



**Arts Council England’s response to The Office for Standards in Education, Children’s Services and Skills Education inspection framework 2019: inspecting the substance of education consultation**  
April 2019

[The purpose and background of the consultation can be found here](#)

**Framework proposals (*Appendix A provides information about each of the 11 proposals discussed below*)**

***Proposal 1***

***To what extent do you agree or disagree with the proposal to introduce a ‘quality of education’ judgement?***

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don’t know
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments:**

Arts Council England is the national development agency for the arts, museums and libraries in England. Our mission is 'great art and culture for everyone' and we work to achieve this by championing, developing and investing in arts and cultural experiences that enrich people's lives. We believe that every child and young person should have a rich cultural life where they live, go to school and spend their social time.

We are a large, wide-ranging funder. We supported 3,861 projects with over £71m in 2017-18, through our open programme of Arts Council National Lottery Project Grants. 829 organisations receive regular core funding from us (£408m per year) – our National Portfolio Organisations, approximately 80% of whom deliver programmes and activities for children and young people, including with schools. We have a wider, varied portfolio of targeted/strategic programmes, which includes significant investment in children and young people. We also distribute and programme-manage over £78m per year of strategic education investment on behalf of the Department for Education – including for Music Education Hubs, the National Youth Dance Company, In Harmony, Bridge Organisations, the Museums and Schools programme and the National Art and Design Saturday Clubs.



4,200 schools in England are registered Artsmark schools, the creative quality standard accredited by Arts Council England. Artsmark provides a clear framework for teachers to plan, develop and evaluate arts, culture and creativity across the curriculum.

Arts Award, meanwhile, is a suite of unitised, accredited qualifications for ages 5-25 which supports young people to engage with the arts; build creative and leadership skills; and achieve a recognised national qualification (including UCAS points at the higher levels). Arts Award is managed by Trinity College London in association with Arts Council England. 30,000 children and young people gained arts awards through schools in 2016/17 alone, and just over half of the nearly 4,250 organisations currently supporting Arts Award are in the formal education sector.

As noted above, we work closely with the Department for Education to deliver and support numerous England-wide cultural and creative learning programmes. We are currently leading on two long-term research programmes in partnership with the higher education sector: the Durham Commission on Creativity and Education (which aims to identify ways in which creativity, and specifically creative thinking, can play a larger part in the lives of young people), and Talent 25 (an action-research programme, in partnership with De Montfort University, Leicester, investigating the creative pathways for children from birth to the age of 25).

In considering this consultation, it is important to draw attention to Damien Hinds' recent speech (7 February 2019) which highlighted the Five Foundations for Building Character (sport, creativity, performing, volunteering and membership, and world of work) as 'a crucial part of a child's development'. We welcome his recognition of both creativity and performing.

[Government figures](#) show that in 2017 the creative industries were worth £101.5bn to the UK economy (up from £94.8bn in 2016), making it one of the fastest growing sectors, with growth at twice the average UK rate since 2010. As such, the sector offers substantial (and growing) opportunities for experience of and entry to the world of work. Many arts and cultural organisations also offer volunteering and membership opportunities.

Throughout our response we refer to arts subjects, cultural experiences, creative learning, and creativity, and define these as follows:

- Arts subjects: art and design, dance, drama and music
- Cultural experiences: visits to cultural venues such as museums, libraries and theatres, workshops, after-school and extra-curricular clubs that involve arts or creativity, in-school visits from the cultural sector such as theatre practitioners, dancers, musicians etc.
- Creative learning: how the arts can be used to teach other skills across the curriculum, for example using role play or singing, as well as enhancing personal

progression with, for example, critical thinking skills, resilience, character and good mental health

- Creativity: we consider this to be the ability to make or conceive a solution or concept that wasn't there before, which cuts across all subject areas. Everyone is creative and has the potential to develop their creativity further. Creativity and creative thinking result from a combination of knowledge, skills, attitudes and values, which together form creative competence. Creativity is a mixture of functional and interpersonal attributes.

