

University Alliance response to Ofsted's Big Listen

Please tell us what you think Ofsted's priorities should be when reporting on inspection, and why, and what can we improve?

Single word judgements should be reviewed and be the subject of a specific consultation. There is a risk that in Higher Education Institutions (HEIs) with diverse provision distributed across a large institution, an isolated element that prompts an 'inadequate' judgement and the pausing of other unrelated provision could have serious implications for the HEI, employers (including the public sector workforce) and the wider region. This has not yet come to pass, but the stakes are very high.

An example scenario of this would be health and social care apprenticeships which may be performing well, being impacted by an inadequate judgement in another, unrelated field delivered at the same HEI. Ofsted judgements affect an HEIs ability to tender for NHS contracts, including inclusion on the Salisbury framework. The NHS Long Term Workforce Plan relies heavily on apprenticeships to meet its targets in certain regions, thus the ability to recruit to specific programmes (or lack thereof) could impact on meeting these workforce needs, particularly due to the time between inspection gradings.

Do you have any comments on Ofsted's current inspection practices and whether they should change?

The fundamental model of 'spot (re)inspection' is not appropriate for the HE context and effective, deep and sustained quality enhancement would be better achieved through a more collaborative regulatory model. The Nursing and Midwifery Council (NMC) provides a strong example of rigorous, effective, and collaborative regulation in an HE context: if a provider is found to have not met NMC standards in one or more respects, the NMC will work with the provider in developing, implementing, and overseeing an action plan to correct the deficiencies found, over a planned period of approximately 18 months. A supportive and multi-touch-point regulatory approach is also likely to remove deterrents to prospective new providers of apprenticeships.

A consultation on single word judgements (mentioned in our answer to the previous question) could include exploring how this model of regulation might apply to Ofsted. For example, could there be suspended or 'pending' judgements in certain cases, allowing the provider time to make changes based on a clear action plan that is co-signed by Ofsted, with a follow-up visit within 6-12 months covering the specific areas identified?

A good starting point would be to apply the 5-day extended notice period to all providers. No notice inspection is not a sensible way to have an informed and 'grown-up' dialogue between high-level professionals, particularly for HEIs which are already subject to a raft of regulation and quality requirements. A 5-day notice period strikes the right balance – there is close to nothing that providers can do in that time that would change the outcome, but it allows for a slightly calmer preparation period for the nominee and the supporting teams during the working week and is more likely to ensure they are in the best frame of mind for the rigorous discussions ahead.

We hope Ofsted are willing to extend the enhanced notice period to all providers, but at the very least the process for being designated as a 'large and complex provider' needs to be reviewed. The rules are arbitrary, and it is unclear how Ofsted regional teams approach the decision to nominate providers to be designated as 'large and complex'. For example, a provider needs to have learners registered for delivery in three English regions, but for HEIs there can be differences in where students are registered for the purpose of providing data

to satisfy other HE regulation (e.g., for the Office for Students) versus where the actual delivery is taking place.

The size of the inspection team should be proportionate to the size of the provision. For example, we are aware of one HEI that had 12 of His Majesty's Inspectors (HMI) assessing provision for 350 learners.

The current Education Inspection Framework is a good fit for full time education (as shown by the larger proportion of outstanding judgements for colleges versus HEIs) but is not fit for purpose for Apprenticeships. One remedial approach would be to address the 'behaviours and attitudes' element by either redesigning the criteria to be relevant in all contexts; including it in inspection reports but not grading it for higher and degree apprenticeships; or not including it at all for higher and degree apprenticeships. The essence of learners having and displaying a positive attitude to their learning and learning communities is relevant to higher and degree apprenticeships. However, inspection cultural norms (such as emphasis on school-like attendance monitoring and superficial behavioural observations) is inappropriate for autonomous and self-directed learners. 'Output' measures (learner progress, success, feeling respected and self-actualisation) are more relevant than 'input' measures (classroom attendance and deportment during taught sessions), for example.

How do you think Ofsted could best raise standards and improve lives for learners?

Ensuring there are more of HMIs with an HE background on inspection teams would be our priority. However, having HMIs with subject specific knowledge at an HE level (including understanding the requirements of relevant PSRBs) has also been observed to significantly enhance the quality of the conversation and the level of information the inspectors were able to extract during their visits, including from apprentices.

Ensuring HMIs understand the HE context also improves efficiency (e.g., reducing time spent on clearing up misconceptions), which ensures more can be covered during the visit. It is important that all inspectors of HE apprenticeships have a good understanding of the wider context of the HE regulatory environment – e.g. OfS B conditions.

Do you have any comments on Ofsted's openness, and how easy it is to provide feedback to help us improve?

To improve transparency, it would be helpful if Ofsted could find ways to share their collective learning from inspections of similar provision and how this is being used to enhance training and practice for HMIs.