#### **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.

# 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
	$\boxtimes$				

#### Comments:

The Greater London Authority (GLA) and the Mayor's Office for Policing and Crime (MOPAC) welcomes the focus on the curriculum and the substance of education.

There is a growing recognition that interdisciplinary skills are essential to ensuring young people are equipped to tackle real world problems and develop creative solutions. Ensuring young people gain qualifications and skills across a breadth of subjects, including arts subjects is essential.

You must consider the positive impact of engaging with arts in school as well as the needs of the future creative economy. Large-scale studies demonstrate that learning through arts and culture improves attainment in all subjects, with music boosting academic performance and theatre education improving reading and writing. The creative sector in London accounts for one in six jobs in the capital, with jobs in the creative sector growing four times faster than in the economy as a whole. We are particularly concerned by the 35 per cent drop in the take-up of arts subject since 2010.

We need Ofsted inspectors to be rigorous and consistent in their interpretation and assessment of a broad and balanced curriculum.

We have given examples in our response to your consultation of the work that City Hall is doing to support schools and colleges to develop their curriculum and support all their learners. We hope that by accessing our programmes or using the tools and resources that we have developed teachers can see an impact on their workload.

The Mayor's London Curriculum offers free teaching resources at key stage 2 and 3 that help London teachers and schools to bring the national curriculum to life by making inspiring connections with the city around them. The programme links schools with the many learning

opportunities provided by London's museums, galleries, performing arts venues and scientific centres. We value Ofsted having asked us to partner with them at their 'Curriculum Commentary Events' for London teachers that we hosted at City Hall. Nearly 200 middle leaders attended the workshops led by Her Majesty's Inspectors to give teachers a deeper understanding of what goes into developing a rich curriculum, alongside showing exemplar resources of the London Curriculum which also can reduce teacher workload. The London Curriculum is most used by schools in deprived London boroughs, where children are less likely to have access to the city's opportunities in their day-to-day lives.

Ahead of a national rollout in 2020, the GLA is funding a new Gender Action award in London's schools. Developed by the Institute of Physics, Kings College London, UCL Institute of Education and University Council of Modern Languages, it provides support for teachers to take a whole-school approach to tackling stereotypes and gain recognition for their school www.genderaction.co.uk

We can also share considerable learning from our support of our 17 subject knowledge hubs in the capital which gave teachers from a range of schools the opportunity to work together with subject and business experts. Online resources are at: <a href="https://www.london.gov.uk/hubs">www.london.gov.uk/hubs</a>. These hubs worked with 900 schools and supported 1,600 teachers.

The links between pupil health and wellbeing and attainment are increasingly recognised and backed up by robust evidence. Childhood obesity is a critical issue especially for London's children. Prevention begins in childhood where it is proven that schools have a fundamental influence. A recent report from Public Health England showed that that pupils with better health and wellbeing are likely to achieve better academically; effective social and emotional competencies are associated with greater health and wellbeing, and better achievement; and that a positive association exists between academic attainment and the physical activity levels of pupils.

In response the Mayor is taking action through Healthy Schools London which rewards schools that create environments conducive to the health and wellbeing of pupils. The Mayor's London Food Strategy highlights the important role schools play in providing a healthy whole-school food environment.

Ofsted can play an important role in a multi-agency approach to tackling child obesity and improving children's health outcomes; while also improving attainment. We would therefore welcome greater mention of health within the Inspection Framework; specifically, in sections 25 (implementation) and 28 (leadership and management).

Taking action to reduce youth violence is also a significant area of focus for us. We want all our children and young people to reach their potential and to be safe. In his recent letter to the Prime Minister the Mayor was clear that the factors that are causing a rise in violence are extremely complex and involve the deep-seated problems of poverty, inequality, social alienation, cuts to police, local authority and school funding, and a lack of opportunities for young people. We are making the case to government that schools need to be properly resourced to be able to carry out effective early intervention work for those at risk of exclusion. We want to ensure schools are supported in their local area and are aware of the range of support that they can access.

