Framework for Excellence: Responses to Consultation

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This document is of interest to everyone in the learning and skills sector.
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Framework for Excellence: Responses to Consultation

Introduction

This report summarises the responses received during the consultation by the Learning and Skills Council (LSC) on the Framework for Excellence (the Framework). It does not attempt to provide an exhaustive guide to the consultation responses, but to highlight the main points raised. The LSC is considering these responses and, in February 2007, will publish further proposals, taking into account the views expressed.

Background

The consultation paper Framework for Excellence: A comprehensive performance assessment framework for the further education system (LSC, 2006) was the first in a series of publications that will describe proposals to introduce a new framework for the post-16 learning and skills sector. It presented for consultation proposals relating to the underlying principles of the Framework and the way it will be used by colleges, providers, the LSC, employers, learners and all other stakeholders.

Consultation process

The consultation paper invited responses to 15 questions. Respondents were also invited to comment on any other aspects of the proposals. Responses were invited by post, fax or email.

The consultation period was 13 weeks from the launch of the document on 24 July 2006 to a deadline for responses of 20 October 2006.

This report presents a summary and analysis of the responses using a series of figures and a commentary on each question. Figures are broken down into two major categories: further education (FE) colleges and sixth-form colleges.

Responses

The LSC received 218 written responses to the consultation on the Framework. Table 1 presents a breakdown of these.

Table 1: Responses to consultation.

<table>
<thead>
<tr>
<th>Respondent type</th>
<th>Number of responses</th>
</tr>
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<tbody>
<tr>
<td>FE college</td>
<td>98</td>
</tr>
<tr>
<td>Sixth-form college</td>
<td>33</td>
</tr>
<tr>
<td>HE institution with FE provision</td>
<td>3</td>
</tr>
<tr>
<td>Private training provider</td>
<td>11</td>
</tr>
<tr>
<td>Local authority</td>
<td>14</td>
</tr>
<tr>
<td>Other public sector institution</td>
<td>7</td>
</tr>
<tr>
<td>Employer</td>
<td>5</td>
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<td>Voluntary sector institution (including representative bodies)</td>
<td>8</td>
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<td>5</td>
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<tr>
<td>Specialist designated institution</td>
<td>2</td>
</tr>
<tr>
<td>School</td>
<td>1</td>
</tr>
<tr>
<td>Other</td>
<td>31</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>218</strong></td>
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Headline Messages

8 The key themes that emerge from the responses are:

- good support for the principles of the Framework
- uncertainty that the Framework can be implemented effectively
- acceptance of the principle of application to all types of provider, but doubt about how this could be achieved
- serious concerns that the Framework would increase rather than reduce bureaucracy
- strong views that school sixth forms should be included in the Framework
- a strong preference for the use of the Common Inspection Framework four-point scale or at least only one scale
- views that the weighting of key performance indicators should be differential, with a strong preference for weighting more heavily elements relating to quality and learner success
- widespread belief that qualitative as well as quantitative judgements should inform overall performance assessments, but appreciation that this would be difficult to achieve
- support for overall performance captured in a statement and certainly not by a star rating, which is seen as too simplistic
- timescale for implementation held to be unrealistic, with a view that this should be delayed until 2008 or 2009.

9 Overall, the comments were broadly supportive of the principles but serious doubts were expressed about how implementation could be achieved within a short timescale.

Analysis of Responses

10 Representative bodies such as the Association of Colleges are often referred to in the summary report as they represent a number of colleges. The analysis of the responses is broken down under FE colleges and sixth-form colleges due to the relative percentage of responses received from these two groups.

Question 1

Do you think that a comprehensive performance assessment should incorporate the Common Inspection Framework?

<table>
<thead>
<tr>
<th></th>
<th>All responses</th>
<th>FEC</th>
<th>SFC</th>
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<tbody>
<tr>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No opinion</td>
<td></td>
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11 Over 80 per cent of respondents agreed that the comprehensive performance assessment should incorporate the Common Inspection Framework (CIF), though this was lower for sixth-form colleges at just over 70 per cent.