We note with concern the substantial and growing evidence that the arts are in decline within the state school system. Research by the Education Policy Institute shows that entries to arts subjects by KS4 cohorts have declined in recent years, with the 2016 entry rate falling to the lowest of the decade. The average number of arts entries per pupil fell from 0.80 in 2013 to 0.70 in 2016, and the proportion of pupils taking at least one arts subject declined from 57.1 per cent in 2014 to 53.5 per cent in 2016. Provisional data from later years suggests that this trend is continuing.

At primary level, the Primary Colours report from The Fabian Society (published in 2019) also evidences that two thirds of primary teachers believe there is less arts education taught now compared to 2010, with 48% of respondents saying the quality of what remains has also declined.

We would welcome a new Education Inspection Framework that recognises the importance of the arts (including arts subjects), culture and creativity as part of an excellent education.

Accordingly, we support the move to introduce a broader focus on inspecting the "quality of education"; and strongly encourage Ofsted to be explicit, within this, about the importance of arts subjects, cultural experiences, and creativity in the wider curriculum.

We recommend that:

- Arts subjects should be specifically referenced in definitions of "quality of education" and "broad and balanced curriculum".
- Arts subjects should always be inspected by well-trained inspectors, using a clear framework to make judgements on curriculum design, diversity of offer, teaching, learning, sequencing, assessment, CPD and the contribution of professional artists and arts organisations in arts subjects. This must apply to schools of all types and phases.
- Ofsted should consider how Artsmark can support the inspection of quality arts provision (including through the way it is currently incorporated into school improvement plans).

- Arts subjects, cultural experiences and creativity should be recognised for their contribution to learners' wider personal development, particularly in support of good mental health.
- No school should be awarded a Good or Outstanding judgement without a strong arts and cultural offer; we have commissioned the Royal Shakespeare Company to look at the arts offer in outstanding schools across England, and we would be happy to share the findings when completed at the end of this academic year.

**In addition:**

There is some evidence, including Ofsted's own research, that some schools are **shortening Key Stage 2**; this is likely to cause some children to have access to fewer subjects (including arts subjects) at this stage in their formative education, and less time to deepen their learning and engagement with these subjects.

We are pleased that the framework supports **reading at an early age** and that inspectors will be looking at how staff will develop children's love of reading. The framework commits to a 'sharp focus' on reading skills at Key Stage 1 – as well as the importance of the mechanical skill of reading, it is also crucial to develop every child's positive relationship to reading and books.

As well as the importance of cultivating a love of reading (acknowledged in the framework), there is a growing body of research to highlight the wider benefits of this deeper immersion. Major longitudinal studies (including [Sullivan & Brown, 2013](#) [PDF]; [Guthrie, et al, 2001](#); and [Kirsch, et al, 2002](#) [PDF]) have found that reading for pleasure is the most explanatory factor of both cognitive progress and social mobility over time, beyond even parental socioeconomic status and educational attainment. Meanwhile, research from the [National Literacy Trust](#) shows that 10-year-olds who enjoy reading have a reading age 1.3 years higher than their peers who don't enjoy reading, rising to 2.1 years for 12-year-olds and 3.3 years for 14-year-olds. Also, [Kidd and Castano, 2013](#) found that reading literary fiction can have a significant impact on a young person's understanding of 'theory of mind' - our human capacity to comprehend that other people hold beliefs and desires, and that these may differ from one's own.

We strongly support reference made to **cultural capital**. We suggest the framework highlights the significant role the arts and cultural heritage plays in this area. Engaging in arts and cultural activities helps generate knowledge, skills and education, and supports wellbeing and social relationships as well as attainment and social mobility.

We support that inspectors must consider the **spiritual, moral, social, and cultural development** of pupils at the school before making the final judgement on overall effectiveness. As the Secretary of State's February 2019 speech indicates, the arts and culture can play a particular role in supporting SMSC - including through building confidence, sense of wonder, an appreciation and understanding of difference, and

civic agency and participation. This recent Artsmark blog outlines an in-school case-study of the use of the arts in SMSC. (<https://www.artsmark.org.uk/blog/how-use-arts-teach-social-and-emotional-skills>).

