



Framework for initial teacher education inspections 2020: inspecting the quality of teacher education

To what extent do you agree or disagree with the proposal to introduce two key judgement areas only?

Agree

Comments:

Broadly we agree with these 2 headings being appropriate.

Concerns and clarifications regarding the 'quality of education and training' heading are as follows:

From the consultation 'When reaching a quality of education and training judgement, inspectors will continue to consider the **outcomes** that trainees achieve, **but this will no longer be a central focus in making a judgement.**' What does this mean? What are the outcomes that will still be considered? Is this about a 'pass/ fail' approach to the Teachers' Standards? (Para 157)

We are concerned that there is ambiguity about the expectations for the 'progress monitoring' of individual trainees.

Is there a distinction between **education** and **training**? Does this create a false distinction – who is responsible for education (i.e. the 'central' programme) as opposed to training – which could be seen as the responsibility of partnership schools? How are these two strands created, delivered and quality assured? How is the complex relationship between the 2 strands interpreted – given that it can look very different in different contexts?

Ofsted must recognise that the ITT Core Content has been rushed through this year and that providers have had limited time to review and implement new training, curriculum and school-based training plans in the light of this. Materials will need to be published and facilitators briefed and booked by the middle of Summer Term 2020 in order to allow for sufficient planning for a September start. We therefore suggest that, as with the EIF, recognition is given to the journey that providers are on, particularly in the first round of inspections, with sufficient recognition given to the time it takes to implement genuine and lasting change. (See *Additional Points* 1 below)

Partnership schools may well be at very different stages in Terms of the development of their own curriculum. This clearly has significant implications for trainees based in those different schools. An unintended consequence of this could well be that providers will reduce the number of schools in challenging circumstances that they work with.

There seems to be a tension between the need to manage the workload for all colleagues and trainees involved with potentially increased demands on colleagues in schools and central teams. This relates to the point above about unintended consequences and the schools that partnerships work with.

The section on Leadership and Management and the associated criteria seem to be less problematic to us.

To what extent do you agree or disagree with the proposal to change the evidence-gathering approach for inspection evidence?

Agree

Comments:

We broadly agree with this proposal. However, we do have some concerns about the impact of some of the requirements on workload and would suggest that adaptation could be made to streamline processes further. The long list of bullet points against which providers are asked to provide evidence on the morning following the notification call is likely to place a substantial burden on the provider. Additional guidance around what will be accepted as evidence – for example, evidence of expertise of mentors and evidence of improvement planning – would be welcomed. Additionally, some consideration might be given to what evidence is needed immediately ie the morning after the notification call, and what can be more helpfully presented on the morning of the first day of the visit in the following week. This would allow providers more time to gather the evidence required.

It would be helpful to consider the use of some of the terminology in this section, which may benefit from some additional clarity. References to 'end point assessment', for example, may be confused with the Apprenticeship assessment process which uses this term to refer to a very specific process. Similarly, the Term 'subject lead' does not adequately encapsulate the programme structure of all providers (see our recommendations for a further exploration of this point.

With regard to electronic evidence gathering, we would welcome your response to the following questions:

1. Will providers have access to 'electronic evidence cards' made during the initial telephone conversations?
2. Will Ofsted be digitally recording conversations with stakeholders and what is the process if any party does not want their comments recorded? Would a GDPR safeguarding statement support here including reference to retention and anonymisation of electronic evidence?

To what extent do you agree or disagree with the proposed new inspection model of a one-stage inspection process for ITE inspections?

Agree

Comments:

We broadly agree with the proposal for a one-stage model of inspection. With the benefit of hindsight, we can see that the two-stage model was flawed in so much as additional factors could and did impact on NQTs' teaching and confidence which were beyond the responsibility of the provider. There was, however, a highly valued opportunity, under the old model, for providers to demonstrate *impact* and their capacity to improve and develop their provision between the two stages, which will now be lost. Care must be taken not to lose some of the nuances which the two-stage model afforded to inspectors when making final judgments.

Additionally, we support the continuing involvement of NQTs in the ITE Inspection process. They are uniquely placed to demonstrate the impact that their provider's curriculum has made to their early career practice and development. In this respect the timing of the Spring / Summer inspections is much more appropriate for gathering rounded and reliable perceptions.

