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## An LSIS consultation response

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### Introduction

1. The Learning and Skills Improvement Service (LSIS) is the sector-owned body supporting the development of excellent and sustainable FE provision across the learning and skills sector. Its aim is to accelerate the drive for excellence and, working in partnership with all parts of the sector, to build the sector's own capacity to design, commission and deliver improvement and strategic change.
2. LSIS welcomes the opportunity to respond to this consultation on the proposed framework for the inspection of initial teacher education 2012. LSIS feels well placed to comment and contribute on the opportunities the development of the framework provides for improving the initial training of teachers, tutors and trainers in the further education (FE) and skills sector. LSIS is the body responsible for maintaining the professional standards and qualifications for those staff. Our response is given to the numbered consultation questions. Before that we make some general comments and suggestions.

### General comments

#### Information provided to support responses to the consultation

3. LSIS supports the use of a single framework across the three phases of initial teacher education (ITE). However, from the information provided, we are uncertain its proposed application to the FE and skills phase sufficiently recognises the diversity of the sector. It is also difficult to identify what is current practice in relation to many of the issues. The document rightly concentrates on proposed changes but does not refer the reader to sources of information on practice that will remain the same. For example, whether the proposed visits to awarding body centres are on consecutive days or at points throughout the programme. Practice can evolve over the cycle of inspections and the detail of that proposed for the 2008- 2011 cycle may have changed. A better understanding of inspection practice at the end of the 2008-2011 cycle would have been of value in developing this response to the consultation.

#### Contexts across the learning and skills sector

4. The proposed key question for judging quality across the partnership includes only a reference to age range and subject. Context is not included. For FE and skills this is crucial now the sector includes work based learning (WBL), adult and community learning (ACL) and independent and third sector providers as well as colleges. ITE for FE and skills prepares teachers, tutors and trainers to work across a sector that embraces significantly different approaches to learning and teaching. Judging how well a partnership prepares teachers must take this into consideration. How ITE

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addresses the needs of trainees in relation their context was an important consideration of the recent LLUK review of teaching qualifications for the sector. BIS asked LLUK to undertake the review because of sector concerns reported to them WBL and ACL were concerned that much ITE was delivered as though all trainees were working in colleges. Updated qualifications to be introduced by September this year provide far more opportunities to address these differences within the sector. LSIS is continuing to work with ITE providers to ensure sure these opportunities are made real.

5. Formal elements of ITE for the FE and skills sector are delivered by a range of providers. This includes HEIs delivering their own qualifications on their own campus. It also includes FE and skills providers from all parts of the sector – not only colleges. The proposed framework suggests that the focus of inspection for HEI partnerships will be on colleges. Only the inspection of awarding body provision proposes the inclusion of centres in the broader sector. This seems to ignore the fact that HEI partnerships include providers of ITE other than colleges. It is important that ITE delivered by a range of sector providers is included in any inspection.
6. Clear use of the term ‘centre’ in the proposals would support a better understanding of the scope of an inspection. The framework proposals refer to the selection of centres for visits – colleges for HEI partnerships and the broader sector for awarding bodies. It is unclear whether ‘centre visits’ refer to the centres providing ITE or the centres where trainee teachers are working – visited to observe trainees practising. This may be one and the same for some trainees but for many it will not. It is important that observation of practice across a range of sector providers is included in any inspection.

### Partnerships

7. The framework proposal centres on the inspection of partnerships. LSIS supports this change in focus over time from providers of ITE to partnerships. However, it is not clear how the proposed inspection framework will be adapted for the diversity of ITE partnerships in the FE and skills sector. For example, there are qualifications validated by HEIs but developed in the main and delivered only through partner colleges. There can be HEIs who are the sole deliverers of their in-service qualification on their campus. For the latter the only ‘partnership’ is with the employers of trainees on the programme. When guidance for the new inspection cycle is developed it would be helpful to recognise this diversity and in reports make the nature, size and complexity of partnerships clear. Although included in the current risk assessment, this information it is not listed in the new approach to risk assessment.
8. LSIS would support the inclusion of clear information on the role and responsibilities of employers in any future Ofsted guidance. Reference to the status of employers in terms of partnership and also recognition of employers’ different relationships with validating organisations would be helpful. For example, employers may deliver ITE or provide ITE placements for pre-service trainees. They may only be service users

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for the training of their staff. The distinction and associated responsibilities could be more clearly described. LSIS supports the involvement of all employers in all aspects of ITE, including course development, review and improvement planning. The recent LLUK review of teaching qualifications considered how all employers can be involved, including those as service users only.