We would welcome further discussion as to how Arts Council England might support Ofsted with a Subject Curriculum Group for arts subjects, to follow on from groups recently established for other subject areas including History, Science, English and Maths.

We support that judgements will look for an inclusive curriculum for children with additional needs, such as those with high levels of SEND. This should include the full set of arts subjects, and also wider creativity in the curriculum.

### ***Proposal 2***

**To what extent do you agree or disagree with the proposed separation of inspection judgements about learners’ personal development and learners’ behaviour and attitudes?**

Strongly agree  <input type="checkbox"/>	Agree  <input checked="" type="checkbox"/>	Neither agree nor disagree  <input type="checkbox"/>	Disagree  <input type="checkbox"/>	Strongly disagree  <input type="checkbox"/>	Don't know  <input type="checkbox"/>
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### **Comments:**

#### **Personal Development**

We support the framework’s recognition of the important role schools play in supporting pupils’ development in many aspects of their lives. We agree with the proposal to separate the judgements in order to focus on the school’s intent to provide personal development; and also on the quality of this provision.

We recommend that arts subjects and creativity are cited as an example of how to support personal development, particularly in relation to:

- Developing understanding of difference
- Developing character
- Developing confidence, resilience and cultural knowledge beyond the curriculum
- Supporting good mental health

There is substantial and growing evidence that the arts, culture and creativity can contribute to supporting children and young people’s mental health; this was re-emphasised in a recent [5-year review](#) of the scientific literature for arts, health and wellbeing made by Arts Council England. On 25 February 2019, The [All-Party](#)

[Parliamentary Group on Arts, Health and Wellbeing](#) met to discuss the contribution of culture and creativity (in and beyond education) to child and adolescent mental health, and the aforementioned Durham Commission on Creativity in Education is also exploring the impact upon pupil wellbeing (we would be very happy to share this material in greater depth with Ofsted). In summer 2018, our Chair Sir Nicholas Serota met with Chief Inspector Amanda Spielman to discuss the Durham Commission, and would be very keen to do so again as the recommendations emerge.

We would encourage inspectors to judge if learners are developing individual creativity and would welcome further conversation about how this judgment might best be formed (building upon our learning from current research). We also note that creativity is becoming increasingly relevant to success in the workplace and should therefore be viewed as a key part of pupils' personal development. [Research](#) from NESTA and others highlights that as the UK and global economy shifts (including in response to automation and robotization of both manual and cognitive work in many sectors), creative skills will be the most valuable in helping workers to adapt; whilst creative roles will be amongst those most resilient to change.

The Programme for International Student Assessment (PISA) is drawing up new questions to measure the quality of creativity among pupils, intending to introduce these changes from 2021. Should the Department for Education adopt this measure in England, a conversation about how this could be incorporated within future Ofsted frameworks would be welcome.

**Early years (registered provision)**  
***Proposal 3***

***To what extent do you agree or disagree that the judgements will work well for:***

	Strongly agree	Agree	Neither agree or disagree	Disagree	Strongly disagree	Don't know
Childminders	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Childcare on non-domestic premises	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Childcare on domestic premises	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Childcare settings that offer care exclusively before and after school	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments:**

There is a strong body of evidence that early years’ experiences of arts and culture have significant impact on children’s learning and development; in many cases, this impact is life-long. We would recommend that the importance of the arts, culture and creativity are included here in support of children’s educational and personal progression, as in Proposal 1. We support the framework’s intention to put more emphasis on the quality of education and care and how experiences are being developed.

We suggest that it is explicitly stated that inspectors should consider how well children are supported by early years practitioners to learn through creative experimentation and play across a range of artistic practices including music and singing, dance, drama, art, and making. We would also suggest that inspectors consider the role of cultural experiences in supporting early years provision in the above range of settings (e.g. visits to early years activities in galleries and museums).

As above, we welcome the proposal for judgements to seek an inclusive curriculum for children with high levels of SEND, as well as other additional needs. This should be ambitious, and include creativity as a way to meet the needs of children in the early years foundation stage.

