3 May2024

Sir Martyn Oliver
HMCI
Office For Standards in Education
Petit France
London SW1H 9EX

Dear Sir Martyn,

UCET response to Ofsted 'big-listen' consultation

UCET is very grateful to have the opportunity to comment on ITE inspections as part of the 'big-listen' exercise.

We thought that it would be helpful to write to you with our key thoughts and to contextualise our more detailed response which we have submitted on-line, a copy of which is attached at Annex A to this letter. This reflects feedback we have received from individual UCET member institutions, unedited details of which can be found at Annex B.

We would welcome the opportunity to discuss our response with you in person, to add to the very helpful discussions that we have already had, and for which we are grateful, with your colleagues Rory Gribell and Helen Matthews.

We are pleased to confirm that UCET members have reported that recent ITE inspections have, with a small number of exceptions, been conducted in a professional and collegiate way and that ITE providers have been given the opportunity to make their voices heard.

The 'big-listen' provides us all with a timely opportunity to re-conceptualise how ITE inspections are carried out. This need not require a change to the current ITE inspection framework or to the existing regulatory requirements, although we will of course take other opportunities to comment on each of these. We agree with the statement in the 'big-listen' documentation that inspections should not be seen as something to be '*got through*' but should instead be part of a process that '*raises standards and improves lives'*. This suggests that there should be less of a focus on compliance and more of an open dialogue between the professionals carrying out the inspections and those who design and deliver ITE programmes. ITE providers should be encouraged by inspectors to take a holistic and nuanced approach to ITE. The agency that ITE providers have to interpret, contextualise and take a variety of approaches to ITE should be nurtured and celebrated. Formulaic and 'tick-

box' approaches can stifle creativity and constrain quality. This might on occasion require inspectors to look below the surface and allow for the fact that that fidelity to national requirements can be assessed in deeper ways than through surface level and superficial references to, for example, specific aspects of the ITTECF. There is a perception that at least some inspections are inquisitorial, with ITE providers being subject to rapid-fire questioning with a focus on compliance-checking. Making sure that programme structures comply with at least some of the regulatory requirements (for example those relating to age-phase and time spent in schools) could be done as part of a desk-based exercise, thus releasing valuable inspection time for open and collegiate dialogue and the potential to have a meaningful and lasting impact on quality.

More account should be taken of the pressures that ITE inspections can place on partner schools and colleges, many of whom work with more than one ITE provider and so can be subject to multiple inspections involving lesson observations and meetings with senior school staff, school-based mentors and ITE students. Schools and colleges are already faced with multiple pressures, and for ITE these will increase with new expectations in regards to mentor training, ITAP and other aspects of the new Quality Requirements. We are particularly concerned about the suggested move towards a three-year inspection cycle which might lead schools and colleges to question their future involvement in ITE, which would have an impact on the availability of placements, programme viability and levels of recruitment.

Inspection teams need to understand the context, structure and regulatory frameworks within which HEIs operate, and of the added value that the university sector can bring to teacher-education. Out of date and stereotyped distinctions between 'HEI-based' and 'schools-led' teacher education should be avoided. We would recommend that inspectors familiarise themselves with the UCET Intellectual Base of Teacher Education (IBTE) report which sets out what we consider to be the key features of effective teacher education, a copy of which can be found at: https://www.ucet.ac.uk/11675/ibte-position-statement-updated-february-2020.

A key function of inspections is to make judgements about the quality of ITE and to hold ITE providers to account. Inspections should also inform government policy, and OFSTED should use inspection evidence to make DfE aware of any shortcomings in regards to its teacher education policies and to hold government to account for the decisions that it takes.

The views expressed about ITE as part of the 'big-listen' should be reported back to the sector and, where appropriate, acted upon by OFSTED. We would welcome sight of a summary of responses and the impact that the responses will have on future inspection practice.

