected under the schools handbook.

|  |
| --- |
| The quality of education (educational programmes)1. The educational programmes (EYFS) provide the curriculum framework that leaders build on to decide what they **intend** children to learn and develop.
2. Leaders and practitioners decide how to **implement** the curriculum so children make progress in the seven areas of learning.
3. Leaders and practitioners evaluate the **impact** of the curriculum by checking what children know and can do.
 |

We have seen an industry develop around assessment and tracking of young children. What children learn is too often coming second to the delivery of assessment information. The education inspection framework will put more emphasis on the quality of education and care. It will ensure that we consider children’s experiences and how they are being developed, alongside assessments.

We want to make sure that the curriculum for children with particular needs, such as those with high levels of special educational needs and/or disabilities (SEND), is ambitious and meets their needs from birth to the age of five. We want to find out how leaders make sure that these children have full access to their entitlement for early education.

### Proposal 3

We want to ensure that the education inspection framework 2019 judgements (see section above and para 131 in the EY handbook]) are appropriate for the range of early years settings.

**To what extent do you agree or disagree that the judgements will work well for:**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | Strongly agree | Agree | Neither agree or disagree | Disagree | Strongly disagree | Don’t know |
| Childminders  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  |
| Childcare on non-domestic premises  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  |
| Childcare on domestic premises  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  |
| Childcare settings that offer care exclusively before and after school  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  |

|  |
| --- |
| Comments: |

|  |
| --- |
| **Please use this box to record any additional comments in relation to the detail set out in the early years draft inspection handbook**. |

## Maintained schools and academies

### Proposal 4

Since their introduction in 2015, section 8 inspections of good and non-exempt outstanding schools have been valued by the sector. The changes made to the operation of these inspections from January 2018 have been welcomed by most schools inspected since then. The purpose of a section 8 inspection of a good school is to confirm that a school remains good. This will not change. However, as we have stated previously, the new education inspection framework represents an evolution in what it means to be a ‘good’ school.

We have set out within the schools handbook (paragraphs 270-282) the fact that a section 8 inspection of a good school will focus on particular aspects of the school’s provision, as a subset of the full education inspection framework criteria. These are drawn principally from the quality of education judgement, but also include specific elements of pupils’ behaviour, personal development and safeguarding.

Currently, section 8 inspections of good schools (or ‘short inspections’) last for one day. We want to ensure that there is opportunity to gather sufficient evidence while on inspection to confirm that a school remains good under the new criteria. Therefore, we are proposing to increase the time for which the lead inspector is on site to two days.

### To what extent do you agree or disagree with the proposed focus of section 8 inspections of good schools and non-exempt outstanding schools and the proposal to increase the length of these inspections from the current one day to two days?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree | Don’t know |
| [ ]  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  |

|  |
| --- |
| Comments:The first question from our schools is: **why** this change? The current strategy of one-day Section 8 inspections of “good” schools is working well.(More than) doubling the length of a section 8 inspection of good and non-exempt outstanding schools totally contradicts the recent strategy of having full inspections for schools that are causing concern at any level, and operating shorter, “light touch”, inspections of good schools. Ofsted should never underestimate the pressure and stress that any inspection (and waiting for any inspection) brings to a school, whatever their pupil outcomes. This flies in the face of the recent approach that trusted good schools to continue to deliver effective teaching and leadership. In reality, the inspection length of a section 8 will now increase from one day to 2 ½ days, as the proposal is to include onsite pre-planning for all inspections. This adds to the time and workload for all schools. It is also not clear whether at some point during this 2+ day inspection, if a school might be at risk of being judged inadequate, this could then convert to a full section 5 inspection, and potentially extend to 3 – 4 days. This (if adopted) needs to be much clearer in the framework. We suggest that if Ofsted are determined to increase the length of a section 8 inspection for good schools, it should revert to the previous option of converting “immediately” to a section 5 when there may be a question over a “good” outcome. This would mean that these schools are not obliged to experience a 2 ½ day (section 8) inspection followed by another full inspection within 2 years. The current system means that schools are on continuous “Ofsted watch” even when they are judged to be good. The disparity between those schools, and schools that are exempt because they have been judged to be outstanding (however many years ago) is enormous and unfair. However, it is difficult to understand how Ofsted believes that this proposal is financially sensible and viable. If this is introduced there should, at least, be consideration of the size of the school – unreasonable to have a “one size fits all” approach. There should be a proportionate inspection time depending on the size of the school.We believe that a more pressing issue is to focus on the need to ensure that “outstanding exempt” schools are inspected, either under S8 or S5, to confirm that they continue to meet this grading. In particular, it is illogical (and unsafe?) that “outstanding exempt” schools are not inspected regularly to ensure that their safeguarding arrangements meet the standards that all other schools are expected to achieve.It is arguable whether ANY school should be exempt from inspection – given changes in cohort and leadership over time, any school can and will vary in how it performs, and data alone should not determine whether it is subject to inspection. |