***Maintained schools and academies  
Proposal 4***

***To what extent do you agree or disagree with the proposed focus of section 8 inspections of good schools and non-exempt outstanding schools and the proposal to increase the length of these inspections from the current one day to two days?***

Strongly agree  <input type="checkbox"/>	Agree  <input checked="" type="checkbox"/>	Neither agree nor disagree  <input type="checkbox"/>	Disagree  <input type="checkbox"/>	Strongly disagree  <input type="checkbox"/>	Don't know  <input type="checkbox"/>
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**Comments:**

We support the intention for a section 8 inspection to focus on aspects of the school’s provision drawn principally from the quality of education judgement, and note the additional specific elements of pupils’ behaviour, personal development and safeguarding.

With regards to our above comments on the inclusion of arts subjects, cultural experiences and creativity, we would strongly recommend that their provision is always considered in an inspection. The additional day could enable inspectors to

gauge the arts and cultural offer in more detail and to understand the role that arts, culture and creativity play within the school’s ambitions and support for pupils’ personal development.

It is important to note the extra autonomy afforded to academies and free schools to develop their own curricula. This risks creating a more pronounced divergence of the arts and cultural offer across this part of the schools ecology. Maintained and independent schools, academies and free schools should be expected to provide a broad and balanced curriculum including the arts; and to provide a good, complementary offer of visits and extracurricular activities.

***Proposal 5***

***To what extent do you agree or disagree with the proposed introduction of on-site preparation for all section 5 inspections, and for section 8 inspections of good schools, on the afternoon prior to the inspection?***

Strongly agree <input type="checkbox"/>	Agree <input checked="" type="checkbox"/>	Neither agree nor disagree <input type="checkbox"/>	Disagree <input type="checkbox"/>	Strongly disagree <input type="checkbox"/>	Don't know <input type="checkbox"/>
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**Comments:**

We support the proposed introduction of on-site preparation the day before an inspection, but would suggest that there are considerations about the possible impact this might have on staff. The handbook refers to inspectors possibly using this time to take pictures of any work on display; we would encourage inspectors to include displays from arts subjects within this and to consider the use of creative learning evidenced by such displays. The additional time on site could allow inspectors to meet a wider range of teachers – for example, arts specialists/subject leads – and to gain a broader understanding of the arts and cultural environment of the school before commencing the inspection proper the following day.

**Proposal 6**

**To what extent do you agree or disagree with our proposal not to look at non-statutory internal progress and attainment data and our reasons why?**

Strongly agree  <input type="checkbox"/>	Agree  <input checked="" type="checkbox"/>	Neither agree nor disagree  <input type="checkbox"/>	Disagree  <input type="checkbox"/>	Strongly disagree  <input type="checkbox"/>	Don't know  <input type="checkbox"/>
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**Comments: *If you disagree, please be specific about the types of data that you think inspectors should consider.***

The proposed approach of having a ‘core’ of evidence directly gathered by Ofsted, but also allowing for the rationale for wider data collection to be discussed and considered, seems like a good balance that will encourage consistency and reduce additional pressures for data collection, whilst allowing for acknowledgement of relevant supplementary data.

We recommend schools develop methods to collect data relating to the quality of their creative and cultural offer – this can be evidenced through the Artsmark self-assessment process; uptake of Arts Award or other relevant qualifications e.g. ABRSM, Trinity and LAMDA, which sometimes carry UCAS points; engagement with other cultural education organisations such as Music Education Hubs; and progression routes for children beyond the school through relevant performing ensembles (orchestras, choirs, dance groups etc).

We also recommend that inspectors have meaningful discussions with arts subject leaders about how they know that the arts curriculum is having an impact in their school.

**Non-association independent schools**  
***Proposal 7***

**To what extent do you agree or disagree with the proposal that inspectors should normally use the non-specialist curriculum as their primary source of evidence in assessing the extent to which the school meets the quality of education criteria?**

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments:**

We accept the rationale for having a strong, consistent focus across the curriculum in these specialist settings. We note that some schools within this category will be specialist arts settings. Many other schools within this category will have non-arts specialisms, but we believe that it is also vital for pupils in these other settings (eg faith, technology, sports) to benefit from a broad and balanced curriculum that includes the arts, and for this to be considered as part of the non-specialist curriculum.