12 This message was reinforced by individual comments. Many respondents felt that not only should the CIF be incorporated, but also that it would be best used as the sole measure, with some adaptation when the CIF is reviewed in 2009. The main arguments advanced for this were the widespread recognition of the CIF as the key basis for measuring performance and its independent accountability. East Berkshire College stated that: ‘A comprehensive performance assessment should include the Common Inspection Framework because the external judgements of the Ofsted inspectors do have much credibility and the inclusion of a professional judgement about the quality of provision throughout the institution is essential’.
13 It was striking that this view was held not only by the inspectorates but also by the great majority of providers of all kinds and representative bodies such as the Association of Colleges (Aoc), the Catholic Education Service, the TUC and NUS and so on.

14 Within this strong overall view, there were some variations of emphasis, for example, the extent to which the CIF could be the major as distinct from the sole element in the Framework for Excellence. Concerns were also expressed about the danger of bureaucracy and of confusion arising from the use of two different measures of quality. Juniper Training Ltd noted that: ‘The current inspection regime involves reporting at least 10 grades and 6 judgements. The proposed Framework involves deriving 11 more grades, all in different ways and often weighted’.

15 The few who did not believe that the performance assessment should incorporate the CIF were not so much against it in itself but wanted one overall framework that differed from both the proposed Framework for Excellence and the CIF. This included the merger of comprehensive performance assessment and inspection into one assessment or using an alternative framework such as the Business Excellence Model.

**Question 2**

Do you agree that the three dimensions of responsiveness, effectiveness and finance based on the seven key performance indicators (KPIs) are sufficient for comprehensive performance assessment or are there other aspects that need to be included?

16 The answers to question 2 were significantly less positive than for question 1. Overall, about 60 per cent thought that the three dimensions would be sufficient but for sixth-form colleges this fell to 40 per cent.

17 As important was the wide range of views expressing serious doubts about aspects of responsiveness and finance in particular. There were very few comments on effectiveness. Additionally, there were concerns about weighting between these dimensions.

18 Serious concerns were widely expressed about the financial dimension. While respondents accepted the need for financial accountability, the place of financial judgements in overall assessments elicited much criticism. Many felt that value for money would be a better measure than the financial categories proposed. Concern was expressed about the impact on financial health scores and overall performance assessment for institutions that implemented heavy capital investment to improve facilities with consequently raised borrowing requirements. It was also felt that undue emphasis on finance as an indicator could lead to the avoidance of risk-taking, which might be needed to improve responsiveness. Several respondents believed that financial issues were better encompassed in a broader view of leadership and management.

19 Responsiveness also elicited a wide variety of views. Very many stressed that it should encompass responsiveness to the needs of local communities. Typical of this was the view of the National Institute of Adult Continuing Education (NIACE): ‘A truly responsive provider is one that reflects the context and community in which it is situated’. Responsiveness also needed to be more explicit about equal opportunities and inclusiveness; the National Association of Specialist Colleges (NATSPEC) noted the paramount importance of the health and safety of learners, relevant to Every Child Matters.

20 The concept of employer responsiveness also came under scrutiny. Sixth-form colleges and the Sixth Form Colleges’ Forum (SFCF) made the point that, with a very high proportion of their students proceeding to higher education, this needed to be handled with particular care. The diversity of the sector might make such a measure difficult to apply across the board. It was also suggested that ‘engagement’ might be a better term to use than ‘responsiveness’.
21 Of particular interest were suggestions of major elements that respondents felt had been omitted or underplayed. Many references were made to the need to take account of an institution’s capacity to innovate and improve key elements as a better measure. HOLEX commented: ‘There should be a capacity to improve based on improvements already made, evidenced by qualitative and quantitative data and development plan[s] in place’. Stratford-upon-Avon College commented: ‘It is important that colleges plan ahead and make provision for change – not enough to simply measure current performance’.

22 Finally, there was a wide range of views that the complexity of the issues making up these dimensions militated against aggregation and overall judgements. As one college commented: ‘There is also a dangerous assumption that all measures are capable of being reduced to a single performance indicator. The sector and learners are much more complex than this’. Comments included the view that learners were most interested in the performance of the programme or curriculum area in which they wished to study and that aggregation dilutes their opportunity to focus on this.

Question 3

Do you agree that the proposed framework of KPIs is applicable to all the types of colleges and providers that make up the further education system?

23 The overall response to this question was barely positive. About 50 per cent of respondents agreed with the question. About 60 per cent of FE colleges agreed but only 20 per cent of sixth-form colleges did so.