9. LSIS considers clarity around role and responsibilities of each partner in judgements might be weighted across the partners – the validating body (HEI), the ITE provider and employers. LSIS is concerned that in the further education (FE) and skills context overall judgements on partnerships may reflect badly on an ITE provider as a result of partners over whom they have little control. For example, ITE providers often have formal requirements in relation to provision of mentors for pre-service placement of trainees. However, most training is in-service, with many programmes recruiting trainees from a wide range of individual employers. Many employers do not provide mentor support. LSIS supports the need to minimise any disparity of experience for trainees but also recognises there are significant barriers to overcome. LSIS would support any reporting by Ofsted that raises awareness of the fact that judgements are made in relation to partnerships. Public perception may continue to see any grading as relating only to the formal course provider.

### **Employment and employability**

10. The majority of FE and skills ITE trainees are already in employment. This is an important difference from the school phases. Any guidance should make clear for partners how the framework is applied for both pre-service and in-service trainees. For example, the framework states the desire for employers to take greater responsibility for training next generation. Employers in the FE and skills sector have taken this responsibility for many years, creating ITE delivery teams to train their own staff and others from the sector and more widely. It will be a challenge to continue this with limited public funds available. Under the leadership and management proposal it is suggested employers should play a greater role in recruitment and selection. Employers in the majority of cases have already made judgements about the suitability of someone for teaching/employment in the sector. Employing a teacher also suggests they have the potential to gain licensed practitioner status. It is ITE teams that have a limited role in recruitment and selection of these. It is they that need to support employers to understand the challenges of ITE. We understand that Ofsted has previously considered how an understanding of ITE requirements informs employers recruitment and selection practice.
11. The proposals include the intention to observe recently trained teachers directly. LSIS considers this is an unhelpful blurring of the distinction initial teacher education and professional formation and the responsibilities of those involved in each. It is also difficult to judge what the value of the findings would be. With current funding restraints it is unlikely there would be sufficient resource to ensure a valid sample given the diversity of the sector and its employment patterns. Little information is provided in the proposals about the sample to support an understanding of this.

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12. LSIS does not support the use of licensed practitioner status as measure of employability. We consider employment in the sector as sufficient evidence of being employable. Teachers newly recruited to the sector have five years to gain licensed practitioner status. We would question the use of the data likely to be available at any one time for judging outcomes of an ITE partnership. Again this blurs responsibilities of ITE partners between initial teacher education and professional formation and also of stakeholders with responsibilities for supporting those processes. Informing and encouraging teachers about licensed practitioner status is undertaken by those who deliver ITE. Ensuring and encouraging teachers to gain licensed practitioner status is the employer's responsibility. This should not be confused with any membership of an ITE partnership.

### Qualifications

13. The proposals do not make clear which initial teaching qualification provision is to be inspected. Again the FE and skills sector differs significantly to the school phases in the diversity of provision. Teaching qualifications are available that are related to requirements for the first year of teaching as well as to two teaching roles. They are also available in two qualification frameworks. The qualifications were developed in the Qualifications and Credit Framework (QCF). Equivalent qualifications have also been developed in the Framework for Higher Education Qualifications. We would assume that inspection would include the Certificate in Teaching in the Lifelong Sector (CTLLS) for those in an associate teaching role and the Diploma in Teaching in the Lifelong Sector (DTLLS) for those in a full teaching role and the HEI equivalents. Whether the introductory requirement (when awarded as a separate qualification) *Preparing to Teach in the Lifelong Learning Sector* (PTLLS) is included is less clear.
14. In addition, the proposals do not make clear which subject specific teaching qualification provision is to be inspected. A number of literacy, numeracy and ESOL qualifications can contribute to meeting regulatory requirements. Currently there are three types of qualification for each subject making nine in all. Joint literacy and ESOL qualifications soon to be introduced will raise the number to eleven. Integrated qualifications meet generic and subject specific requirements. LSIS considers these programmes to be most effective for training of teachers of literacy, numeracy and ESOL. These are not available as widely as we would like. Most trainees take a generic and a stand alone 45 credit subject specific qualification separately. It is not clear if there is any intention by Ofsted to select across this range to contribute to our understanding of the contribution of types of qualification to high quality outcomes. There is concern that the current inspection cycle does not include the stand alone subject qualifications or that ITE inspectors are not required to have the appropriate specialism.