More detailed comments can be found in the attached documentation. We would highlight those relating to: the timing of inspections and the notice periods that are given; the importance of having consistency in the size and experience of inspection teams; single-grade inspection judgements; and the monitoring of actions taken by OfSTED in response to the feedback that it receives.

We look forward to discussing these issues with you in greater detail.

Yours sincerely,



James Noble-Rogers

Executive Director

Annex A

UCET response of Ofsted 'big-listen' (as submitted)

1. How important are the following to you (very important; important; neutral; not very important; not at all important)
    a. Make it clear what the provider is like for the trainee or participant such as how well supported they are in their learning **important**
    b. Make it clear whether the content in the DfE's frameworks is covered fully in the development & training **neutral, as can be assessed outside the inspection process**
    c. Give a clear judgement on the quality of education/professional development and training **important**
    d. Give a clear judgment on the quality of leadership management **important**
    e. Make it clear how we use any data to inform our judgement, such as any relevant outcomes or context the provider is working in **important**
2. Please tell us what you think Ofsted's priorities should be when reporting on inspection, and why, and what we can improve.

    OfSTED reports should identify the strengths of ITE provision and how these might be further developed to improve the experience of student teachers and benefit the quality of education in the range of schools and colleges the students might work in once qualified. Unique and distinctive practices should be highlighted for the potential benefit of other providers. The engagement of schools in the design and delivery of programmes should be examined. Where areas for improvement are identified these should be contextualised with reference to relevant external and potentially mitigating factors such as the availability of resources, recruitment issues, size of provision, subject & phase coverage, and the capacities and contexts of partner schools and colleges.

3. Our work covers millions of children and learners, hundreds and thousands of professionals and children's service providers. Ofsted's inspections take many forms across different types of providers. There are different processes depending on whether they are education inspections or regulatory activity for early years and children's social care. Inspection should not be a process to 'get through'. The point of inspection is to raise standards and improve lives. It should be an opportunity for providers to showcase good practice and understand where they can improve. How important are the following to you:
    a. The way we carry out inspections is consistent from place to place and across the same type of provider. **Important, although 'consistency' should not be taken to imply 'uniformity'.**
    b. The length of inspections allows inspectors to make secure and reliable judgements. **Important**
    c. The time between notifying a provider about a forthcoming inspection is short but appropriate **Important**

d. We should consolidate our inspection processes where possible. For example, if an ITE or ECF/NPQ programme provider is delivering 2 or 3 courses, we should inspect all of them at the same time. **Neutral**

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

- **OfSTED should encourage ITE providers to take a holistic approach to delivering the ITTCCF, ITE criteria and the Quality Requirements. The agency that providers have to interpret, contextualise and take a variety of approaches in the design & delivery of programmes that meet the relevant criteria should be nurtured and celebrated. Formulaic and 'tick-box' approaches to compliance can stifle creativity and constrain quality. This might on occasion mean that inspectors look below the surface of what programmes involve and how they are documented and allow for the fact that reference to the various criteria might be addressed in a deeper way rather than through superficial and surface level references to, for example, specific aspects of the ITTECF.**
- **Inspectors should be facilitated in having a deep and nuanced understanding of the contexts and frameworks within which HEIs operate and the value that, for example, level 7 provision can bring. Inspectors should look at ITE through multiple lenses, and not only those of individual schools or of school-based ITE provision. Outdated and false dichotomies between 'school-based' and 'HEI-based' teacher education should be avoided.**
- **If, as OfSTED thinks, inspections should not be something to be 'got through' but should instead be a process to raise standards and improve lives, inspections should not be inquisitorial in nature, and there should be less focus on peppering providers with specific questions and much less of a focus on compliance, which can at least on occasion be interpreted as '*trying to catch providers out*'. Checks for compliance could be done as a desk-based exercise. This would allow greater scope for professional and collegiate dialogue which could have a meaningful, rather than a potentially superficial, impact on quality and outcomes.**
- **As well as/instead of checking compliance against the various criteria, OfSTED should also delve deeper into programmes to arrive at a more nuanced understanding of programmes, as well as making judgements about the appropriateness and relevance of the criteria themselves.**
- **The timing at which inspections are carried out and the nature of the student cohort should be factored into OfSTED judgements. For example, student teachers on programmes inspected in the early part of the year will not have as deep an understanding of the curriculum or subject knowledge as those at providers inspected later in the year. While those with prior teaching experience (undergraduates compared to postgraduates and home versus domestic students) will have different characteristics which should be reflected in inspection judgements.**
- **The pressures and resource implications inspections have for providers themselves and for partner schools and colleges, especially those who work with multiple providers, must be considered, especially if a three-year inspection cycle is introduced. The pressures being placed on schools could make some either withdraw from ITE altogether or reduce the number of placements they offer, thus constraining recruitment, undermining programme viability and adding to teacher**