24 The more detailed comments paint a picture of significant doubt about how the Framework and KPIs could be applied. The dominant feature in the replies to this question was exasperation with the exclusion of school sixth forms from the Framework. Over 50 replies to question 3 alone made explicit reference to this. The key arguments were comparability and fair treatment across all post-16 provision and the important implications for the development of 14–19 diplomas and collaborative arrangements between schools and colleges. Several saw the exclusion of school sixth forms as giving the latter an unfair advantage because they would have less demanding criteria. A sixth-form college noted: ‘It is unacceptable that it could be described as a comprehensive basis for performance assessment without the involvement of schools’. The annual publication of ratings required that the results for schools be compared with those of other providers.

25 Many agreed with the principle of general application to all types of provider. It was acknowledged that there would be difficulties, but these should be overcome in the interest of standardisation. A training provider noted that: ‘To do otherwise would be unjust’. Transparency also required application to all providers. A number of replies agreed ‘in principle’ but then qualified this with reservations of various kinds.

26 Many replies overlapped with those to question 2, particularly in relation to the definition of employer responsiveness. The overall tenor can be summed up in one word, flexibility. The view of Peter Symonds College was that: ‘The individual mission of institutions must be recognised. The Framework cannot be applied in the same way to each institution or provider.’

27 It was also strongly argued that weighting would have to be flexible to take account of the diversity of the sector. A college of further and higher education commented that: ‘This is a very diverse sector and different providers will be aiming to achieve very different things. It may therefore be difficult to apply the KPIs consistently across all providers.’ More radical views argued, for example, that it was a ‘central flaw’ that meaningful comparisons could be made based on data for very different types of provision. There was a measure of agreement with the principle posed by question 3, but implementation was seen as likely to be very difficult.
Question 4

Do you agree that the information needed for the proposed Framework should be assembled as far as possible from the information any well-managed college or provider would collect and analyse?

Although rather fewer responded to question 4, the majority agreed that existing data should be used. Over 80 per cent of all responses, about 90 per cent of responses from FE colleges and over 70 per cent from sixth-form colleges, took this view.

Beyond this, a strong vein of scepticism ran through the replies that implementation of the Framework would reduce bureaucracy overall. In particular, the statement in paragraph 12 of the Framework that ‘the LSC may need to collect more data’ and the reference in paragraph 26 to ‘a range of more detailed criteria indicators and measures’ raised unease with a number of respondents, including Ofsted.

Beyond the general concern that bureaucracy should be reduced, other themes came through. These included clarity of processes, transparency and the development of a set of consistent standards. It was felt that consistent standards had not yet been fully developed.

Concern was also expressed about the possible burden of meeting the requirements of the new Framework and that this might divert resources from the frontline. The Local Education Authorities Forum for the Education of Adults (LEAFEA) pointed out that: ‘There have been many promises that bureaucracy will be reduced but very little evidence of achievement’. Small providers in particular would find it hard to meet requirements and would need some support. The Adult Learning Inspectorate (ALI) asked whether the burden on small providers would be greater than the benefits brought by the outcomes.

This linked to a view that ‘one size fits all’ would not work. The LSC might be better advised to trust the judgement of other bodies measuring a provider and then assemble judgements from these. The key was seen to be the capacity of the LSC and Ofsted to share judgements. The LSC would need to test the implications of this question to ensure that it would achieve the desired aim. Some reference was also made to other systems being developed, such as the Disability Equality Scheme. Others commented that it was not wholly clear that the information a college collects in the normal course of its activities would necessarily tally with the LSC’s requirements.

Question 5

Do you agree that the principles proposed in Section 4 provide a suitable basis for the development of the KPIs?

Over 70 per cent of all respondents agreed with question 5, which included about 70 per cent of FE colleges and a little over 50 per cent of sixth-form colleges respectively.

Any doubts expressed related to the details of how the principles would be implemented, although there were also suggestions for other principles that might be included. These included a sustainability indicator, value for money, an
indicator to reflect a provider’s location on a journey rather than an absolute measure, and a measure of how performance meets the needs of learners now and in the future.

35 Most comments referred to the application of key principles and how they would be worked out in detail. The view of the National Association for Managers of Student Services (NAMSS) was that: ‘The proof of the pudding will be in the eating and we wait to see how the KPIs emerge from these principles.’ There was welcome and demand for more active consultation in development.