### Proposal 5

In addition to the wider education inspection framework proposals we are introducing, we also propose a new approach to how our inspectors prepare for and begin inspections. This is in response to feedback that initial contact can be data-driven and not allow schools to communicate fully with inspectors.

We propose the introduction of on-site inspector preparation for all inspections carried out under section 5 and section 8 of the Education Act 2005. Currently, inspectors carry out pre-inspection preparation remotely on the day prior to on-site inspection. We propose that, from September 2019, this preparation takes place at the school on the afternoon before the inspection, enabling inspectors and leaders to carry out preparation collaboratively wherever possible.

On-site preparation will allow for better communication between the lead inspector and the school, allowing the school a clear role in preparation work. It will help to reduce the burden on schools of making logistical arrangements on the morning of the inspection and providing documentation. It will provide more time to establish good, professional relationships between school leaders and the lead inspector.

We propose that Ofsted will provide formal notification of the inspection no later than 10am on the day before the inspection. We then propose that the lead inspector will arrive on site no earlier than 12.30pm on that day. The lead inspector will use this time to talk with senior leaders in order to gain an overview of the school’s recent performance and any changes since the last inspection.

Conversations will focus particularly on how the school has built on its strengths, what weaknesses leaders have identified and what action they have planned or have in train to address those weaknesses. It will also be an opportunity to make practical arrangements, including about the documentation or other evidence that inspectors will need to see in the course of the inspection. Inspectors will complete their on-site inspection preparation and leave the school premises by **no later than 5pm** on the day before the inspection starts. Paragraphs 51 - 56 of the school inspection handbook set out in more detail what we expect on-site preparation to cover.

### To what extent do you agree or disagree with the proposed introduction of on-site preparation for all section 5 inspections, and for section 8 inspections of good schools, on the afternoon prior to the inspection?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree | Don’t know |
| [ ]  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  |