supply difficulties. The unit of resource for ITE of £9,250 has remained, despite inflationary pressures, the same for many years and will be unsustainable going forward.

- **There should be more consistency in the size and balance of inspection teams, as the number and skills of inspectors can influence the number and range of deep subject dives that are carried out. This can potentially benefit some providers at the expense of others and make meaningful comparisons between providers difficult. Too much emphasis should not be given to evidence collected from small evidence bases.**
- **There should be a review of how feedback is provided during inspections and of how providers are able to comment on draft inspection reports. The time between being inspected and receiving the report should be reduced.**
- **Single word judgments are potentially inaccurate and misleading. The distinctions between particular judgments will, in borderline cases, inevitably include a degree of subjectivity.**
- **Inspections could be shorter and ungraded where, no issues of concern have arisen.**
- **Three days' notice is not sufficient to organise school/college visits etc, and in practice the inspection begins for providers as soon as the notification call is received. One working weeks' notice should be the norm.**
- **Clearer indications of the weeks in which OfSTED might potentially visit would help providers to plan, and allow staff to book annual leave, with consequent benefits in regards mental health & well-being.**

5. We start from the position that OfSTED aims to be a force for good in this country, with the interests of children and learners as our priority. We hold to account those responsible for educating children, keeping them safe and improving their lives. We must ensure that our impact is entirely for the good of children and learners, while being mindful of the well-being of the leaders of those we inspect and the professionals who work for them. We know that providers of teacher development face a variety of changes and challenges within the sector. But we also know that the quality of teaching is the most important in-school factor in improving the life chances of children and learners, especially those from disadvantages backgrounds. It is crucial that the initial training and subsequent professional development of teachers is of the highest quality. We should ask ourselves what Ofsted's role is in ensuring that teachers receive the highest standard of education and training. Do you agree with the following statements:
    a. OfSTED holds ITE providers to account for the quality of education and training that trainees receive. **Agree**
    b. OfSTED holds ECF and NPQ providers to account for the quality of education and training that trainees receive. **Agree**
    c. The number of good and outstanding ITE providers in England gives you a strong indication of the overall quality of the teacher training sector. **Neither agree nor disagree, as it will depend on the accuracy and consistency of inspection judgements**
6. Ofsted's ambition is to be a world-class inspector and regulator, trusted by parents, children, learners and the sectors we work with. Achieving this ambition means listening to feedback, accepting criticism, and delivering reforms that that lead to continuous

improvement in everything we do. This includes ensuring that the quality of Ofsted's education and regulatory work is consistently high, as well as receiving the way we work and how open we are. We inspect and visit a wide range of schools, education providers and care settings. These cover a diverse range of faiths, communities, heritages and backgrounds. It is crucial that we are culturally sensitive to the providers we work with, to reassure them that we understand the context that they work in and the people they work with. We must also think about the impact of our work on the well-being of everyone we work with and work for. Some of our work around this is covered in our response to the tragic death of headteacher Ruth Perry and to the coroner's inquest. We want to hear your views on what we should focus on now. Do you have any comments on Ofsted's openness, and how easy it is to provide feedback to help us improve?