36 The key message was the need for flexibility in interpretation and development and the way in which the principles could be applied across a sector with a wide and diverse range of providers. In relation to personal and community development learning (PCDL), it was noted that there could be difficulties in meeting the volume measures of learner numbers. The importance of recognising and recording progress and achievement (RARPA) in addressing individual needs was stressed, but it was also asked how these could be reconciled with business needs since it could not be viewed as a ‘statistically robust’ measure.

37 Some who agreed with the principles believed that they were not well-reflected in the proposals. Responsiveness, for example to the needs of the community, was again raised as an issue. There was agreement on the need to avoid perverse incentives but from some at least there was a suspicion that this could happen, particularly if the proposals increased bureaucracy.

38 The need to improve destination data, which at present is seen to be incomplete, was emphasised. It was recognised that there would be costs in doing this well.

39 There was also a general concern that both the principles and the application were not adequately taking account of learners with learning difficulties and/or disabilities and how they were supported. It was suggested that the LSC undertake a disability impact assessment.

**Question 6**

Do you think that the proposed factors contributing to the KPIs described in paragraphs 31 to 37 are a suitable basis for initial development and trials?

40 Around 60 per cent of all respondents agreed with this question but this fell to under 40 per cent for sixth-form colleges.

41 Many issues had already been covered in response to previous questions, in particular the need for more detailed development. The importance of trialling before implementation and the need to develop learner and employer responsiveness more thoroughly before the KPIs were used were emphasised.

42 Further doubts were expressed about the financial measure under question 6. Some respondents felt that the role of small- and medium-sized enterprises (SMEs) was undervalued and that there needed to be more consultation with them. Cirencester College’s view was that: ‘[SMEs] also fall below the radar of the LSC and thus only appear in local LSC priorities by accident’. If the LSC wants the views of employers, it must get views direct from them.

43 The Workers’ Educational Association (WEA) noted that learner responsiveness needed to be measured by more than satisfaction surveys, arguing that: ‘[Surveys] don’t recognise specialist provision, or assume that all learners in FE are on site or 16–19 years old.’ Ofsted pointed out that colleges varied in carrying out a searching analysis of learners’ views. In measuring performance against plan, it was stressed that activity related to LSC...
requirements was only part of a wider picture, and that to encompass all activity would increase the resource burdens significantly.

**Question 7**

Do you think that there are any additional or alternative objective, quantifiable indicators that should be used to define the KPIs, particularly where they draw on existing data sources?

44 The overall response to this question indicated that about 40 per cent of all respondents and a similar percentage of FE colleges believed there should be no additional or alternative factors to define the KPIs. A smaller percentage (25 per cent) of sixth-form colleges agreed.

45 The main suggestions for additional indicators were firstly kitemarks such as Investors in People, Centre of Vocational Excellence, Beacon status and Charter Mark. A second was effectiveness in working in partnership, which was seen as a very important part of many colleges’ current work and their role as key strategic players in a local area. Value-added and distance travelled were also suggested by several respondents. Many commented on the need to include equal opportunities, diversity and widening participation, based upon a local area rather than single institutions.

**Question 8**

Do you agree that the approach to determine the KPIs, as proposed in Section 5, should include an element of qualitative assessment as well as quantitative measures?

46 Just over 80 per cent of all respondents agreed with this question, with rather over 80 per cent of FE colleges agreeing but only 50 per cent of sixth-form colleges doing the same.

47 Nearly every respondent believed that there should be an element of qualitative judgement, although how it might be used and validated was seen as more difficult. A respondent who favoured only the use of quantitative judgements stated that such judgements were more transparent, objective and intelligible.

48 Qualitative judgements were felt to be valuable in capturing learners’ progression and diversity. Quantitative measures were seen as too mechanistic and could lead to a tick-box approach. Suggestions about how qualitative judgements could be undertaken included peer reviews performed by trusted and experienced professionals and qualitative self-accreditation between colleges.

49 Respondents were aware that the way in which qualitative judgements are used and weighted would be a difficult issue. Should there be equality of weighting between quantitative and qualitative judgements? Who would moderate and how would the moderation be carried out? How could increased bureaucracy be avoided? These were all key considerations. Above all, the advocates of the use of qualitative as well as quantitative judgements believed that this would better reflect
the complexity and diversity of individual organisations and would anchor judgements in the appreciation of specific contexts.

**Question 9**

Do you think that all the KPIs and dimensions should carry the same weight or significance when contributing to the overall performance weighting? If not, what should be the weighting or significance placed on the KPIs and/or the dimensions and why?