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15. The proposals do not make clear an intention to inspect provision in relation to opportunities to progress from one qualification to another. This may include progression from PTLLS to CTLLS or DTLLS. Progression may also be from CTLLS to DTLLS if a trainee has changed teaching role or is using CTLLS as a stepping stone to DTLLS. Progression within the QCF is straightforward. Progression opportunities from awarding organisation programmes to HEIs are less so. A credit recognition and transfer agreement between awarding organisations and HEIs is detailed in LSIS guidance. Although progression from awarding organisation provision to HEIs is less common than pre 2007, opportunities should be made available by HEI programmes. With the range of qualifications available it is important to evaluate whether trainees are on the right programme and understand the progression routes available to them.

### **Awarding Bodies**

16. LSIS considers the proposals in relation to inspection of Awarding Body (AB) provision as inherently inequitable. This has been a concern of some stakeholders since the extension of the Ofsted remit in 2001 which did not allow for inspection of ABs. The barriers to equal treatment for the last ten years need to be addressed urgently. AB provision is not insignificant. In the Ofsted guidance for the 2011- 2012 inspection of AB provision Ofsted recognises that approximately 10,000 teachers are trained through this route, in 215 centres. This may increase with up coming changes to funding.
17. LSIS is concerned that awarding body partnerships will not be inspected and these will not be graded. Awarding bodies will play little part in the process other than to submit documents. Our concern has already been expressed that overall judgements could reflect badly on one partner unfairly. Centres may consider the feedback they receive may include aspects over which they have little control. This is of particular concern given the likely low level awareness of sector that there are two completely different approaches to ITE inspection. LSIS considers the approach to inspecting AB provision proposed will present a partial picture of that provision. We do not believe it can or should be compared with the judgements made of HEI partnerships. As with many examples of unequal treatment it is useful to reflect on what stakeholders' responses would be if the approach to HEI and AB provision were the other way around.

## Responses to numbered questions

### **Q1 To what extent do you agree or disagree with our proposed approach to judging overall effectiveness?**

#### **Agree**

LSIS supports the streamlining of judgements and retaining the focus on trainees' outcomes at the heart of the inspection. This will reduce the complexity of reporting and

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make the judgement about effectiveness of a partnership more transparent and easily understood. Importantly, the judgements will continue to be informed by much of what is currently evaluated. Detailed comments on the three new contributory judgements are given below. We support the continued use of the four point scale for grading and the proposals for judging outstanding and inadequate performance. We would suggest this approach could also be applied to good performance.

### **Q2 To what extent do you agree or disagree with our proposed approach to judging the quality of outcomes for trainees?**

#### **Neither agree nor disagree**

LSIS supports the streamlining of judgements and that the focus on how well trainees can teach is related to assessment requirements of the teaching qualification. LSIS is concerned that equality and diversity will not have a separate judgement. We support the change in emphasis to evaluation of equality and diversity across the framework but when something is embedded there is always a risk of attention being diluted or disappearing. For example, there is little to explain what is meant by a 'group' of trainees. It can only be assumed that this could include groups sharing particular protected characteristics. Ofsted guidance should make explicit how matters of equality and diversity will be addressed in every part of the framework

Retention of staff continues to be an important concern of LSIS. However, many of the current factors that influence retention are beyond the ITE provider and indeed beyond any of the partners, including employers. The current economic climate means that many staff are being made redundant and fewer jobs are being advertised. Beyond this LSIS recognises the difficulty in establishing a measure for retention. Employment in the sector is complex with many frequently gaining and then losing work. Teachers may work very part time, term time only or mainly to provide cover. The proposal states a judgement will be made based on monitoring by the partnership of trainees during professional formation but does not say how retention will be defined.

The definition of employability used in the proposals is narrow. There is little consideration of wider skills that trainee teachers develop or their understanding of the teaching profession and the opportunities it can provide for employment. LSIS supports the focus on literacy and numeracy and the FE and skills teaching qualifications do require a focus on the trainees' own skills in English, mathematics and ICT.

It is important that trainees' individual progress continues to be evaluated. This is particularly important for provision that is more inclusive in its recruitment and selection of trainees. The proposals clearly identify this as a responsibility for leadership and management but guidance should be clear that it is of concern under each contributory judgement.