Whilst the quality of education across all subjects is crucial, in specialist schools (including arts settings) inspectors with relevant subject expertise should also inspect the specialist curriculum provided to ensure high quality provision. This should be considered alongside the core curriculum, not as a supplement to it, in deciding a school's overall quality of education judgement.

***Proposal 8***

**To what extent do you agree or disagree that where non-association independent schools have been found to improve or decline at an additional inspection, Ofsted should provide up-to-date judgements about the school's current performance?**

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments:**

We see the value of (re)grading through interim/emergency inspections for independent schools – as this would provide parents, staff and pupils with accurate, up-to-date performance info. It would also bring the independent sector into closer alignment with the regime for the maintained sector, and this consistency would also be valuable for all stakeholders. As part of this, as above, we would encourage inspectors to include judgements on whether standards have improved or declined relative to arts subjects.

**Further education and skills**

***Proposal 9***

**To what extent do you agree or disagree that the proposal to reduce the types of provision we grade and specifically report on will make our inspection reports more coherent and inclusive?**

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments: *If you disagree, are there any specific areas you are concerned about?***

Arts Council England has a substantial interest in skills, further education and the post-16 sector. We directly fund two of the sector skills councils (Creative and Cultural Skills, and Screenskills). We have been a strong advocate of the uptake of apprenticeships in the creative and cultural sectors (including through the 2013-2015 Creative Employment Programme). We are also interested in adult learning, as a means by which people maintain their lifelong engagement in culture and creativity.

We support this proposal, including the decision to assess SEND and high-needs provision within the inspection regime for other provision in each relevant category; and the new segmentation of education programmes for young people, apprenticeships, and adult learning.

The plan to merge the areas of provision for inspection also seems sensible given that there will be similar staff involved across these areas. It could also encourage the curriculum to be joined up to allow progression between different courses and stages, helping to avoid too much proliferation across the multiple different courses and qualifications in the post-16 space.

In particular, we hope that this will enable a broader overview of the role of education partners (alongside employers) in apprenticeships. We would like inspections to review how much input employers have, and the effectiveness of that input in supporting learners to achieve their goals and supporting their longer-term employability. Inspections should also consider how well the provider is networked with employers and how well the provider understands and can tailor a curriculum to employability.

As above, our recommendation would be that, where possible/appropriate, specialist arts provision is reviewed by inspectors with relevant specialist subject/context expertise.

We note that the draft FE and Skills Inspection Handbook makes no mention of cultural capital, in contrast to the sister documents for other settings also covered by this consultation. We feel that this omission should be addressed, as for students in FE – as at all other levels of education – cultural capital is a highly important factor in addressing social disadvantage.

We are aware of recent [concern in the sector](#) about the regulation and inspection of some higher-level apprenticeships (i.e. L 6-7); there has previously been a gap, and it would be valuable to ensure consistency of quality regulation at all levels, to give learners clear sight of what they will achieve through progression. Further clarification over how the new inspection framework will address this challenge would be welcome.

We are very interested in the wider roll-out of T-levels and will welcome the opportunity to respond to plans for inspection of relevant provision in due course.

***Proposal 10***

**To what extent do you agree or disagree with the proposed model for short inspections?**

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments:**

This model seems sensible, and we welcome the change that will see the inspection team leaders spend additional time ‘on site’ at a college or provider.

As above, where providers have particular specialisms in the arts, we re-emphasise the value of including relevant expertise within inspection teams.

***Proposal 11***

**To what extent do you agree or disagree that the timescale within which providers that are judged to require improvement receive their next full inspection should be extended from ‘12 to 24 months’ to ‘12 to 30’ months’?**

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments:**

On balance, we feel that the window for re-inspection should stay at 12-24 months – if an education provider is adjudged to require improvement, it is in the interests of pupils, parents, staff, local businesses and the wider provider ecology that their re-inspection comes sooner rather than later.