Ofsted should recognise and share the best practice from schools which are demonstrating inclusive practices and reducing exclusions.

We welcome Ofsted's input into the development of the Mayor's new Violence Reduction Unit and your support in working with us to further develop the public health approach to tackling violence in the capital. Schools are integral to this work.

Following the Mayor's meeting with HMI Chief Inspector of Schools in September we are pleased to hear that the continuous conversations about sharing school-level data between our officials are helping school inspectors to understand the level of violence in a community when inspecting a school.

We have provided more detail in the final 'additional comments' section of our consultation response. As previously discussed data sharing is a challenge and as such we welcome your recommendation that data on managed moves is made public. We want Ofsted to consider taking this a step further in London by undertaking a deep dive into managed moves so we can better understand the impact on the capital's children. We will encourage schools and others to call out off-rolling but we need Ofsted to take action if off-rolling is found and commit to re-inspecting those schools. Identification of off-rolling must influence inspection outcomes.

#### **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.

# 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	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
	$\boxtimes$				

#### Comments:

We understand that Ofsted has also responded to parental demand to give better information about how well behaviour is managed in a school. A new separate behaviour judgement will help parents to assess whether schools are creating a calm, well-managed environment free from bullying. Alongside that, proposals for a 'personal development judgement' will recognise the valuable work of schools and colleges in building young people's resilience and confidence in later life – through extra-curriculum work such as sports, drama or debating teams. The Mayor recognises the vital role that schools, colleges and youth providers play in supporting young people's personal development. His £45million Young Londoners Fund is helping children and young people to develop personal and social skills, make positive choices and fulfil their potential by supporting a range of education, sport, cultural and other activities across the capital.

By equipping young people with knowledge of London, as well as their local communities, and democracy at all levels and educating them about democratic values, skills and participation, the London Curriculum is supporting young people to take responsibility for their role in the city. A new key stage 3 London Curriculum Citizenship resource explores what citizenship means for children and young people growing up in London today and how children and young people can shape the London of tomorrow.

Ofsted may want to focus on key points in young people's transition between stages of education. Our Stepping Stones programme is a school-based, targeted intervention aimed at vulnerable pupils who are considered at risk during the transition from primary to secondary school. 15 London secondary schools are running the Stepping Stones programme. Evaluation of the pilot year showed that taking part had a positive impact on students' attainment, behaviour and attendance. As well as Year 7 pupils being mentored by year 10 pupils, a key part of the programme is Stepping Stones lessons. Five units have been developed which include lesson plans and resources together with tools and strategies to help students manage their behaviour and emotions. We have found that teachers like the units so much that they are delivering the lessons to the whole of year 7 as part of the PSHE curriculum rather than just for their Stepping Stones pupils. This has allowed schools to establish norms of positive behaviour among the entire year group from the outset. The Stepping Stones toolkit is available for everyone to download for free at: www.london.gov.uk/stepping-stones

Our recent research 'Boys on Track: Improving support for Black Caribbean and Free School Meals Eligible White Boys in London' identified seven areas for action to improve the educational attainment for two of London's largest underperforming groups. Alongside the need to involve parents and families with their children's education, the research highlighted the need to inspire young people and enhance access to work experience opportunities, careers guidance, and support into employment.

The new Ofsted inspection framework and guidance should acknowledge that extended schooling initiatives and wrap-around support for disadvantaged families can have significant long-term benefits, and activities of this nature should be valued and recognised during inspections. We know that poverty impacts on a child's learning. The GLA is working with primary schools in London to understand what role they can play in combatting the symptoms and some of the underlying causes of child poverty. This includes co-designing new initiatives with families and teachers that focus on providing wrap-around support to low-income families, as well as exploring how existing extended school programmes could be made more inclusive. The high-stakes pressure felt by schools to focus on performance data and attainment in the short-term can disincentivise schools to invest in such interventions.

