

Quality Assurance System framework document

Response of the Association of School and College Leaders

- 1 The Association of School and College Leaders (ASCL) represents 14,000 members of the leadership teams of maintained and independent schools and colleges throughout the UK. This places the association in a unique position to see this initiative from the viewpoint of the leaders of both secondary schools and colleges.
- 2 ASCL welcomes the opportunity to further this work, and the document is greatly improved over previous versions.
- 3 However, the association has a number of reservations both about the presentation and the proposed system itself.

General points

- 4 Overall the proposed system is cumbersome and overly complex. It should be a fundamental principle that different types of provider should be treated in an equitable way. This does not seem to have been achieved. For example, how Ofsted inspections fit into the system would appear to differ depending on the type of institution. Exactly what responsibilities are held by which institutions remains insufficiently clear at many points in the document. In general there is insufficient emphasis on the concepts of self-evaluation, self-improvement and peer-to-peer comparison and support.
- 5 The language and terminology needs tightening up. For example, in the aims of the QAS in paragraph two it talks about having the right information about FE colleges and training organisations but makes no mention of schools, sixth form colleges or specialist providers. In the second bullet point it states "... the learning that they have chosen will be delivered ...", when surely it is the "learning programme that they have chosen"? Similarly in the aims there is no mention of issues such as the link with the institution's self evaluation and ensuring that certain standards are achieved. These points are covered later in the document but they should appear in the aims of the system.
- 6 The writing style varies throughout the document, including changing from second to third person; greater consistency is needed.
- 7 The document is caught between describing the system "in transition" and as it will be and I would assume should be written for post-April 2010 as that is when it will be operational.

Chapter 1

- 8 Paragraph 1: Surely it is to meet “at least the minimum standards”?
- 9 Paragraph 3: It is unclear what the LA being responsible actually means.
- 10 Paragraph 5: In many institutions 19 year olds and 16-18 year old may well be in the same provision. How the quality of this provision is to be assured between the SFA and the LAs needs clarifying.
- 11 Paragraph 7: More clarity is required in the distinction between ‘lead organisation’ and ‘lead commissioner’. See also paragraph 21, where ‘home LA’ appears to be synonymous with ‘lead commissioner’. Or do the square brackets mean ‘either/or’? Either way, this is not clear.
- 12 Paragraph 8: There is no mention of the LAT which is the primary data source for institutions and Ofsted.
- 13 Paragraph 13: There is huge assumption here that the SIP will have both the skill set and the time to take on this role. They already have a very full brief and only five days of allocated time.
- 14 Paragraph 15: It is difficult to write with any certainty about two systems that are both in their pilot phase in schools. It is dangerous to make about how these will operate until the pilot phase is completed.
- 15 Paragraphs 17 and 20: There appears to be a contradiction in that LAs are responsible for the quality of provision for young people who reside within the authority but as far as academies and FE colleges are concerned have no responsibility for the quality assurance of some of their providers.
- 16 Paragraph 25: There is room for doubt here about the ability of all LAs to remain unbiased in evaluating the quality of their own provision. A simple reciprocal system administered through a central register (perhaps administered by LGA) could be used?

Chapter 2

- 17 Throughout this section there are references to more than one body having responsibility for some area. This is not satisfactory as it must be clear which body has the ultimate responsibility; for example paragraph 38’s ‘Central Government, together with the SFA and YPLA ...’ raises the question as to which body is actually responsible.
- 18 There are also duplications here with what is written in the NCF which may not be needed in the QAS document.
- 19 Paragraph 65 mentions that the LSC administers surveys. It will not exist after 1 April. This needs amendment or deletion.
- 20 Paragraph 67: ASCL is concerned about the implication here that a decision has been made to introduce a post-16 ‘balanced scorecard’ and ‘labelling’ through FfE scores without these notions being fully discussed or properly consulted on.
- 21 Paragraph 74: It is important that this guide does not become a prescription.

- 22 Paragraph 75 does not make clear why the 16-19 SARs are to be used by the SFA. The SFA will not have the 16-19 expertise to be able to comment on them. Putting this as a requirement creates an unfortunate concatenation of LSIS's support role with the monitoring, inspection and enforcement roles of Ofsted. This system will not be welcomed by FE colleges, for whom it will appear messy and possibly oppressive.
- 23 Paragraph 85: Replace 'sometimes' with 'may be' in definition.
- 24 Paragraph 95: Deadlines for the agreement and production of the case conference protocol should be set out, or they will be under way before the system has been decided.
- 25 Paragraph 106: It seems rather weak to have just SIP support for SSFs when the whole edifice of LSIS is there for colleges. Should schools not also have access to LSIS?

Glossary

- 26 FfE: does not include SFCs in definition yet mentions FE colleges and Independent Learning Providers specifically. Needs to be consistent.

I hope that this is of value to your consultation, ASCL is willing to be further consulted and to assist in any way that it can.

Malcolm Trobe
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