

University Alliance response to ‘Improving the way Ofsted inspects education’ consultation

Proposal 1: Report cards

What do you think about the layout of our new report cards?

The report cards are the final output of inspection, so our feedback is focused on subsequent questions about the approach that sits behind them. Ofsted’s response to the Big Listen focused heavily on its relationship with parents and carers and seems to have prioritised input from this audience. Whilst it is important that audiences have access to clear and focused information, we are concerned that some valuable detail could be lost for adult learners, professionals, employers and other partners through short descriptions of each graded area in the report card. If graded judgements are here to stay, then the report card layout will likely make it easier for external audiences to navigate to the information they require, without the need to limit the narrative detail. The proposed 5-point scale should be simplified, but the accompanying summaries should not deviate too much from the level of narrative detail in the current inspection reports, which are not typically longwinded.

What do you think about our evaluation areas?

We broadly welcome the evaluation areas and the more nuanced and granular approach they might provide. However, these are unfortunately undermined by the 5-point grading scale, as well as the limited information on the new inspection methodology and the implications of HMIs having more areas to cover.

In the context of FE and skills, we are uncomfortable with the “contribution to meeting skills needs” only being applied to certain providers given universities play a significant role and would be a rich source of ‘exemplary’ practice. On the one hand, we are reluctant to encourage additional inspection workload for universities when they don’t have the same statutory duties as colleges and other providers to participate in and have regard to Local Skills Improvement Plans. However, it is difficult to comment definitively without understanding the rationale and potential onward use for this evaluation area. For example, if inspection reports will become a de-facto evidence base for Skills England, Employer Representative Bodies and Strategic Authorities (who will co-own Local Skills Improvement Plans under the proposals in the English Devolution white paper) on an important government agenda, then we would be very concerned about universities not being included. There is also a risk that this limits how universities can explore the curriculum evaluation area as a strength of their provision with HMIs; leaving universities with curriculum strategies underpinned by addressing local and regional needs, or a particular ethos to how they work with local employers and other partners, to discuss their curriculum intent with no foundation. Therefore, this evaluation area should be the subject of additional engagement between the relevant sectors,

Ofsted and the Department for Education, to consider the potential unintended consequences, whether this area should apply to all FE and skills providers, or indeed if this should be part of Ofsted's remit at all.

What do you think of our proposed 5-point scale for reporting our inspection findings?

Ofsted has already taken the welcome [step](#) (albeit with unusual timing and in an overly schools-focussed manner) of acknowledging the “proposed approach to grading is too complicated”. Increasing the grading, particularly when there is a lack of distinction between the proposed grades, risks creating highly inconsistent inspections and will not improve workload and well-being. The grading tips some welcome and well-intentioned attempts at nuance in the evaluation areas into unnecessary complexity and confusion.

What do you think about our approach to 'exemplary' practice?

We agree with the principle that inspections can support improvement, but we have concerns about the approach outlined. Including ‘exemplary’ within the 5-point scale has the potential to be extremely confusing. The expected length of time between a report card being published online and an exemplary case study being added following submission to and approval by the Ofsted Academy, is unclear. Leaving the ‘exemplary’ section of the published report card blank for an unspecified period, or permanently, would do a disservice to many providers by either delaying the recognition of a provider that has performed well or by making the gap between their current practice and the “highest quality provision” appear wider to external audiences. There is also a risk that external audiences will associate ‘exemplary’ with the current ‘outstanding’ judgment, and it will take time for the new approach to become widely understood. The Ofsted Academy is aimed at the sectors it inspects and regulates, rather than prospective adult learners, employers and the wider public and the exemplary case studies could focus on a very specific feature of an evaluation area. This means the presentation will likely be quite different to the other points on the scale and could make the format of the report card less clear.

In addition to the potential for a moderation backlog through the Ofsted Academy, we are concerned about whether HMIs will have sufficient time to identify exemplary practice during the on-site element of an inspection. The [Gilbert Review](#) published in September 2024 highlighted that Ofsted has seen large budget cuts but with an increased remit, meaning it was “hard to see” how Ofsted could manage a large projected budget shortfall and “still complete the volume of inspections required by government”. It is not clear whether Gilbert's recommendation that “Ofsted should advise the DfE and the new government of the dangers associated with chasing school inspection volume at the expense of inspection quality” will be acted upon by Ofsted or the government.

Considering this approach in the context of integrated higher and degree apprenticeship delivery also raises questions about the rationale for the quality assurance of end-point-assessment sitting outside of Ofsted's remit. This already creates unhelpful duplication for providers and will limit the scope of exemplary practice that can be captured under the achievement evaluation area.