We support the proposals being set within a contextual safeguarding approach to understanding, and responding to, young people's experiences of significant harm beyond their families. Contextual Safeguarding recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. We are keen that this forms part of the inspection framework and promotes resilience to violence

All young people should learn at school about healthy relationships of all kinds, and that includes LGBT+ relationships. Providing this will help every single young person to feel accepted, understood and included. It empowers them to make safe and informed decisions,

<sup>&</sup>lt;sup>1</sup> Boys on Track, LKMCo, December 2018 https://www.london.gov.uk/sites/default/files/lkmco\_boys\_on\_track\_report.pdf

confirming that LGBT+ relationships are part of everyday life, and ensures that all Londoners
can feel proud of who they are.

#### **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.

#### 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		$\boxtimes$				
Childcare on non- domestic premises		$\boxtimes$				
Childcare on domestic premises		$\boxtimes$				
Childcare settings that offer care exclusively before and after school		$\boxtimes$				

#### Comments:

We welcome the focus on the quality of early years education.

Early years practitioners often lack the knowledge and confidence to identify special educational needs. Consultation at our Early Years Conference in March 2019 recognised that greater investment in early years staff and teachers, for example, through specialised training and increased focus on child development, will help support early identification of children with SEND.

The Mayor's Early Years Hubs are already working on improving access to quality early education and childcare, focusing on those from less advantaged backgrounds and those with additional needs. The hubs provide an opportunity for schools, childminders, Private Voluntary and Independent (PVI) nurseries and schools to work together over a three-year period. The Wandle Hub, which works across Wandsworth and Merton, has developed accredited SENCO training at level 3. This gives early years staff the skills and confidence to early identify children with SEND and helps provide them with the support they need.

We have identified take-up of the 2-year-old free early years entitlement in London as key to supporting the city's most vulnerable children. Improving take-up is a core objective of the Early Years Hubs. Already, over 1,000 eligible 2-year-olds have benefitted from the free early education offer through the hubs.

We know that parents across the capital need help to understand what the Government's free childcare offer is and how they can access it. That's why we are funding 11 organisations to pilot local creative activities to engage 4,000 parents, raise their awareness of the benefits of

early education and connect with local childcare providers. The Mayor launched a pan-London early years education marketing and social media campaign in March. This reaches out to parents through Instagram and Facebook and highlights the 15-hours of free early education for 2-year-olds offer.

Early years staff often lack confidence in how to identify additional needs and can also benefit from more support to increase their overall management and leadership skills. The Mayor's Early Years Leaders Programme, which is based on a coaching model, will train 30 coaches to support and develop skills of 90 practitioners across London.

A planned joint event at City Hall for SEND school and borough leads and other experts with the Whole School SEND Consortium will discuss SEND related changes in the draft Ofsted framework, alongside priorities around behaviour and speech and language communication, identification of need and SEND leadership.

Ensuring children have the best health possible in the early years of life has an impact on children's future school readiness, their achievement at school and future life chances. The Mayor's Healthy Early Years London Award scheme complements and enhances the statutory Early Years Foundation Stage framework, adding to the focus on children, families and staff health and wellbeing. We need Ofsted to ensure that every early years setting is responsible for healthy provision and promoting positive messages to support families with healthy lifestyles.

We would like newly registered settings to be inspected sooner than they are under current legislation. Currently, if you are on the Early Years Register, you will usually be inspected within the first 30 months of registration and then at least once in every inspection cycle. This can potentially put vulnerable children at risk, particularly given that newly registered providers can offer places to 2-year-olds eligible for free early education and childcare.

#### There was no GLA input to proposals 4 - 8.

#### **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:

Proposed education inspection framework types of provision	Current types of provision		
Education programmes for young people	<ul> <li>16–19 study programmes, including:         <ul> <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> </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.

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
	$\boxtimes$				

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

The GLA assumes responsibility for funding adult learning programmes for Londoners in August 2019 and welcomes the opportunity to collaborate with Ofsted to ensure that providers are reviewed for quality in line with national and devolved funding priorities, where appropriate.