50 Well over 60 per cent of respondents felt that the KPIs and dimensions should not carry the same weight. This reached about 75 per cent for FE colleges, and about 70 per cent for sixth-form colleges.

51 Advocates of the minority view, which felt that KPIs and dimensions should carry equal weight, put forward several arguments in favour of this approach. They thought that weighting would introduce inconsistency. The perception of equal value in each area required equal weighting and to allocate different weightings would never satisfy everyone. Some felt that for the trial period, equal weighting should be applied and then revised in the light of experience.

52 The great majority who felt that weighting should differ offered a number of arguments. Some stressed that weighting needed to take account of the specific mission of each institution in a highly complex and variable sector. For example, employer responsiveness would carry less weight in a sixth-form college than in an FE college. Newbury College noted that: ‘It is very difficult to imagine a situation where a small, work-based learning provider in one part of the country can be judged using the same criteria with the same weighting as a large FE college at the other end of the country.’

53 Others commented that to weight differentially meant that an overall measure was not feasible or achievable. There was a near-universal view that the weighting applied to finance should be less than that applied to effectiveness and responsiveness. A strong view was that the highest weighting should be accorded to the areas that most affected learners, in particular the quality of the provision offered and their success. As Peter Symonds College put it: ‘If the learner experience is really good, there should be no possibility of the star rating being imperilled by a building programme having a temporary impact on a current ratio.’

54 Some stressed that what mattered most was the programme and curriculum area. Outcomes should certainly include employability. Others felt that delivery against plan should be important since each plan related to the institutional mission. The ALI stressed higher weighting of those elements that impacted most upon the learner, with national weightings for regional or sector variations, but recognised the problem of meeting the needs and expectations of the outside world.

55 Ofsted and others argued that a weighted scorecard was the best answer because it would capture the diversity within the sector. The actual weightings should be agreed between the LSC and each local institution to reflect local and regional needs and priorities, and institutional specialisms.

**Question 10**

Do you think that the requirement to assess the dimension against the five-point scale places a significant additional burden on colleges and providers? If so, please explain why.
56 Over 50 per cent of all respondents believed that the requirement to assess against a five-point scale did pose additional burdens, with just over 60 per cent of FE colleges and a slightly lower percentage of sixth-form colleges agreeing with this statement.

57 Individual comments on question 10 have a distinctly less enthusiastic tenor than the headline figures imply. Although certainly a number of providers felt that it would not be a burden, more thought that it would. They made two major objections. The first was that the use of two scales would be confusing. It was pointed out by Ofsted and many colleges that a four-point scale had only recently been introduced after much consideration. It would not be wise to depart from it, not least because it was an essential foundation of self-assessment.

58 The second point was that such a change would increase the burden of bureaucracy and would require expenditure on staff training. More generally, the view was that this requirement was to little purpose, though it was appreciated that a way needed to be found for identifying underperforming – in the sense of coasting – institutions. If the Ofsted four-point scale were used, there would be a need for some adjustment to take account of this.

Question 11
Do you agree with the interim arrangements for grading scales proposed in paragraph 49?

60 The answers to this question were very similar to those for question 10. There was little enthusiasm for the interim arrangements and the point was made again about confusion arising from the use of two scales. Others pointed out the urgent need for early agreement between key parties on the use of a single, consistent system.

61 Some variations to the interim arrangements were suggested. The Learning and Skills Network (LSN) pointed out the potential confusion arising from two scales and stated that: ‘There is little sense in which learners, communities or employers could really benefit from two parallel structures in education and training’. Overall, there was a strong desire to use an agreed and consistent scale from an early date.

Question 12
Do you think that the overall performance should be a star rating, a one-word descriptor or a combination of these?

62 Responses to this question varied. The two preferred options across a significant majority of respondents were for either a statement or a combination of a statement with a one-word descriptor. Sixth-form colleges indicated a clear preference for a statement only. For all categories, the star rating attracted less than 10 per cent support.

59 About 35 per cent of all providers agreed with the interim arrangements, with around 30 per cent of FE colleges but under 10 per cent of sixth-form colleges supporting this.
The detail of the comments was more complex and less stark than these figures imply. The strongest statements made were for and against the star rating system. Advocates of the use of the star rating alone valued its simplicity: ‘The star rating is easily understood and works well’ (a local authority) and: ‘A star rating, though crude, carries public meaning and as a result can have a powerful impact on driving up performance’ (another local authority).