We welcome the opportunity we have at a national level to discuss inspection frameworks and processes with OFSTED, and providers welcome the increased opportunities they have to feedback on their own inspection experiences. OFSTED should be open to criticism and should avoid the (understandable) temptation to take a defensive line in response to any concerns expressed. The extent to which provider feedback is 'listened to' can in part be measured by the extent to which concerns expressed are accepted and acted on by OFSTED. This should, we think, be carefully monitored, with an expectation that over time that a given proportion of concerns are accepted as being valid.

Is there anything else that you would like to tell us?

We welcome OFSTED's stated commitment to sharing best practice, but question whether it is doing enough in this regard. Sharing of high-quality practice and feedback from inspections could be done at a regional level – as used to happen pre-pandemic – through conferences and other activities.

The basis on which OFSTED carry out research should be reviewed. For example, how are research ethics taken into account when research methodologies are agreed, and what consideration is given to BERA guidelines? How are the foci for the research identified? How are research findings disseminated? Are OFSTED sure that research is not carried out simply to confirm pre-existing policy?

Annex B

Individual comments received from UCET members

Knowledge & expertise of inspectors

Institution 1

Because Ofsted inspectors of ITE are not necessarily ITE experts they might have superficial ideas on what quality ITE looks like; we can help train them here. So a good example of this might be: Ofsted should move away from the view that there is a binary split: theory in uni/SCITT hub; practice in schools - this is an outdated notion of what good teacher education looks like (my HMI team said this several times during the week, and it rankled with my whole team constantly that this is somehow what they still cling on to as an underpinning understanding of what we do).

Institution 2

Some colleagues have questioned the experience of teams, although in my experience there has been a good mix of ITT experience and inspection experience; these can complement each other well. I have also found lead inspectors, particularly, to always have a good understanding of proportionality (i.e. not reading too much into any small thing) and to be realistic about what is possible on a short PGCE course.

Institution 3

Our experience of this has been positive with inspectors behaving with courtesy and professionalism in dealings with staff, students and schools.

However, the high stakes and reputational risk of the single word judgement creates high levels of anxiety and stress for staff, both in ongoing readiness and in through the inspection process. The challenge of this combined with a lack of institutional familiarity with the process and culture of Ofsted develops non-constructive pressures on staff.

Institution 4

This would be the aspect of which I would be most critical. The lack of understanding of inspectors of either the institutional context of HEIs or the complexity of professional learning compared to schools leads to a lack of confidence in their ability to gather appropriate evidence or form reasonable judgements of provision. Experience also suggests a lack of knowledge of the evidence base on which our provision draws or the level of criticality of evidence that we expect of student teachers.

Conduct of inspections

Institution 1

ITE inspectors must move away from the machine-gun-peppering of questions when conducting their focused review meetings. I have since checked out with a few others and the sheer volume of questions that some tutors have experienced in any sngle meeting (and indeed stakeholders in schools/trainees) can leave colleagues feeling like they have not had a chance to show off the very best of their provision. At best, such an approach can result in only surface level answers, and surface level understanding. At worst, it is very intimidating for trainees/ECTs.

Please can OfSTED stop saying "we don't expect you to produce more/do more work" – it is a silly thing to say to ITE teams, when all of us know that when Ofsted HMI teams are in.

You inevitably go away from meetings finding more evidence for their lines of enquiry. The portal evidence (from the framework lists of evidence required) does not equate to what is needed in reality during an inspection week. And we all know this.

Institution 2

The two-and-a-half days' notice that we are given is inadequate in terms of what needs to be done in that time in order to be prepared. Even if all documentation was ready to go, it's the time taken to organise rooms, liaise with schools about observations, meetings etc that eats up a lot of time and necessitates weekend working. Even a Monday phone call would alleviate this a little.