The GLA appreciates the aim of combining the inspection into coherent and inclusive reports, however, there is a concern that the reduction will mean that specialist knowledge will be lost, especially when inspecting high needs and/or SEND provision. It is of paramount concern that the most vulnerable learners are provided for within the framework.

The GLA is committed to ensuring high quality apprenticeships are delivered across all levels in London. Clear guidance should be issued on how quality will be measured at different apprenticeship levels following the reduction of Ofsted's responsibility for the quality of provision (now levels 2 to 5) and the Quality Assurance Agency's responsibility for levels 6 and above. This is particularly the case for providers offering apprenticeships across grade 2 to 5 and 6 and above, to ensure coherent, high quality provision, without additional burden for the provider.

The GLA welcomes the opportunity to be part of a consultation regarding the inspection of T-levels

#### **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.

### 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
	$\boxtimes$				
Comments:		•			

The GLA supports the methodology for the proposed model for short inspections.

The GLA believes that it is important to explore a data sharing agreement with Ofsted to enable information sharing on GLA-funded providers as part of Ofsted's risk assessment of providers in determining the inspection schedule.

#### **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 reinspected 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.

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		
	$\boxtimes$						
Comments:  The GLA broadly supports the proposed changes to the inspection timeframe, increasing to 12 to 30 months, on the basis that the provider under scrutiny will have an extended period to rectify any issues of underperformance.							
However, it will be of key importance to ensure that the provider is adequately monitored over the timescale between full inspections to ensure that performance does recover and does not decline further.							

#### Please use this box to record any additional comments:

Like Ofsted, we want the capital to have an inclusive education system that can accommodate and cater for the needs of all learners of all ages. We have seen the impact that this approach has had in Glasgow where they have reduced the number of exclusions by 81% over the last 10 years and had just one child permanently excluded last year.

We have provided additional information and feedback on the three objectives you list on page 10 of this document.

#### • 'Early years provision is inclusive of young children with specific needs'

The Mayor's three Early Years Hubs bring together early years providers to improve access to quality early education for London's most disadvantaged children. Already, they have supported over 70 early years providers in Barnet, Newham, Wandsworth and Merton (Wandle). New accredited special educational needs and disability (SEND) training developed by the Wandle Early Years Hub gives early years staff the skills and confidence to early identify children with SEND and helps provide them with the support they need.

We are just starting to deliver our 2-year Early Years Leaders Programme which will train 30 coaches and improve the leadership and management skills of 90 practitioners across London. Based on a coaching model it will respond to the CPD needs of the sector; one of the priority areas is to increase confidence in identifying and supporting children with SEND.

At our Early Years Conference in March we bought together over 100 sector experts to discuss how children with SEND can be better supported in the early years. Attendees raised the challenge of early identification, staff skills and confidence, parental engagement and understanding of the support their child can access, issues about the process to obtain an education and health care plan, and some settings not accepting children who have SEND. There was frustration at the fragmentation of the system and the difficulty that both practitioners and parents had in navigating the pathway to get support.

We need Ofsted to challenge settings that do not have adequate support for children with SEND. We would like you to highlight best practice where settings are helping parents navigate the system to find holistic support for their children. We'll be doing more work on SEND and early years in London and we would welcome further discussion with Ofsted.

# • 'Schools do not remove, or lose pupils from their roll for reasons other than those in the best education of those pupils'

The Mayor values the pan-London collaboration of agencies including Ofsted through the work of his new Violence Reduction Unit (VRU). Ofsted very helpfully contributed to discussions at the last meeting of the VRU's Partnership Reference Group on school exclusions and the opportunities for intervention. The VRU recognises the role of the wider community in helping more young people stay in school. We welcomed the thematic review that Ofsted recently published on 'Safeguarding children and young people in education from knife crime - Lessons from London' and we look forward to working closely with you to progress the recommendations.

We welcome the intention of Ofsted to actively discourage negative practices such as off-rolling. Analysis shows that those excluded or missing from education, are at greater risk of being victims and offenders in relation to serious violence affecting young people.