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### **Q3 To what extent do you agree or disagree with our proposed approach to judging the quality of training across the partnership?**

#### **Agree**

LSIS supports the single judgement of quality across the partnership. We also welcome the opportunity the proposal provides for developing in-depth evidence on the quality of training and individual subjects and aspects. It is unclear how the proposal relates to surveys undertaken by Ofsted or how the subject/aspect will be determined in such a diverse sector. LSIS would welcome the opportunity for stakeholders to contribute to the selection of subjects/aspects in any one year.

The range of what will be evaluated is appropriate. Modelling effective practice by teacher educators is vitally important if trainees are to be prepared well. Teacher educators must teach inclusively if they are to prepare trainees to teach inclusively. Delivery and assessment of ITE programmes was a focus of the recent review of qualifications by LLUK. It is important that these reflect the broad context of the FE and skills sector and is appropriate for the teaching role being undertaken – associate or full. Resources need to reflect context as well as age and subject. This proposal seems more concerned with the management of resources. The use of the professional standards for teachers, tutors and trainers would be a useful addition.

Providing sufficient high quality practical experience can be problematic for all partners in ITE provision. The majority of trainees will be in employment which may be of a very limited focus. Again ITE providers should not be penalised for something beyond their control. With placements becoming more and more difficult to find even opportunities for pre-service trainees may become more limited than they once were.

### **Q4 To what extent do you agree or disagree with our proposed approach to inspecting the leadership and management of the partnership?**

#### **Agree**

LSIS supports the focus on leadership and management in relation to high quality outcomes for trainees. We support Ofsted evaluation in relation to attracting, training and retaining teachers in relation to local regional national. FE and skills ITE provision is still very patchy and only partnerships will address the needs of the sector. With a reduction in public funding information and advice will be even more critical to ensure trainees are on the right/appropriate qualification. Reporting on how providers attract teachers would be of value as this is likely to become more significant in maintaining supply.

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### **Q5 To what extent do you agree or disagree with our approach to risk assessment?**

#### **Agree**

LSIS recognises that risk assessment will become more significant with the proposal for a longer inspection cycle. We agree with the more proportionate approach and the importance of self evaluation. LSIS also supports the regular gathering of views about the quality of training and its outcomes and not just at the time of inspection. The LSIS viewpoint on the inclusion of employers has been given above. We note there is currently no proposal in relation to stakeholders but welcome the Ofsted consideration of new ways of approaching this. Gathering views of stakeholders is particularly important at this time when the endorsement process of ITE qualifications has become more light touch.

LSIS supports the sampling of outstanding and good partnerships in each year of the cycle. We are unsure of why new partnerships are unlikely to be inspected when they may provide the totality of a trainee's experience.

### **Q6 To what extent do you agree or disagree with our proposals to inspect outstanding and good partnerships?**

#### **Agree**

### **Q7 To what extent do you agree or disagree that our inspection of satisfactory partnerships should be based on the factors set out above?**

LSIS supports inspection of these at an early stage of new cycle good and monitoring at 12 – 18 months.

### **Q8 To what extent do you agree or disagree with our proposed approach to gathering inspection planning information?**

#### **Agree**

This will be key for informing the risk assessment. Additional data on outcomes is appropriate

### **Q9 To what extent do you agree or disagree with our proposed approach to replacing the preliminary on-site visit with telephone discussions?**

#### **Neither agree not disagree**

It is assumed the telephone conversations will cover the same ground as the visit. Face to face contact can be a more effective use of time and resource as it can avoid misunderstanding. LSIS would prefer a process that would allow for an on-site visit if

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thought more appropriate. Whatever the approach adopted this should be monitored to gauge impact.

**Q10 To what extent do you agree or disagree with our proposal to reduce the eight-week notice period to three weeks?**

**Agree**

**Q11 To what extent do you agree or disagree with our proposed approach to inspection activities?**

**Agree**

**Q12 To what extent do you agree or disagree with our proposed approach to inspecting awarding body provision?**

**Strongly disagree**

The LSIS viewpoint is given in above as part our general comments and issues .

In addition, we would seek to clarify the reporting of provision. Paragraph 41 says Ofsted will not report on individual centres but paragraph 43 says a feedback letter will be published – giving judgements and strengths and areas for improvement

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## Contact details

Enquiries about this response should be addressed, in the first instance, to:

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