**Inspection of colleges at campus level**

***Please use this box to record any additional comments in relation to the detail set out in the further education and skills draft inspection handbook.***

We will follow Ofsted’s evolving thinking in this area, with particular interest in how this may include/take consideration of specialist arts colleges and campuses within larger college groups. We would welcome the opportunity to participate in discussion, and in future phases of consultation.

Throughout this response, we have highlighted the importance of arts subjects and creativity as part of a well-rounded curriculum and schooling experience; this applies to learners in all settings, including college learners. We would encourage the inclusion of arts subjects and creativity in the inspection judgements for individual colleges.

## About you

### Confidentiality

The information you provide will be held by us. It will only be used for the purposes of consultation and research to help us to become more effective, influence policies and inform inspection and regulatory practice.

We will treat your identity in confidence, if you disclose it to us.

### Are you responding on behalf of an organisation?

- Yes  please complete Section 1 and the following questions  
No  please complete Section 2 and the following questions

### Section 1

If you would like us to consider publishing the views of your organisation, please indicate this below.

**Organisation:** Arts Council England

### What did you think of this consultation?

One of the commitments in our strategic plan is to monitor whether our consultations are accessible to those wishing to take part.

### How did you hear about this consultation?

- Ofsted website
- *Ofsted News*, Ofsted's monthly newsletter
- Ofsted conference
- Twitter (@ofstednews)
- Another organisation (please specify, if known)
- Other (please specify): HM Government consultations alerts

**Please tell us what you thought of this consultation by answering the questions below.**

	Agree	Neither agree nor disagree	Disagree	Don't know
I found the consultation information clear and easy to understand.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I found the consultation easy to find on the Ofsted website.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I had enough information about the consultation topic.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I would take part in a future Ofsted consultation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Is there anything you would like us to improve or do differently for future consultations? If so, please tell us below.**

N/A
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## **Appendix A: details for each of the 11 proposals**

### **Proposal 1**

We propose the introduction of a new 'quality of education' judgement built around our working definition of the curriculum. It will focus on a provider's educational intent, implementation and impact. Inspectors look at teaching, assessment, attainment and progress under the current inspection framework, and they will continue to do so, but these considerations will contribute, viewed in the context of the provider's curriculum, to a single quality of education judgement. In short, we propose to take a holistic approach to considering the quality of education rather than artificially separating the leadership of the curriculum from teaching, and separating teaching and the use of assessment from the impact this has on the outcomes that learners achieve. This will de-intensify the inspection focus on performance data and place more emphasis on the substance of education and what matters most to learners and practitioners.

### **Proposal 2**

We propose to judge 'personal development' separately from 'behaviour and attitudes' to enhance the inspection focus on each and enable clearer reporting on both. This approach recognises the very different elements in focus. We believe that the behaviour and the attitudes learners of all ages bring to learning is best evaluated and judged separately from the provision made to promote learners' wider personal development, character and resilience.

### **Early years (registered provision)**

#### **Proposal 3**

We want to ensure that the education inspection framework 2019 judgements (see section above and para 131 in the EY handbook]) are appropriate for the range of early years settings.

### **Maintained schools and academies**

#### **Proposal 4**

Since their introduction in 2015, section 8 inspections of good and non-exempt outstanding schools have been valued by the sector. The changes made to the operation of these inspections from January 2018 have been welcomed by most schools inspected since then. The purpose of a section 8 inspection of a good school is to confirm that a school remains good. This will not change. However, as we have stated previously, the new education inspection framework represents an evolution in what it means to be a 'good' school.

We have set out within the school's handbook (paragraphs 270-282) the fact that a section 8 inspection of a good school will focus on aspects of the school's provision,

as a subset of the full education inspection framework criteria. These are drawn principally from the quality of education judgement, but also include specific elements of pupils' behavior, personal development and safeguarding.

Currently, section 8 inspections of good schools (or 'short inspections') last for one day. We want to ensure that there is opportunity to gather sufficient evidence while on inspection to confirm that a school remains good under the new criteria. Therefore, we are proposing to increase the time for which the lead inspector is on site to two days.