In the same vein, our inspectors requested pen portraits of the students that they were going to observe on placement. Given we cannot predict who they are going to see, I do not think this is a fair and reasonable request given the timeframes.

Also, I have been told that in recent inspections, Ofsted inspectors have viewed tutors delivering teaching sessions. Given our inspection was in June and there was no teaching, I am struggling to understand how this can ever be a level playing field as the schedule then becomes reliant on the time of year that the inspection takes place.

Institution 3

Can Ofsted work in more collegiate/supportive ways? Talking to colleagues in Northern Ireland, they report less fear around inspections. They say it is more like a discussion which results in advice being given that can be developmental in nature. We recognise the need for an inspectorate, but it can feel too adversarial.

It would be helpful to have a clearer sense in advance of which weeks Ofsted will and will not come in, especially around holiday times. It can be very hard for staff in leadership roles to book any annual leave between January and July.

There is a sense that if you are inspected early in a new cycle that you are disadvantaged and that the process is therefore not fair. Could reassurances be given that this will not be the case?

Institution 4

The inspectors were in their most recent visit professional, polite and conducted themselves well. This was not the experience in our 2017 inspection, so feels like a big improvement. In the most recent inspections, there has been lots of very open concern given to the well-being of staff being inspected.

Institution 5

Inspectors need to be trained to have a better understanding of the higher-education context and of the various frameworks within which universities have to operate. Perhaps more importantly, they do not always seem to have a firm grasp of the frameworks against which they themselves are inspecting, for example not understanding when ITT criteria and Quality Requirements relate to how courses are organised and structured and not to individual trainee experiences.

Institution 6

The short timeframe for organisation is problematic in large partnerships. Again, this seems to be a case of standardising approaches for schools that are not well suited to large

partnerships and HEI providers. Current experience of the iQTS inspection pilot with longer lead times for organisation suggests that this is an area that might strengthen inspection rather than weaken it. Based on timings of inspections, there seems to be a lack of consistency over the range of evidence drawn on, e.g., observation of HEI-based teaching, observation of student teachers at different stages of the course.

Institution 7

During inspections, feedback sessions/meetings are not a forum for discussion or an opportunity for professional debate or response. For example, the grading and final feedback meeting at the end of the inspection, to which a maximum of 2 phase leaders and managers are invited 'as observers', but where all judgments are 'made by inspectors and the inspection team' (Ofsted ITE Inspection Framework and Handbook, 2023, p, 21), represents a one-way transfer of information and judgements, and is illustrative of this. In addition, the 5-day time limit for providers to respond to the draft inspection report further restricts the opportunity for professional debate or dialogue. We feel this approach is extremely unhelpful and not conducive to improvement (which Ofsted claim to be their 'guiding principle' (p. 6)). For the process to be 'a force for improvement through intelligent, responsible and focussed inspection' and to truly contribute to quality enhancement, then time and commitment need to be given to inclusive and outward looking professional dialogue.

We are not anti-accountability and strive for continuous improvement in our teacher education provision but the level of scrutiny by Ofsted during inspections seems excessive and unjustified.

Short notice - We have serious concerns over the short notice given for inspections and would appreciate knowing the rationale for this approach. In our eyes, this implies mistrust and that inspectors are aiming to catch fellow professionals out and not in. Furthermore, it shows a complete lack of understanding of the HEI context. The core business of HEIs includes research, innovation and teaching with colleagues committed to working nationally and internationally to perform at a high level across all of these core areas. Short notice inspections fail to take this into account, are highly disruptive and they present numerous genuine challenges and difficulties. The assumption that HEI colleagues (and the school staff with which they work) can cancel or move other professional commitments and important activities at such short notice to make themselves available for an inspection is unrealistic and potentially damaging both financially and reputationally, if they need to do so.