We are concerned, however, about the potential opening up of inconsistencies between trainee (& NQT) comparisons in the Spring period (as opposed to the Summer). For example, many providers change trainee placements in the Spring Term into their contrasting placement. Consequently, their development and levels of perception are likely to be different to those which will be apparent in the Summer Term. (This point is crucial in terms of the strong reliance on gathering 'first-hand' evidence from trainees and mentors to inform and triangulate inspection judgements.)

Consequently, we advocate the case for **Summer Term inspections only** to maximise the opportunity for inspection teams to accurately determine how significantly the ITE curriculum and training is having a true impact on trainees. Trainees in their final stages of training are best placed to articulate and demonstrate their understanding of the impact on their practice of their centre and school-based training. NQTs have had two full terms' teaching experience to enable them to evaluate how their training has impacted upon their practice. The capacity of inspection teams understandably needs to be considered for a one term / one phase process – but the reliability in terms of judgements could be far more beneficial. The appointment of additional specialist ITE inspectors to work in the Summer Term of each year would go a long way to facilitating this.

We further recommend that inspectors interview NQTs (in groups or individually) as part of the process to secure their understanding of the longer term impact of the ITE Curriculum for all. Example questions could include:

- how has your ITE training provided you with the confidence and competence in securing effective 'quality first' teaching in your classroom?
- how did your ITE Provider contribute to your transition from training into NQT Induction?

To what extent do you agree or disagree with our proposal to introduce a short and longer telephone call with the ITE partnership representative, prior to the inspection?

Agree

Comments:

Whilst we agree with this proposal, we do feel that there is a lack of clarity about the short and long telephone conversation and the order/timings/key components of each call. It would also be helpful if these specific terms were referenced in the Handbook itself (possibly as sub-headings to the relevant sections) to ensure clarity and consistency once the final guidance is published.

With regard to the timing of calls, we would recommend Monday for short call, Tuesday to send information (point 49) and Wednesday for long call plus the logistics call.

Some additional, specific, clarification is needed around point 49:

- Does 'Day 1' refer to the day following call or the Monday after?
- Is it expected that providers will maintain self-evaluation forms and improvement planning documentation? There are some contradictory messages on this within the document.
- Similarly, more guidance would be appreciated on what is required in bullet 5, which refers to a core content audit – what format should this take to ensure consistency across the sector?
- Bullets 6 and 7 - when will providers be informed about what their focussed reviews will investigate?
- Bullet 15, regarding apprenticeship compliance. The sector is very new to the apprenticeship market and the compliance requirements for apprenticeships are extremely complex. Consequently, the scope of this bullet point is too wide and would merit further clarification. We recommend that evidence of the 20% off the job training and copies of commitment statements should be sufficient for the purposes of inspection.
- Bullet 16 and 17 – some additional guidance on what evidence is needed to document mentors and trainers' professional development would be welcomed.

Overall, clarity on the depth of evidence required would be helpful throughout this section to avoid unnecessary workload and production of large quantities of evidence and documentation which may not be wanted or needed by the inspection team. We would recommend requiring sight of the provider's own key documents and facts leaving 'evidence of . . .' statements to be explored through a discussion process in the longer phone call.

To what extent do you agree or disagree with the proposal that Ofsted will inspect ITE partnerships at any point within the Spring and Summer Terms only (excluding autumn Term) of any given academic year?

Neither agree nor disagree

Comments:

We have recommended earlier in this document that Summer Term inspection would be preferable. However, if logistics require Spring Term inspections, inspectors must take into account the different stages of trainee development each term, the timing of placements and how long they have been in their second school at the time of inspection.

Do you have any additional comments about our proposed new framework for ITE inspections?