### **Proposal 5**

In addition to the wider education inspection framework proposals we are introducing, we also propose a new approach to how our inspectors prepare for and begin inspections. This is in response to feedback that initial contact can be data-driven and not allow schools to communicate fully with inspectors.

We propose the introduction of on-site inspector preparation for all inspections carried out under section 5 and section 8 of the Education Act 2005. Currently, inspectors carry out pre-inspection preparation remotely on the day prior to on-site inspection. We propose that, from September 2019, this preparation takes place at the school on the afternoon before the inspection, enabling inspectors and leaders to carry out preparation collaboratively wherever possible.

On-site preparation will allow for better communication between the lead inspector and the school, allowing the school a clear role in preparation work. It will help to reduce the burden on schools of making logistical arrangements on the morning of the inspection and providing documentation. It will provide more time to establish good, professional relationships between school leaders and the lead inspector.

We propose that Ofsted will provide formal notification of the inspection no later than 10am on the day before the inspection. We then propose that the lead inspector will arrive on site no earlier than 12.30pm on that day. The lead inspector will use this time to talk with senior leaders to gain an overview of the school's recent performance and any changes since the last inspection.

Conversations will focus particularly on how the school has built on its strengths, what weaknesses leaders have identified and what action they have planned or have in train to address those weaknesses. It will also be an opportunity to make practical arrangements, including about the documentation or other evidence that inspectors will need to see during the inspection. Inspectors will complete their on-site inspection preparation and leave the school premises by no later than 5pm on the day before the inspection starts. Paragraphs 51 - 56 of the school inspection handbook set out in more detail what we expect on-site preparation to cover.

### **Proposal 6**

The recent Teacher Workload Advisory Group report noted that ‘time associated with data collection and analysis... is most frequently cited as the most wasteful due to a lack of clarity amongst teachers as to its purpose.’

Ofsted is committed to ensuring that our inspection work does not create unnecessary work for teachers, and as such we propose that inspectors will not use schools’ internal performance data for current pupils as evidence during an inspection. This is because:

- internal data for current pupils has its limitations, and inspectors will not be able to assess whether the data is an accurate and valid representation of pupils’ learning of the curriculum
- inspectors will gather direct evidence of the quality of education in schools
- inspectors will have meaningful discussions with leaders about how they know that the curriculum is having an impact.

Inspectors will, however, ask schools to explain why they have decided to collect whatever assessment information they collect, what they are drawing from this information and how that informs their curriculum and teaching. We believe that this will help to reduce unnecessary workload for teachers; we do not believe that it will have a negative effect on our ability to judge effectively the quality of education in a school.

### **Proposal 7**

Some non-association independent schools offer a specialist curriculum and Ofsted recognises their autonomy to do so. For example, some schools offer a specialist faith-based curriculum, while others offer a specialist education in the performing arts. Inspectors will assess a school’s entire provision, including any specialist provision offered, when assessing compliance with the ISS and when reaching judgements under the education inspection framework in the following judgement areas: overall effectiveness; behaviour and attitudes; personal development; and leadership and management.

When reaching a judgement under the new quality of education judgement area, the non-specialist curriculum will normally be inspectors’ primary source of evidence. It is important that, where schools offer a specialist education, pupils also study a broad, rich curriculum alongside it. This is supported by Ofsted’s research, and is a requirement of the ISS.

However, where a school chooses to deliver a substantial number of the required subject areas through the specialist curriculum (for example through faith-based content or other forms of immersive study), or where there is insufficient evidence from the non-specialist curriculum that the quality of education criteria is met,

inspectors will consider evidence from the specialist curriculum in arriving at their judgement.

### **Proposal 8**

Currently, where the DfE commissions Ofsted to conduct additional inspections of independent schools, such as progress monitoring or emergency inspections, Ofsted checks whether the ISS are being met but does not make new graded judgements about the school. As a result, a school retains the judgements from its most recent full standard inspection, even where it has improved and is now meeting the standards or has declined and is no longer meeting them. A new graded judgement is not provided until the school’s next standard inspection.