There were various investigations relevant to exclusions throughout 2018. A recurring theme is the variance in policy by school for the type of pupil behaviour which leads to exclusions. We welcome the recommendation in Ofsted's knife crime review that local authorities should have a strategic response to permanent exclusions, and that they should also, in conjunction with regional schools commissioners, challenge schools and multi-academy trusts when exclusions do not appear to be in line with statutory guidance.

In the Mayor's response to the Timpson Review the Mayor identified the following issues:

- a) In London, excluded pupils are moving between boroughs and also out of London. This means that responsibility for pupils and arrangements for communicating between statutory organisations is not always clear;
- b) Many pupils who have been excluded have SEN and mental health needs. More needs to be done to assess and put in place support before pupils are excluded, and at the early years and the primary phase;
- c) It is crucial that the inter-relationship between and the information about SEN, mental health needs, looked after children, and the safeguarding issues are understood in-the-round.

The lack of public information on managed moves is extremely concerning. We agree with your recommendation that the Department for Education should collect data from schools about managed moves in the same way in which it collects information on permanent and fixed-term exclusions. Your 2017/18 annual report noted that London had more movement of pupils compared with other areas of the country. We want to understand more about this but there is little transparent data on why children are leaving school rolls. Even if DfE make data on managed moves public there will still be more work needed to understand pupil trajectories and the positive or negative impact that this approach has. We want Ofsted to commit to sharing any analysis they have so far and to consider conducting a London thematic report that conducts a deep-dive on the impact of managed moves.

It is positive that Ofsted have led the way on identifying the issue of off-rolling. We need Ofsted to provide more information on the criteria that they will use to call out instances of off-rolling. We also want to understand how Ofsted will liaise with and support local authorities and Regional Schools Commissioners who raise off-rolling concerns. We want assurance that Ofsted will take action if off-rolling is found outside of the normal inspection cycle, and that this will trigger a re-inspection of the school. Identification of off-rolling must influence inspection outcomes.

'Further education providers are supporting learners to complete programmes of study that are appropriate and help them reach meaningful destinations'

A child needs excellent careers information, advice and guidance throughout their education. We know that children's career aspirations are shaped at an early age, with aspirations only changing marginally between the age of 7 and 17.<sup>[1]</sup> It is important therefore to engage children at a young age to raise aspirations, and challenge gender, class and other types of careers stereotyping.

<sup>[1]</sup> Chambers et al (2018) Drawing the future: Exploring the career aspirations of primary school children from around the world. Education & Employers.

We encourage Ofsted to share information on the new Gender Action award, which the GLA is funding in London prior funding to a national roll out in 2020. Developed by the Institute of Physics and partners it provides support for teachers to take a whole-school approach to tackling stereotypes and gain recognition for their school.

The Mayor is funding and further developing initiatives designed to support teachers and parents of primary school-aged children to engage with the world of work and their future careers. This will include new careers-focussed Family Explorer Trails and continuing to develop the careers elements of the London Curriculum. We are enhancing support for schools and pupil groups with the highest levels of need through investing £4m of ESF funds to support more Careers Clusters, which bring groups of schools and colleges together with businesses to develop employer focused activities. In addition to this, City Hall is tripling the size of the London Enterprise Adviser Network so that strategic advice and support from a senior business volunteer is available to all state secondary schools and colleges in the London LEP area.

Evidence shows the impact that inspirational careers education can have, especially on the most disadvantaged groups. We need the inspection framework to better reflect the importance of schools giving due time, attention and resources to provision of careers support to pupils.

London's schools have seen a transformation over the past 15 years and GCSE results in London are now the best in the country. However, the capital fails to sustain this progress in post-16 education. City Hall and London Councils have jointly commissioned a review looking at the education trajectories for 16-18-year olds in London in order to better understand the capital's challenges and to identify potential solutions to delivering what London needs. This work will report shortly – but has been hampered by serious delays in accessing data from the National Pupil Database (up to 10 months between requesting and receiving data). It is vital that data access issues are resolved so that City Hall and other stakeholders are able to take an evidence-based approach to developing a more coherent and integrated education and skills system in London.