|  |
| --- |
| Comments:We strongly disagree with the proposal for the pre-planning meeting to be on the school site, thereby reducing the notice period of inspection, for a number of reasons, both practical and professional. These include (in no particular order):The headteacher may be off-site, teaching or attending meetings that they cannot reschedule (in particular, child protection meetings and reviews). As always, Ofsted states that if the headteacher is unavailable the Lead Inspector will speak to/meet with the most senior leader. However, this places a school at an unreasonable disadvantage, and does not give it a chance to show its real capability. Headteachers, as lead professionals, should never be in a position where they feel that they cannot be out of school in case this makes their school vulnerable in inspection. The impact is greatest on a small school, where headteachers and senior leaders often have teaching commitments, which will be difficult and costly to cover at short notice, and may have an immediate and detrimental impact on the learning and experience of pupils. It is often difficult to find supply cover due to shortage of suitable teachers, and this will be even more of a challenge if that process needs to be done after 10.00 am (following a call from the Lead Inspector). Deputy headteachers, senior leaders and subject leaders will almost always have a teaching commitment, whatever the size of the school, and if they are required to take part in the pre-planning meeting, this will require reorganisation at a cost and constraint to the school. Some schools, in particular small schools, may be severely restricted for space and may physically have nowhere to situate a Lead Inspector, particularly if the headteacher is also themselves trying to prepare for inspection, as dictated by the handbook. The 2 ½ hour notification period, followed by the pre-planning meeting, gives the headteacher and senior leaders (and governors) very little time to prepare for inspection. An important part of this is reassuring and supporting teachers and staff (and pupils!) in the school. If this proposal is adopted, headteachers may need to ask (or hope that) teachers and staff will stay in school after 5.00 pm to prepare for inspection. This counters the apparent concern from Ofsted (and DfE) about staff workload, and makes preparation for an imminent inspection unpredictable, stressful and inconsistent (particularly for the headteacher). One headteacher asked: *“Are they trying to catch us out?”* This approach does not foster a positive and collaborative relationship between school staff and the Ofsted inspection team.The proposed framework stresses that the pre-planning meeting is about collaboration between Lead Inspector and the school. In our experience, if the Lead Inspector picks up concerns when he or she scrutinises the IDSR, website and other available information remotely from the school, that collaborative discussion currently happens during the initial phone call and during inspection. If this pre-preparation and analysis is undertaken thoroughly and professionally, and leads to appropriate and searching questions during inspection, there should be no reason for it to take place in advance of the inspection.The proposed framework implies that the pre-planning meeting is not part of the actual inspection. In reality, this is unrealistic and disingenuous – we believe that the moment an inspector arrives on site they will start to make judgement about that school, and arguably would not be inspecting properly if they did not do so. Therefore, Ofsted should be honest about the purpose and impact of this proposal and either extend all inspections to 2 ½ days, or continue the current (and preferable) system of having remote pre-planning.It is not at all clear whether no-notice inspections would include this onsite pre-planning time. If so, this would offer even stronger logistical challenges, and it needs to be made clear in the handbook. *In the words of one headteacher: This would only be acceptable if the school was given 24 hours’ notice of the afternoon arrival. It is logistically challenging for schools to manage this. For example, I am head teacher of a small primary school which means I am the head, SENDCo, and often teach. Imagine one day, before 10:00am, I receive a call to say Ofsted are arriving that afternoon. I would have to organise supply cover to release myself within two hours; I would have to think outside the box as to where to place the inspector as the only private space is the head teacher's office. The pressure of NO NOTICE on staff would be huge and therefore unacceptable. When people know Ofsted are on their way, they start to worry and place pressure on themselves. This is unavoidable- it is human nature when so much is at stake. Add to this, the thought that they have no time that day to mentally prepare themselves... I believe this to be unacceptable and to increase the pressure and stress of staff, not to alleviate it.*The Education Inspection Framework focuses a great deal on the impact of staff workload. This proposal contradicts that apparent concern, and certainly does not in any way take into account the impact on headteachers and senior leaders.We believe the current system of an initial telephone call to discuss the inspection, off-site preparation by the Lead Inspector, and start of inspection the following day works well and should not be changed.  |

### Proposal 6

The recent Teacher Workload Advisory Group report[[1]](#footnote-2) noted that ‘time associated with data collection and analysis… is most frequently cited as the most wasteful due to a lack of clarity amongst teachers as to its purpose’.

Ofsted is committed to ensuring that our inspection work does not create unnecessary work for teachers, and as such we propose that inspectors will not use schools’ internal performance data for current pupils as evidence during an inspection. This is because:

* internal data for current pupils has its limitations, and inspectors will not be able to assess whether the data is an accurate and valid representation of pupils’ learning of the curriculum
* inspectors will gather direct evidence of the quality of education in schools

inspectors will have meaningful discussions with leaders about how they know that the curriculum is having an impact.