In our view the timing of inspections needs to be negotiated such that time can be put aside and other commitments arranged around an inspection. Engaging with providers to agree a suitable and mutually convenient and appropriate time to visit should also be more efficient for all parties.

Burden and workload - Whilst efforts have been made to the reduce the burden of inspections in successive revisions to the Ofsted Framework, and the current Inspection framework claims Ofsted will not 'create unnecessary workload' (page 9), this is still far from the case in reality/practice. Inspections still remain very burdensome (and costly) for providers, schools and Ofsted in terms of time, energy and resource.

The claim that Ofsted does not require providers to 'do additional work' for the inspection (page 9) is false. An inspection simply would not be able to take place without additional work. Indeed, the text on page 10 of the Ofsted Inspection Framework and Handbook completely contradicts this when it lists the information providers must 'produce' by 9am on the following day. A further list of what providers must provide by 10.30am on the first day of the inspection then follows. This additional work alongside attending the preparatory

meetings (or ‘conversations’), confirming the inspection timetable and making the resultant practical arrangements for the visit represents a huge added burden before the inspection week (lasting 4 days) itself has even begun.

In addition, we are particularly concerned about the increased workload and pressure inspections place on school-based colleagues in partnership schools and trainee teachers (the former of whom also have their own inspections to manage). At a time when teacher recruitment and retention is in crisis and given the many and increasing demands and pressures within teacher education and teaching, surely we all need to be working collectively to support ITT colleagues, teachers and trainees to support and develop them, not creating additional burden and workload through inflexible and overly demanding inspection practices. This, and the costs involved in inspection, seem unjustifiable given the current landscape.

We are keen to further develop and continually improve our teacher education, but this is in spite of, rather than because of, inspection. As professionals, highly committed to and experienced in teacher education, and with rigorous, robust and well established internal and external quality assurances and accountability measures already in place within HEIs, we feel that Ofsted, in itself, does not have a positive impact on provision. Rather, inspections in the HEI context seem to represent unnecessary replication of time, effort and expense.

In our view, and contrary to the guiding principle and one of the stated purposes of inspection, the process contributes little to improvement and is in fact counterproductive to this goal. Indeed, we would go so far as to say that inspection has a negative impact on the quality and improvement of ITT in that it detracts from other critical and core activity such as advancing research (and hence practice) in the area, and trainee recruitment, support, and development. Arguably, the time taken away from such business stifles/threatens developments, quality and innovation.

Institution 8

The period between notifying and carrying out inspections is very important. However, in our recent experience there is no lag between the notification and the inspection commencing. The start of the inspection realistically starts within hours of the notification call with preparation meetings and document exchanges over subsequent days prior to the physical arrival of the inspectors.

Whist it is important to us that inspections are consistent, the fact that a number of inspectors in our inspection were unfamiliar with ITE requirements and the changes brought in through the ITE reforms, was concerning. Many had not worked in ITE. There were questions asked about whether the QTS skills tests are continuing, and no knowledge of ITAP, despite this being a requirement from 2024. Some inspectors lacked an understanding of the complexities of organising inspections of large ITE provision and the timeframe needed to enact that organisation.

Institution 9

From the outset, it was reaffirmed that the health and wellbeing of the team were paramount; this was welcomed by the Lead Inspector. There was transparency and professionalism throughout, with wrap-around acknowledgement of how the team were feeling and if any concerns were arising throughout the inspection, time was given to this.

We welcomed the additional request for a named person outside of the team to contact if the Ofsted team noticed any distress within the provider team.

We noticed a significant willingness on the part of the team to identify strengths . On the whole, they did manage our expectations of outcomes throughout the inspection but gave praise where it was due.

Institution 10

The inspectors recognised the value of university led ITT . They repeatedly mention the ‘vibrant research environment’ and in feedback meeting repeatedly discussed what being part of a university brings to the table. They spoke of how we don’t simply underpin our curriculum with research but that we are involved in generating the research – the strength of subject tutors and their connectedness across the sector and involvement in research really came through well .

