

**A focus on improvement; proposals for further education and skills system inspections from September 2009: Consultation Response**

**We said:**

The Institute for Learning welcomes the proposals for developing the inspection methodology for further education and skills, in particular the focus on action where there will be the greatest impact on improving outcomes for learners. In a sector where resources are traditionally stretched to capacity but with a strong intent towards effective self-regulation, an inspection methodology proportionate to risk can strike an important balance between intervention and improving performance.

The proposal rightly identifies performance data as a key determinant for risk. The IfL does not share Ofsted's perception of a sector confident in the use of performance data in terms of workforce development. It may be the case that providers use learner data to establish priorities and evaluate progress, but less than 80% of colleges contribute systematically to the staff individualised record (SIR) and the extension of the collection of workforce data beyond FE colleges to the wider sector is in its infancy. This must be recognised in any risk profiling exercise.

With responsibility for data collection and analysis shared across organisations and key elements residing in very different locations, there is a potential risk for the proposal. Learner information is linked to funding and the financial driver for completion and submission is clear. Workforce data are more vulnerable, at present this is collected and analysed on behalf of the sector by Lifelong Learning UK and the data set is far from complete or comprehensive.

With the increased focus on professionalism, reflected in the IfL's critical role in teaching professionalism, a provider's ability to support the development of its workforce must feature in any measurement of risk. As the proposal stands, there do not appear to be any performance indicators within the annual risk assessment process which respond to the workforce development agenda.

Lighter touch inspections have been well received by the sector and the correlation between performance data and intelligence and judgements of good or outstanding is important. We know, however, that data are easily manipulated to achieve effect and it must not be the case that providers become focussed on the best possible presentation of information as a means of achieving lighter touch inspection. Here the notion of 'no notice' inspections is important and a degree of random sampling overlying an inspection methodology proportionate to risk might be helpful.

In responding to the question of high performing providers having the benefit of longer gaps between inspections, it would be useful to see the correlation between this aspect of the proposal and the impact on resources. Six years may be appropriate, but there would need to be absolute robustness in the receipt and analysis of performance data and other intelligence to provide adequate assurance of ongoing excellence. The

'health check' will be an important element and other agencies may have an important role to play in informing this process. It would be useful to see the triangulation across other agencies and bodies described within the proposal to add clarity and vision.

The capacity to improve is an important feature of self-regulation; it is also an underpinning theme of the professionalisation agenda. When looking at performance management arrangements within providers this should include the harder to measure targets that reside in individual appraisal. It should not be enough to demonstrate organisational capacity for improvement, but include the way in which this impacts on individual teaching and support staff.

The drive towards seeking a broader range of evidence by following the learners' journey is welcome. Differentiating this between the higher performing providers and those with satisfactory or inadequate provision would appear to be a negative measure. If anything, it is more important to have a higher level of engagement with learners through inspection in those providers who are underperforming.

### **Our members said:**

- "I welcome the opportunity to comment on the proposals. I take on board the concern over an extended gap of 6 years between inspections for high performing colleges, and hope that this time could be spent acting as mentors, spreading good practice among under performing colleges. I also propose that the peer-to-peer observation practice could be a wonderful inter-college device, to compare systems and formulate solutions to cross college issues. I also think it is really important for staff in colleges to have an input into proposals for future inspection frameworks, so thank you!"
- "Thank you for highlighting this consultation. We have just had an 'unannounced follow-up' inspection. Because we are not a college and we work 52 weeks a year (teaching in a secure environment) the Common Inspection Framework does not apply to us in many respects. Our students can come and go as they like: classes do not start in September and go on until July we have 'rolling' classes throughout the year. The Inspectors, it seems, can not think 'outside of the box' and give us credit for what we are doing well, which is teaching our students valuable skills, but concentrate instead on what we are NOT able to do, such as give them a formal, structured, term-based education system.

Many thanks for the opportunity to comment on this. Just the sort of service the IfL should be offering."

- "I think colleges have become far more sophisticated in their approach to self assessment since the introduction of the common inspection framework and existing inspection methodology. In my experience in three colleges, we have moved from self assessment to satisfy the needs of inspection towards an understanding that self assessment is a natural and desirable part of a providers approach to quality improvement.

I do, however, share the IfL's concerns about data. I know of a 'high performing college' that has not fully completed and returned its SIR for the past few years.

Another college I have worked at, whilst satisfying the SIR return, does so by gathering the information from staff a few days before the return is due and does not use workforce data to inform its strategic planning.

Now I know it exists I will be commenting on the consultation directly, so thank you for this.”

- “Having recently been inspected I feel well qualified to comment.

We had four weeks (I think) notice of inspection and, to be honest, the college went into panic mode. Very little teaching was done as we ran around like headless chickens making sure there was evidence of all the things we knew we were doing well but were worried that the inspectors wouldn't see. I don't think that is a fault of the inspection process, but it is a natural response from the college wanting to come across at its best. But shouldn't we be doing that all of the time - our best should be our norm. It seems to me that the more time you have to prepare for inspection, the more invasive it is. Surely no or very little notice is the way to go - that way quality systems in colleges will need to be top notch all of the time.

I'm well prepared, or at least I like to think so, and welcome lesson observation as it provides me with objective feedback on my performance. In my department we have informal peer to peer observation over and above the college's internal observation system because we value the learning that comes from this. I can't help but think that college-based inspections may not be the best way forward as the focus is on the performance of one institution. Wouldn't it be refreshing to have subject or curriculum themed inspections across all providers in an area or region, for example all health and social care in Buckinghamshire in April. Whilst still enabling judgements about individual providers, this shifts the focus from the organisation to the learning via the subject. I accept that this may be a little revolutionary for Ofsted.

I know from reading your magazine that the IFL is really keen on the peer to peer aspect of CPD. How about this for a thought - if we get to the stage where teachers are continually assessing their own performance through CPD and shared reflection, will we get to the point where we don't need inspection? I guess inspection is here to stay, but if we are going to be serious about FE teaching as a profession, we need to reach the point where teachers (your members) are trusted because it is quite obvious that they are regulating themselves through the IFL. I've never really thought about the IFL in that way but now I'm quite excited about it, making the case that CPD is a way of monitoring and improving teaching.

I don't know if I really understand the risk bit. As useful as data and 'intelligence' is, we all know it can be used to mask a multitude of things and I can't help but think that once again data will become more important than people - the teachers and the learners really matter more, don't they? My college will become fixated on how best it can sell itself through data and information, we've been here before.

To be honest I need to think a little more about this - I started this comment box thing without really thinking what I was going to say and now realise that this is actually quite complicated and (though this is scary) I want to think about inspection - how strange is that. I might even count this as CPD! Love the blog idea, seems so much more of a natural way to consult than a set of fixed questions. Brilliant idea.”

- “Many thanks to IfL for providing a coherent and thoughtful response to such importance issues as are raised by the Ofsted Consultation process. As a practitioner who has worked on both sides of the 'inspection fence' I would endorse all the points put forward here.”