Inspectors will, however, ask schools to explain why they have decided to collect whatever assessment information they collect, what they are drawing from this information and how that informs their curriculum and teaching. We believe that this will help to reduce unnecessary workload for teachers; we do not believe that it will have a negative effect on our ability to judge effectively the quality of education in a school.

### To what extent do you agree or disagree with our proposal not to look at non-statutory internal progress and attainment data and our reasons why?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree | Don’t know |
| [ ]  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  |

|  |
| --- |
| Comments: *If you disagree, please be specific about the types of data that you think inspectors should consider.*We believe thatinspectors should be open to reviewing and discussing the internal performance data that a school is using. Avoiding this discussion may make it difficult for a school to explain and show the progress and pace of pupils’ pace and improvement. Internal data can be a useful way of showing the progress of current pupils. In a school that is rapidly improving, internal data provides the story of a journey. Other situations where the use of internal data is essential include:* Schools who have poor end of Key Stage data will want to share internal data that shows that improvements are being made;
* Schools with significant turbulence of pupils where external data does not reflect the reality of pupil achievement and progress;
* Junior schools that have produced a baseline of their Year 3 pupils;
* Schools where a new headteacher is in post;
* Being able to show the progress of children with special educational needs, or those eligible for pupil premium funding;
* Attendance and behaviour information and data
* “Soft” data about staff wellbeing.

Refusing to consider internal data also focuses too much emphasis on external test data. A number of headteachers argued: *“It is an essential part of understanding how much the school knows about the position of the pupils’ learning and next steps. How can Ofsted make judgements about the effective quality of education without this?”*In addition, it is essential that Ofsted is judging the quality of education for the pupils currently in a school, rather than solely focusing on historic data and experience of pupils who may now have left; refusing to discuss in-school data makes this more likely. We agree to some extent that there is currently too much pressure on schools to provide frequent and regular internal data, ironically largely driven by DfE and Ofsted demands over the last few years. This has had an impact on the workload of all staff, including the headteacher and senior leaders. However, we are not sure that Ofsted should be so prescriptive about, for example, the number of data collection points during a year. We want inspectors to be open to reviewing internal performance data if this is provided by a school.  |

|  |
| --- |
| **Please use this box to record any additional comments in relation to the detail set out in the draft school inspection handbook**We welcome the suggestion that staff, as well as governors, should be informed of the outcome of an inspection immediately following the feedback meeting, subject to them being awarethat the judgement might change. It has never felt logical, or fair, that staff (whose livelihood may depend on the inspection outcome) should not be trusted to know the expected judgement, while governors are entrusted with this information**.**  |

## Non-association independent schools

All independent schools are inspected at the direction of the DfE, which is the registration authority for independent schools. In standard inspections of non-association independent schools, Ofsted assesses compliance with the independent school standards (ISS) and makes graded judgements under the inspection framework. This model will continue when the new education inspection framework is introduced in September 2019.

### Proposal 7

Some non-association independent schools offer a specialist curriculum and Ofsted recognises their autonomy to do so. For example, some schools offer a specialist faith-based curriculum, while others offer a specialist education in the performing arts. Inspectors will assess a school’s entire provision, including any specialist provision offered, when assessing compliance with the ISS and when reaching judgements under the education inspection framework in the following judgement areas: overall effectiveness; behaviour and attitudes; personal development; and leadership and management.

When reaching a judgement under the new quality of education judgement area, the non-specialist curriculum will normally be inspectors’ primary source of evidence. It is important that, where schools offer a specialist education, pupils also study a broad, rich curriculum alongside it. This is supported by Ofsted’s research, and is a requirement of the ISS.

However, where a school chooses to deliver a substantial number of the required subject areas[[2]](#footnote-3) through the specialist curriculum (for example through faith-based content or other forms of immersive study), or where there is insufficient evidence from the non-specialist curriculum that the quality of education criteria are met, inspectors will consider evidence from the specialist curriculum in arriving at their judgement.