If Ofsted proceeds with this approach, the panel reviewing the case studies should include experts with recent experience of working in the relevant provision. Many PSRBs incorporate quality enhancement and recognition of good practice through their accreditation processes and membership services. In addition to including provider experts, there should be a process for ensuring that exemplary practice shared by Ofsted does not fall short of what professions would consider to be innovative.

What do you think about the other evaluation scales we have considered?

On balance, we would prefer a 3-point scale to encourage greater consistency, accompanied by a revised approach to highlighting exemplary practice in a way that supports context-specific continuous improvement. However, Ofsted should consider whether the same evaluation scales need to apply across all the services it inspects and whether a binary met/not met would be appropriate in the context of ITE provision.

What do you think about including data alongside report cards, for example information about how well children and learners achieve?

We support the principle that Ofsted should take into account the context that a provider operates in, and we would cautiously welcome Ofsted using more contextual data during its inspections. For example, data on degree completions and classifications could help contextualise Qualification Achievement Rates where the provider has identified structural issues with end-point-assessments that are beyond their control. However, we are concerned about presenting data alongside report cards and the extent to which this would be meaningful and valuable to external audiences. Transparency is important, but so is clarity. Data requirements vary significantly between the providers Ofsted inspects, which risks causing confusion. Data latency for publicly available information, as well as the impact of the pandemic on student data and trends, would need to be clearly explained. For example, Ofsted has signalled its desire to bring the inspection of Higher Technical Qualifications (HTQs) into its remit. HESA data on HE students' progression rates and qualifications for 2023/24 was published in April 2025 following a three-month delay.

In the context of higher education, consideration will need to be given to how a “local area” will be defined when provision often spans across local and regional boundaries. There can also be differences in where students are registered for the purpose of providing data to satisfy regulatory requirements (e.g., for the Office for Students) versus where the actual delivery is taking place. These considerations will not just apply to those providers designated as ‘large and complex’ (the designation process for which should be reviewed – the rules are arbitrary, and it is unclear how Ofsted regional teams approach the decision to nominate providers).

Consideration should also be given to the English Devolution agenda and how Ofsted will navigate data parameters amidst a patchwork of powers, functions and funding within the Devolution Framework. The English Devolution white paper also raises questions about the

quality of information that might be included alongside report cards and the capabilities of external audiences to analyse it: “Access to, and sharing of, data can be resource intensive, slow and difficult to navigate. Where data or statistics do exist, they can be hard to find, often out of date, be at the wrong geographical level, or require advanced technical and analytical capabilities that are not easily available. While having better access to data is important, it is equally necessary to ensure those being provided with the data have the capability and capacity to analyse it”.

From the limited detail provided in the consultation, we cannot be confident that Ofsted has considered the implications of this proposal for all the services it inspects. Given that DfE is [consulting separately](#), alongside Ofsted’s consultation, about school accountability principles and school profiles, we are concerned that this is an example of considerations not extending sufficiently beyond the schools context. The [Gilbert Review](#) highlighted that “expenditure on school inspection represents only 39% of Ofsted’s total budget yet the review heard from staff that it can seem as though the other functions are subsidiary to the work it does in schools”.

Proposal 2: Education inspection toolkits

What do you think about the toolkit for FE and skills in relation to:	What do you think about the toolkit for initial teacher education in relation to:
<p>General comments</p> <p>There are several instances where the distinction between grades is unclear, particularly between secure and strong practices, leaving too many areas open to interpretation and increasing the potential for inconsistent judgements. For example, “Leaders have an accurate and informed understanding of the quality of teaching and training” versus a “nuanced understanding” and stakeholder engagement “supports” versus “enhances” learners’ experiences, successes and well-being. There are also several instances where the language in the toolkit is too vague, including simply repeating the words ‘secure’ or ‘strong’ as descriptions of practice under those grades (“across the providers work, inclusive practices are strong” being the most glaring example).</p>	<p>General comments</p> <p>There are several instances where the distinction between grades is unclear, leaving too many areas open to interpretation and increasing the potential for inconsistent judgements. For example, “Leaders have an accurate and informed understanding of the quality of teaching and training” versus a “nuanced understanding”. There are also instances where the language in the toolkit is too vague, including simply repeating the words ‘secure’ or ‘strong’ as descriptions of practice under those grades (“across the providers work, inclusive practices are strong” being the most glaring example).</p> <p>The Universities Council for the Education of Teachers has highlighted several aspects of the toolkit that could be improved,</p>

<p>Participation and development</p> <p>Several UA members deliver apprenticeships with mixed learning models, including asynchronous online learning. This includes apprenticeships with professional accreditation in areas such as healthcare. It is important that this, and the wider context for autonomous and self-directed learners, is well understood in evaluating “attendance and participation” and “wider opportunities”. There have been instances where off-the-job learning that is delivered entirely within the online learning environment by the university has not been anticipated or readily understood by HMIs.</p>	<p>which we urge Ofsted to consider. We would draw particular attention to the tensions inherent in the school-centric framing of achievement and inclusion, and the alternative wording proposed.</p>
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What do you think about the research, statutory guidance and professional standards that we have considered? Are there any others we should consider?