ITE Inspection Framework

Institution 1

The current framework as it stands is interpreted in a very black and white way by HMI teams - there is no account taken of:

(i) the stage trainees are at and where a provider would expect a trainee's understanding to be on any one theme;

(ii) the nature of how you work with different types of trainee (i.e. international v. home; experienced v. inexperienced; subject knowledge strength v. non-subject knowledge background etc) - e.g. in our inspection, asking why we had not set a subject knowledge target for a native French speaker seemed a wee bit silly.

Institution 2

The current framework is a big improvement on the last one, particularly the focus on curriculum and student experience rather than on data.

Institution 3

The framework is lengthy and complex making it time consuming and challenging to reflect the full scope of the framework in course design, evaluation and development. This is particularly the case in relation to qualitative aspects of the framework and reference to descriptors such as 'ambitious'. The influence of the common inspection framework also creates a lack of fitness for purpose in relation to high level professional learning on a PGCE. Terms such as 'coverage' and 'cumulative knowledge' are better suited to a transmissive pedagogy and school curriculum than a sophisticated and complex professional learning environment. Sections 19 and 20 are challenging to evidence from experience and the process of improvement driven by the inspections comes largely from published reports that again seem to be limited in scope and style by a need to write to external audiences rather than directing areas of improvement to the sector.

We have not experienced grading under the current inspection framework. However, there is not a strong level of confidence that the grade descriptors allow for a clear and well-evidenced account of how the grade is arrived at beyond 'Good'. Conversely, experience with the pilot iQTS inspection grading suggests that attempts to create adjectival grade bands of binary elements of compliance can become nonsensical.

Institution 4

Identifying strengths and areas of improvement in the reporting is helpful and facilitates the sharing of good practice across the sector.

We challenge the need for Ofsted grades and view these to be unnecessary and problematic on a number of counts. Inspection reports and the grades in particular are high stakes, with a link between the outcomes and the reputation and viability of a provider and a provider standing to face significant losses (or gains) based on the outcome. This might lead to course closure, or at least uncertainty over its future, loss of funding, reduced morale, and increased stress/reduced wellbeing, which in turn impact negatively on the delivery of a course. Given the high stakes, it is vitally important that all concerned have confidence in the inspection process, methodology, reporting and outcomes (grades) yet this is not the case. Inspections and the outcomes are based on snapshot judgements based on conversations and interactions with selected stakeholders in any given week, which raises serious questions concerning the robustness, accuracy and consistency of the judgements. Whilst grade descriptors and guidance exist to inform inspectors' judgments, these are open to interpretation and professional discretion is still needed. How inspection reports, and particularly the grades, are interpreted and may be taken at face value by the public, trainees and prospective trainees, is also concerning and potentially damaging.

Institution 5

A one word 'judgement' is not helpful to understand the quality of provision. We welcome external verification on the quality of education and leadership and management, but these are complex areas that cannot be captured in a single-word judgement. We cannot rate how important the 'judgement' is when we fundamentally disagree with the current grading system. The narrative section of the inspection report is much more helpful in understanding the scope and quality of a provider's effectiveness and we would argue that the current system of grading should be removed.

When conducting and reporting on ITE provision, we feel that Ofsted's priorities should be focussed on ensuring that inspectors are suitably experienced in ITE, and have knowledge of the frameworks, quality requirements and policies that ITE providers work within, such that they can provide informed and credible scrutiny and challenge.

Institution 6

The single word judgement is still contentious and challenging. The detailed feedback identifying key strengths across the provision is much more meaningful. It can be used to share with stakeholders about the nature of the provision without the need for a single word judgement.

Other comments

Institution 1

If the ISDR is not going to feature heavily in an inspection, why are we being sent it? It seems like some of us have had it used during inspection, some of us have not had any reference made to its contents. Either provide it or not, or use it or not.