### To what extent do you agree or disagree with the proposal that inspectors should normally use the non-specialist curriculum as their primary source of evidence in assessing the extent to which the school meets the quality of education criteria?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree | Don’t know |
| [ ]  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  |

|  |
| --- |
| Comments: |

### Proposal 8

Currently, where the DfE commissions Ofsted to conduct additional inspections of independent schools, such as progress monitoring or emergency inspections, Ofsted checks whether the ISS are being met but does not make new graded judgements about the school. As a result, a school retains the judgements from its most recent full standard inspection, even where it has improved and is now meeting the standards, or has declined and is no longer meeting them. A new graded judgement is not provided until the school’s next standard inspection.

We are aware that some schools may wish new inspection judgements to be made more quickly than they currently are, to reflect their improvement. We are also aware that when a good or outstanding school is no longer meeting the standards but retains its most recent standard inspection judgements, this can be misleading for parents and others.

To provide parents, school leaders and the DfE with better information, we are proposing to recognise and acknowledge sooner where schools have improved or declined, for example by bringing forward a standard inspection.

### To what extent do you agree or disagree that where non-association independent schools have been found to improve or decline at an additional inspection, Ofsted should provide up-to-date judgements about the school’s current performance?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree | Don’t know |
| [ ]  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  |

|  |
| --- |
| Comments: |

|  |
| --- |
| Please use this box to record any additional comments in relation to the detail set out in the non-association independent schools draft inspection handbook. |

## Further education and skills

The further education and skills sector is broad and diverse, with providers that deliver a wide range of education and training provision in different settings. We have drafted the proposed education inspection framework and handbook to be adaptable for all the types of provider that we inspect.

Under the common inspection framework, we currently inspect all publicly funded provision. We grade, and report specifically on, six different types of education and training provision:

* 16−19 study programmes
* adult learning programmes
* apprenticeships
* traineeships
* provision for learners with high needs

full-time provision for 14−16 year olds.

### Proposal 9

We believe that it would make our inspections and reports more coherent and inclusive if we were to reduce the types of provision that we grade and specifically report on as follows:

|  |  |
| --- | --- |
| Proposed education inspection framework types of provision | Current types of provision |
| Education programmes for young people | 16−19 study programmes, including:* academic, technical and vocational study programmes
* study programmes for those with education, health and care plans, aged 16 to 24 (and those with high needs)
* 16−19 traineeships
* full-time provision for 14−16 year olds.
 |
| Apprenticeships | Apprenticeships at levels 2 to 5, whether frameworks and standards, levy or non-levy funded. |
| Adult learning programmes | Adult learning programmes19−24 traineeships. |

We will cover education and training for people with SEND and/or high needs thoroughly and appropriately within the relevant type of provision rather than separately. We consider that this will ensure that they are fully and properly represented and not marginalised or isolated within the inspection and report.

T-levels, a major reform of technical education at level 3, will be introduced from September 2020. That will take place after the beginning of this new framework. We intend to review how we should best integrate the coverage of T-levels into this framework closer to the time of their introduction and will consult further on this in due course.

### To what extent do you agree or disagree that the proposal to reduce the types of provision we grade and specifically report on will make our inspection reports more coherent and inclusive?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree | Don’t know |
| [ ]  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  |

|  |
| --- |
| Comments: *If you disagree, are there any specific areas you are concerned about?* |

### Proposal 10

Under the current common inspection framework, Ofsted carries out short inspections of most good further education and skills providers. This happens within five years of the previous inspection. Some good providers instead receive a full inspection for reasons of risk. We intend to continue with short inspections for most good providers on the same basis. However, given greater focus on the quality of education in the education inspection framework 2019, we believe we need to change the way we carry out the short inspection of good providers in some respects.