We are aware that some schools may wish new inspection judgements to be made more quickly than they currently are, to reflect their improvement. We are also aware that when a good or outstanding school is no longer meeting the standards but retains its most recent standard inspection judgements, this can be misleading for parents and others.

To provide parents, school leaders and the DfE with better information, we are proposing to recognise and acknowledge sooner where schools have improved or declined, for example by bringing forward a standard inspection.

### **Proposal 9**

*We believe that it would make our inspections and reports more coherent and inclusive if we were to reduce the types of provision that we grade and specifically report on as follows:*

<b>Proposed education inspection framework types of provision</b>	<b>Current types of provision</b>
Education programmes for young people	16–19 study programmes, including: <ul style="list-style-type: none"> <li>■ academic, technical and vocational study programmes</li> <li>■ study programmes for those with education, health and care plans, aged 16 to 24 (and those with high needs)</li> <li>■ 16–19 traineeships</li> <li>■ full-time provision for 14–16 year olds.</li> </ul>
Apprenticeships	Apprenticeships at levels 2 to 5, whether frameworks and standards, levy or non-levy funded.
Adult learning programmes	Adult learning programmes 19–24 traineeships.

*We will cover education and training for people with SEND and/or high needs thoroughly and appropriately within the relevant type of provision rather than separately. We consider that this will ensure that they are fully and properly represented and not marginalised or isolated within the inspection and report.*

T-levels, a major reform of technical education at level 3, will be introduced from September 2020. That will take place after the beginning of this new framework. We intend to review how we should best integrate the coverage of T-levels into this framework closer to the time of their introduction and will consult further on this in due course.

### **Proposal 10**

Under the current common inspection framework, Ofsted carries out short inspections of most good further education and skills providers. This happens within five years of the previous inspection. Some good providers instead receive a full inspection for reasons of risk. We intend to continue with short inspections for most good providers on the same basis. However, given greater focus on the quality of education in the education inspection framework 2019, we believe we need to change the way we carry out the short inspection of good providers in some respects.

Under our current methodology, we undertake to confirm that a provider remains good by exploring a number of lines of enquiry that differ for each provider. As we are introducing a new inspection framework with a focus on the quality of education and the curriculum, we propose introducing an approach that focuses on the quality of education and training, safeguarding and effective management, and that this should be the same for all providers. We are continuing to pilot our proposed approach. The proposed areas we are piloting are:

- Is the quality of education/training good?
- Has the provider addressed the areas for improvement/next steps identified in the last inspection report well?
- Are the provider's safeguarding arrangements effective?
- Are careers education and guidance of a good quality?
- Has the provider managed and implemented changes to provision effectively since the last inspection?

We will refine the above areas based on our pilot activity and from feedback following this consultation. In order to ensure that short inspections are planned effectively with providers, and to ensure coverage, we are proposing to increase the time the lead inspector, or in the case of larger providers, the lead inspector and another member of the inspection team, spend on site. We propose that the lead inspector, or in larger providers, two inspectors, arrive at the provider on the day following notification and complete the planning for the inspection on site with the

provider (see paragraphs 126-133 of the draft further education and skills inspection handbook). They would then start inspection activity prior to the full inspection team arriving the following day.

### **Proposal 11**

We are proposing to extend the timescale within which we should inspect providers judged to require improvement from 'normally 12 to 24 months' after the last inspection to 'normally 12 to 30 months' after the last inspection. This will provide greater flexibility to give providers more of an opportunity to improve to good while still allowing some providers to be re-inspected earlier if they are ready for it. A provider that has been judged as requires improvement would continue to receive a monitoring visit between inspections.

### **Inspection of colleges at campus level**

Ofsted has, for some time, intended to introduce grading and reporting on individual colleges within college groups as part of the overall inspection of the college group, subject to receiving the funding to be able to do this.

Since the disaggregated data that will make it possible to determine what provision is delivered by which college will not be fully available until 2021, it will not be possible to introduce that for the beginning of this framework. We will therefore consult further on this in due course. We will, in the meantime, look at ways in which we can better differentiate the relative performance of individual colleges within inspection reports of college groups.