Recommendations:

1. Timescale

We recommend that Ofsted recognises the tight timescale to which providers are being asked to respond to the proposed changes, which are not insignificant. With final publication expected in the Summer Term of 2020, there is less than a term available for providers to adjust their programmes, which will be expected to be 'up and running' from September ready for the first inspections in Spring 2021. We do not propose that the timescales are adjusted but note the following paragraph from the EIF, and recommend that a version of this is incorporated into this inspection framework to allay fears and explicitly recognise the time that will need to be taken for partnerships to make changes which are meaningful, lasting and effective:

Para. 180 Inspectors will bear in mind that developing and embedding an effective curriculum takes time, and that leaders may only be partway through the process of adopting or redeveloping a curriculum. If leaders have an accurate evaluative understanding of current curriculum practice in their school and have identified appropriate next steps to improve curriculum quality and develop curriculum expertise across the school, inspectors will evaluate 'intent' favourably when reaching the holistic quality of education judgement.

2. Trainee Assessment

We are concerned by a lack of clarity in the framework regarding trainee assessment and would urge Ofsted to review and amend the references made to the assessment of trainees in order to alleviate the strong possibility of widespread confusion across the sector.

At present there are conflicting messages within the framework which, at paragraph 45 states that Ofsted will **not specify** "*the content of, or approach to, trainee assessments*" but at paragraph 117 states "*Inspectors may check that such data avoids premature use of generic outcome descriptors, such as the teachers' standards*", at paragraph 161 states that: "*Ongoing assessment of trainees should be largely formative. Inspectors should check that trainees are gaining, applying and refining the knowledge and skills set out in the ITE curriculum. Assessment should also be used to help trainees embed knowledge and use it fluently, and assist trainers/mentors in refining a robust ITE curriculum. Therefore, partnerships should avoid the premature use of summative assessments, for example generic outcome descriptors such as the teachers' standards.*"; and in the inadequate category includes the statement: "*the ITT core content framework is, incorrectly, being consistently used as an assessment framework.*"

It is NASBTT's view that these paragraphs are, to a large degree, specifying "the content of, and

Do you have any additional comments about our proposed new framework for ITE inspections?

approach to, trainee assessments". Ofsted must either refrain from any specification at all or must provide clarity as to what can be used in the trainee assessment process.

3. **Mentoring**

The inspection framework, quite rightly, recognises the importance of high quality mentoring to support in-school training and development: *"We also know that mentoring is vital in high-quality teacher education. For this reason, our inspectors will want to see that the approaches to mentoring align with the partnership's ITE curriculum. This is key in ensuring that the substance of a trainee's education is embedded in their practical learning through their placements in nurseries, schools and colleges."*

NASBTT wholeheartedly agrees with these sentiments but urges inspection teams to recognise that ITT providers have no right of access to mentors within their school partnerships and in many cases, genuine and concerted efforts to provide high quality training to mentors are frustrated by lack of engagement with training, often caused by capacity and funding issues within schools.

NASBTT strongly suggested that schools were encouraged to engage with ITT programmes by including guidance for schools within the Education Inspection Framework, but these suggestions were not adopted. As there is no lever with which providers can guarantee engagement with mentor training programmes, Ofsted should include specific guidance for inspectors which recognises the intent to provide high quality training, whilst acknowledging that a favourable inspection outcome must not hinge on mentor engagement and/or adoption of training, over which providers have little or no control.

4. **Subject Specific Leads**

Ofsted's current inspection model appears to be based around a 'faculty' style approach which does not suit all sizes and contexts of partnership. Primary provision in particular, whilst offering a good breadth of subject-specific experiences for trainees, may not be able to identify a 'subject lead' for every NC subject as subject knowledge acquisition is often overseen by the general programme lead. Smaller secondary providers may also adopt a variety of models to ensure that sufficient quality of experiences are offered to their trainees, without necessarily employing a named and separately identifiable 'lead' for every subject offered.

NASBTT recommends that Ofsted explores the quality of trainee subject-specific training and experience without presupposing that the only way to achieve good outcomes is through a faculty-style approach.

5. **Exceptional vs Outstanding**

Paragraph 147 states that: *'Our aim in making this change is that a partnership should only be judged outstanding in a particular area if it is performing exceptionally. This exceptional performance should be consistent and secure across all judgement areas in order to be judged outstanding overall'*. We are unclear as to the difference(s) between the terms 'exceptional' and 'outstanding' and recommend that further clarification is made to ensure consistent application of expectations.

Is there anything you would like us to improve on or do differently for future consultations?

Overall, we are pleased with the time and care that has been put into getting this process right, particularly the use of research visits and the pilot inspection process.