Under our current methodology, we undertake to confirm that a provider remains good by exploring a number of lines of enquiry that differ for each provider. As we are introducing a new inspection framework with a focus on the quality of education and the curriculum, we propose introducing an approach that focuses on the quality of education and training, safeguarding and effective management, and that this should be the same for all providers. We are continuing to pilot our proposed approach. The proposed areas we are piloting are:

* Is the quality of education/training good?
* Has the provider addressed the areas for improvement/next steps identified in the last inspection report well?
* Are the provider’s safeguarding arrangements effective?
* Are careers education and guidance of a good quality?

Has the provider managed and implemented changes to provision effectively since the last inspection?

We will refine the above areas based on our pilot activity and from feedback following this consultation. In order to ensure that short inspections are planned effectively with providers, and to ensure coverage, we are proposing to increase the time the lead inspector, or in the case of larger providers, the lead inspector and another member of the inspection team, spend on site. We propose that the lead inspector, or in larger providers, two inspectors, arrive at the provider on the day following notification and complete the planning for the inspection on site with the provider (see paragraphs 126-133 of the draft further education and skills inspection handbook). They would then start inspection activity prior to the full inspection team arriving the following day.

### To what extent do you agree or disagree with the proposed model for short inspections?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree | Don’t know |
| [ ]  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  |

|  |
| --- |
| Comments: |

### Proposal 11

We are proposing to extend the timescale within which we should inspect providers judged to require improvement from ‘normally 12 to 24 months’ after the last inspection to ‘normally 12 to 30 months’ after the last inspection. This will provide greater flexibility to give providers more of an opportunity to improve to good while still allowing some providers to be re-inspected earlier if they are ready for it. A provider that has been judged as requires improvement would continue to receive a monitoring visit between inspections.

### To what extent do you agree or disagree that the timescale within which providers that are judged to require improvement receive their next full inspection should be extended from ‘12 to 24 months’ to ‘12 to 30’ months’?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree | Don’t know |
| [ ]  | [ ]  | [ ]  | [ ]  | [ ]  | [ ]  |

|  |
| --- |
| Comments: |

### Inspection of colleges at campus level

Ofsted has, for some time, intended to introduce grading and reporting on individual colleges within college groups as part of the overall inspection of the college group, subject to receiving the funding to be able to do this.

Since the disaggregated data that will make it possible to determine what provision is delivered by which college will not be fully available until 2021, it will not be possible to introduce that for the beginning of this framework. We will therefore consult further on this in due course. We will, in the meantime, look at ways in which we can better differentiate the relative performance of individual colleges within inspection reports of college groups.

|  |
| --- |
| Please use this box to record any additional comments in relation to the detail set out in the further education and skills draft inspection handbook. |

# The consultation process

1. We welcome your responses to this consultation paper. The consultation opens on 16 January 2019 and closes on 5 April 2019.
2. The information you provide us with will inform our consideration of changes to the education inspection framework from September 2019.
3. We will publish a response to the consultation in May 2019.

**Sending back your response**

1. There are three ways of completing and submitting your response:
* **Online questionnaire**

Complete and submit the response form online: <https://www.smartsurvey.co.uk/s/EIFConsultation/>

* **Complete and email**

Complete the questions in this Word document and email it to inspection.consultation@ofsted.gov.uk with the consultation name in the subject line.

* **Print and post**

Print this Word document and fill it in by hand. Please post it to:

EIF Programme Team

Ofsted

Clive House

70 Petty France

London

SW1H 9EX

# About you

**Confidentiality**

The information you provide will be held by us. It will only be used for the purposes of consultation and research to help us to become more effective, influence policies and inform inspection and regulatory practice.

We will treat your identity in confidence, if you disclose it to us.

Are you responding on behalf of an organisation?

Yes [ ]  please complete Section 1 and the following questions

No [ ]  please complete Section 2 and the following questions

**Section 1**

If you would like us to consider publishing the views of your organisation, please indicate this below.