Inspections of ITE providers should be timed so as to minimise the burdens placed on placement schools. Inspecting providers in the same area, who may place students in the same schools, in adjacent weeks can place undue pressure on school staff and might result in some withdrawing from placement activities.

Institution 2

While both large and small providers have achieved the range of outcomes, I wonder if the size of team can sometimes make a difference if fewer subjects can be selected for focused review. Plus, when the provision in a phase is so small that the phase judgements are combined, the overall judgement can hide big differences in quality between subjects or phases. It might be better if either all judgements are combined or no judgements are, whatever the size of provider. Even better, replacing single word judgements with more detail about the differences would be an improvement (as long as they continue to not give too much emphasis to very small numbers). If single word grades are here to stay, I do not think there is really any need for a distinction between good/outstanding grades and a simple 'good'/'not yet good' would do.

I would also suggest that Ofsted consider adopting ungraded inspections in ITT as they already do in schools. If a previous inspection was good or better and there have been no major concerns/changes, the next inspection could be a shorter ungraded one.

Finally, I would like to see Ofsted show its independence more. Instead of checking compliancy and 'fidelity' with DfE instructions, they should use the evidence they collect to suggest whether DfE policy is effective or not.

Institution 3

HEIs typically operate robust QA systems, including rigorous scrutiny from external examiners who hold providers to account for the quality of education and training from an informed and experience perspective, in comparison to sector benchmarks. In contrast, Ofsted holds ITE providers to account based on their frameworks, with inspections often undertaken by inspectors with limited or no understanding of working in ITE themselves.

We have already commented on our concerns with a single-worded judgement. Attempting to provide an indication of the quality of the teacher education sector based on this approach serves to generate statistical analysis while excluding the rich qualitative evidence that peer-inspection could provide.

With regard to Ofsted's impact on ITE provision, the current system has a significant impact on increasing workload, stress and mistrust. The current framework, by design, provides a snapshot judgment with areas for development identified during the limited scope of an inspection process with years in between each episode. These areas for development focus on how to do better against the Ofsted framework, rather than providing genuine contextual support in improving the quality of education and training, which would be very welcome. It is difficult to see how the current approach can make a significant impact on improving provision, as it is designed to measure and indicate deficits in terms of the Ofsted framework.

In contrast, the recent ITE reform Stage 2 process provided a robust and collaborative approach to scrutiny, ensuring that ITE providers were held to account by experienced and credible DfE associates, recruited from the ITE sector. This process involved regular and developmental scrutiny, with valued input leading to genuine improvements in preparation for the 2024 ITE criteria. Alongside this, the external examiner system that HEI providers typically operate provides scrutiny of how the curriculum is implemented and includes placement visits and conversations with trainees and mentors and includes scrutiny of documentation and standards against sector expectations. This process is ongoing and longitudinal, providing genuine challenge and support to bring about iterative improvements in standards with checks at regular intervals. The External Examiner can see whether the changes are having an impact in real time. This system has demonstrably more impact on

improving the ITE sector than Ofsted inspections, while also providing a sustainable method of ensuring the well-being and mental health of ITE staff and leaders.

Institution 4

Timescales still remain the same regardless of the size of provision – this must impact on the inspection team as well as the provider team to arrange such a large number of visits and meetings within a short time frame. Being experienced, we pulled in a large administration team to support this, but this could be very challenging and provide additional pressure on larger inspections.

The timeframe for publication is still too long. We were way past the recommended 30 days with no report published – and this was with only one minor correction to the draft. In challenging circumstances this would add to the pressure felt, waiting for the findings to be published.

Could we have had clearer advance notice from the Ofsted team of the need for subject folders to be available in the session identified on the Ofsted timetable for the Subject Lead Inspector to review? This caused unnecessary anxiety and an immediate flurry of work that we could have avoided, particularly as it was at the beginning of the Ofsted inspection. We needed to calm nerves a bit (including our own) after that.

UCET
May 2024