It is not made clear in each toolkit where research has been considered, or which duties and standards are being referred to. These should be clearly referenced and kept up to date to avoid confusion and reduce workload. Alongside making evidence sources explicit within the toolkits, Ofsted should outline their approach and criteria for considering and reflecting research evidence within inspection toolkits and how they balance the use of their own research programme with other existing evidence bases.

<p>In relation to FE and skills, what do you think about our working definition of inclusion, and how we will inspect inclusion?</p>	<p>In relation to initial teacher education, what do you think about our working definition of inclusion, and how we will inspect inclusion?</p>
<p>Inclusive practices, leadership and culture are vital and whilst the emphasis on inclusion is welcome, in the context of higher education, the working definition and subsequent toolkits are lacking. The focus on SEND and disadvantaged learners falls short of the requirements of providers registered with the Office for Students to ensure students from all backgrounds are</p>	<p>Inclusive practices, leadership and culture are vital and whilst the emphasis on inclusion is welcome, in the context of higher education, the working definition and subsequent toolkits are lacking. The focus on SEND and disadvantaged learners falls short of the requirements of providers registered with the Office for Students to ensure students from all backgrounds are</p>

<p>supported succeed in higher education, which are based on OfS' statutory duties under the Higher Education and Research Act 2017. Access and Participation Plans set out the risks to equality of opportunity that the provider has identified as relevant to their context. A working definition across all the services Ofsted inspects, the majority of which it does not regulate, seems impractical unless it is more all-encompassing. It should be clearer how HMIs will take account of relevant statutory and non-statutory guidance in different sectors and avoid duplication.</p> <p>Consideration should also be given to ensuring that working in "close and effective partnership" with other agencies (i.e. employers) to secure the "best possible outcomes for learners", does not mean providers are unfairly held to account for their employer partners making reasonable adjustments within the workplace.</p>	<p>supported succeed in higher education, which are based on OfS' statutory duties under the Higher Education and Research Act 2017. Access and Participation Plans set out the risks to equality of opportunity that the provider has identified as relevant to their context. A working definition across all the services Ofsted inspects, the majority of which it does not regulate, seems impractical unless it is more all-encompassing. It should be clearer how HMIs will take account of relevant statutory and non-statutory guidance in different sectors and avoid duplication.</p> <p>Consideration should also be given to ensuring that working in "close and effective partnership" with other agencies (i.e., schools and colleges) to secure the "best possible outcomes for learners", does not mean providers are unfairly held to account for their school and college partners making reasonable adjustments within placement settings.</p>
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Proposal 3: Inspection methodology

What do you think about our proposed changes to how we carry out an inspection?

In our response to the Ofsted 'Big Listen' we raised the importance of increasing the number of HMIs with an HE background and subject specific knowledge at HE level to help improve efficiency and the quality of discussions during on-site visits; the need for inspection teams to be proportionate to the size and complexity of provision; and the need to extend the 5-day notice period to more providers. We were pleased to see these issues reflected in several commitments made in Ofsted's response to the Big Listen, which will be an important part of improving the application of inspection methodology. Ofsted's Big Listen response mentions consulting with the sector on notice periods and the size of inspections, but these were not included in this consultation document. It would be helpful if Ofsted could provide an update on these issues in writing.

We support the principle that inspections must feel "done with not done to" and include activities tailored to the specific provider. However, the limited information on the proposed inspection methodology, coupled with the vagaries that could result from the

proposed toolkits, means we are not confident that this will produce a clear and consistent approach to inspection that manages workload and improves well-being. The removal of the deep-dive methodology prompts several unanswered questions. How will evaluation areas be covered in sufficient depth across the breadth of provision in large and complex providers? Will this increase the complexities and workload involved in arranging meetings with learners, employers, staff and other stakeholders? Greater flexibility at the *start* of the inspection to decide the areas to focus on sounds positive, but the potential for greater pivots throughout the inspection visit risks creating a chaotic experience for all involved and makes it less likely for providers to be in a state of ‘business as usual’ during inspections.

Ofsted should provide a breakdown of the types of providers involved in the [test visits](#) conducted alongside the public consultation and the lessons learnt. Were universities invited to volunteer based on their ITE and/or FE and skills provision?