Organisation:

**Section 2**

Please tell us in which capacity you are completing this survey (please choose one option):

|  |  |  |  |
| --- | --- | --- | --- |
| Teacher | [ ]  | Local government representative  | [ ]  |
| Governor  | [ ]  | Mayoral or combined authority representative | [ ]  |
| Headteacher/Principal  | [ ]  | A registered early years group provider | [ ]  |
| Other school staff  | [ ]  | A registered early years group provider (before and after school care **only**) | [ ]  |
| Pupil/student | [ ]  | A registered early years childminder | [ ]  |
| Multi-Academy Trust representative | [ ]  | An early years provider run directly by a school | [ ]  |
| Parent/carer | [ ]  | Leader/manager of a further education and skills provider or college | [ ]  |
| Teacher/trainer of a further education and skills provider or college | [ ]  | Other employee of a further education and skills provider or college | [ ]  |
| An adult learner/student | [ ]  | An employer with an ESFA or apprenticeship levy training contract | [ ]  |
| A member of the public | [ ]  | An employer without an ESFA or apprenticeship levy training contract | [ ]  |
| Representative group or union representative  | [ ]  | Proprietor of an independent school | [ ]  |
| Prefer not to say  | [ ]  | Other, please tell us:       |

If you are responding in a professional capacity, please specify where you work:

|  |  |  |  |
| --- | --- | --- | --- |
| A maintained primary school | [ ]  | A primary academy  | [ ]  |
| A maintained secondary school | [ ]  | A secondary academy  | [ ]  |
| A maintained nursery school | [ ]  | A non-association independent school |  |
| A maintained special school  | [ ]  | An early years provider | [ ]  |
| A general FE/tertiary college | [ ]  | A not-for-profit organisation | [ ]  |
| A sixth form college | [ ]  | An independent specialist college | [ ]  |
| A local authority | [ ]  | A higher education institution | [ ]  |
| An independent learning provider | [ ]  | A free school | [ ]  |
| A non-maintained special school | [ ]  | Other, please tell us       |
| Prefer not to say | [ ]  |

# What did you think of this consultation?

One of the commitments in our strategic plan is to monitor whether our consultations are accessible to those wishing to take part.

**How did you hear about this consultation?**

* [ ]  Ofsted website
* [ ]  *Ofsted News*, Ofsted’s monthly newsletter
* [ ]  Ofsted conference
* [ ]  Twitter (@ofstednews)
* [ ]  Another organisation (please specify, if known)
* [ ]  Other (please specify)

**Please tell us what you thought of this consultation by answering the questions below.**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Agree | Neither agree nor disagree | Disagree  | Don’t know |
| I found the consultation information clear and easy to understand. | [ ]  | [ ]  | [ ]  | [ ]  |
| I found the consultation easy to find on the Ofsted website. | [ ]  | [ ]  | [ ]  | [ ]  |
| I had enough information about the consultation topic. | [ ]  | [ ]  | [ ]  | [ ]  |
| I would take part in a future Ofsted consultation. | [ ]  | [ ]  | [ ]  | [ ]  |

**Is there anything you would like us to improve or do differently for future consultations? If so, please tell us below.**

|  |
| --- |
|       |

# Additional questions about you

Your answers to the following questions will help us to evaluate how successfully we are communicating messages from inspection to all sections of society. We would like to assure you that completion of this section is optional; you do not have to answer any of the questions. All responses are confidential.

Please tick the appropriate box.

**1. Gender**

|  |  |  |  |
| --- | --- | --- | --- |
| Female [ ]  | Male [ ]  | Prefer not to say [ ]  | Prefer to self-describe       |

**2. Age**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Under 14[ ]  | 14–18[ ]  | 19–24[ ]  | 25–34[ ]  | 35–44[ ]  | 45–54[ ]  | 55–64[ ]  | 65+[ ]  | Prefer not to say[ ]  |

**3. Ethnic origin**

(a) How would you describe your national group?

[ ]  British or mixed British

[ ]  English

[ ]  Irish

[ ]  Northern Irish

[ ]  Scottish

[ ]  Welsh

[ ]  Other (specify if you wish)

[ ]  Prefer not to say

(b) How would you describe your ethnic group?

|  |  |  |  |
| --- | --- | --- | --- |
| **Asian** |  | **Mixed ethnic origin** |  |
| Bangladeshi | [ ]  | Asian and White | [ ]  |
| Indian | [ ]  | Black African and White | [ ]  |
| Pakistani | [ ]  | Black Caribbean and White | [ ]  |
| Any other Asian background (specify if you wish)      | [ ]  | Any other mixed ethnic background (specify if you wish)       | [ ]  |
| **Black** |  | **White** |  |
| African | [ ]  | Any White background (specify if you wish)      | [ ]  |
| Caribbean | [ ]  | **Any other ethnic background** |  |
| Any other Black background (specify if you wish)      | [ ]  | Any other background (specify if you wish)      | [ ]  |
| **Chinese** |  | Prefer not to say | [ ]  |
| Any Chinese background(specify if you wish)      | [ ]  |

**4. Sexual orientation**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Heterosexual[ ]  | Lesbian[ ]  | Gay[ ]  | Bisexual[ ]  | Prefer not to say[ ]  |

**5. Religion/belief**

|  |  |  |  |
| --- | --- | --- | --- |
| Buddhist  | [ ]  | Muslim | [ ]  |
| Christian | [ ]  | Sikh | [ ]  |
| Hindu  | [ ]  | Any other, please state:      | [ ]  |
| Jewish | [ ]  | None | [ ]  |
| Prefer not to say | [ ]  |

**6. Disability**

|  |  |  |  |
| --- | --- | --- | --- |
| Do you consider yourself to have a disability? | Yes [ ]  | No [ ]  | Prefer not to say [ ]  |



The Office for Standards in Education, Children's Services and Skills (Ofsted) regulates and inspects to achieve excellence in the care of children and young people, and in education and skills for learners of all ages. It regulates and inspects childcare and children's social care, and inspects the Children and Family Court Advisory and Support Service (Cafcass), schools, colleges, initial teacher training, further education and skills, adult and community learning, and education and training in prisons and other secure establishments. It assesses council children’s services, and inspects services for children looked after, safeguarding and child protection.

If you would like a copy of this document in a different format, such as large print or Braille, please telephone 0300 123 1231, or email enquiries@ofsted.gov.uk.

You may reuse this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, visit [www.nationalarchives.gov.uk/doc/open-government-licence](http://www.nationalarchives.gov.uk/doc/open-government-licence), write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gsi.gov.uk.

This publication is available at [www.gov.uk/government/organisations/ofsted](http://www.gov.uk/government/organisations/ofsted).

Interested in our work? You can subscribe to our monthly newsletter for more information and updates: <http://eepurl.com/iTrDn>.

Piccadilly Gate

Store Street

Manchester

M1 2WD

T: 0300 123 1231

Textphone: 0161 618 8524

E: enquiries@ofsted.gov.uk

W: [www.gov.uk/ofsted](http://www.gov.uk/ofsted)

No. 180044

© Crown copyright 2019

1. ‘Making data work: report of the Teacher Workload Advisory Group’, Teacher Workload Advisory Group, 2018; [www.gov.uk/government/publications/teacher-workload-advisory-group-report-and-government-response](https://www.gov.uk/government/publications/teacher-workload-advisory-group-report-and-government-response). [↑](#footnote-ref-2)
2. The Education (Independent School Standards) Regulations 2014, paragraph 2(2)(a) <http://www.legislation.gov.uk/uksi/2014/3283/schedule/made> [↑](#footnote-ref-3)