Support for the star rating was greatly outweighed by those who did not wish to see the use of the star rating in isolation. It was viewed as crude and simplistic and there were several references to its alleged failure within the NHS. The Sixth Form College Farnborough argued that: ‘Reducing the complex work and performance of colleges to a single descriptor or star risks trivialising the work of colleges’ and another FE college noted that: ‘Star ratings are simplistic, confused with hotel ratings and have not been shown to affect the way customers view NHS or council provision’. Dearne Valley College put the argument from the consumer’s viewpoint: ‘Picture the potential scenario of a young person making a post-16 decision in an area where the college is deemed to be a 2-star or “satisfactory” college, but the only other choice is a school sixth form for which there is no external performance assessment’.

Beyond these strong views, there was a range of opinions that tended to favour statements or combinations of star rating, descriptor and statements. The overall view was that colleges in particular were too complex to be easily described without some qualification or explanation, and that aggregation distorts and conceals.

Question 13

Do you think that your organisation or those you represent will have difficulty in implementing the Framework, and if so, why?

Overall, about 25 per cent thought that they would have difficulty with relatively little difference between this percentage and the percentages for FE colleges and sixth form colleges respectively. Over 30 per cent of sixth-form colleges had no opinion on the matter.

The majority who thought they would have no difficulty made some important qualifications. Some found it difficult to answer, given the information currently available. There was a widespread view that implementation would require extra resources and would mean diversion from frontline support for the learners. The need for effective trialling and piloting was emphasised. Above all there was a strong plea that the key players, LSC and Ofsted, reach clear agreement on what grading they wished to use, and for very clear guidance and a planned transition, and not allowing the Framework and CIF to exist in parallel.

In its reply, Ofsted showed a strong commitment to working with the Department for Education and Skills (DFES), LSC and Quality Improvement Agency (QIA) to address such matters as differences between the range of performance indicators, the further development of New Measures of Success and resolving possible differences in judgements between the two frameworks. As a sixth-form college commented: ‘The devil is in the detail and the timeframe. Previous initiatives have lacked training and sensible timeframes’.
Another respondent suggested it would be better to support colleges in becoming more adept at using existing systems such as the CIF rather than introducing new ones. Particular concern was expressed by HE providers of FE about how the Framework and KPIs could be accommodated within their practices. It was noted that differences in the financial arrangements for local authority providers might make a difference. Despite these doubts and fears of increased bureaucracy, a number of respondents welcomed the Framework as a step towards self-regulation.

Question 14

Do you agree with the proposed schedule for the operational introduction of the Framework for Excellence set out in Section 7?

![Graph showing responses to Question 14]

70 The proposed schedule was rejected by over 40 per cent of all respondents and higher proportions of FE colleges and sixth-form colleges (a majority in each case).

71 Clear themes emerged from the detailed comments. There was a widespread view that, whenever introduced, the Framework should apply to all providers simultaneously, rather than sequentially for different groups. Many also wished to include school sixth forms. Many respondents, including Ofsted and the ALI, held that the proposed trialling of September to December 2007 was too short a timescale and too limited in its coverage.

The credibility of the introduction of the Framework would owe much to the effectiveness of the trialling. Luton Sixth Form College commented that: 'The timescale is extremely short to achieve real change, consolidate it and then be measured and the college held publicly accountable'. There was a strongly held view that the Framework should not be introduced until 2008 at the earliest. Some advocated 2009 so that it could coincide with Ofsted’s review of the CIF. To introduce the Framework before this risked having to change it again in the light of future changes in the CIF.

73 It was also pointed out that there was a remarkably small gap between the publication of the standards in June 2007 and their introduction in August of the same year. Even those who thought that it might be feasible to introduce on the proposed date stressed the importance of effective consultation and guidance to enable this. Past experience had shown that there was commonly slippage in schedules that made the proposed timescale very ambitious. Many colleges would be working towards the implementation of the 14–19 diplomas from 2008, which represented a significant burden. The ALI’s summative comment was: ‘Too much, too soon for too many providers in too many contexts’.

Question 15

Is there anything else you would like to add?

74 This yielded a large volume and range of ideas. Some reflected responses to earlier questions, in particular acute disappointment at the failure to include school sixth forms, concerns that the Framework might increase bureaucracy and doubts about the extent to which it was possible to develop one overall performance assessment grade. There were many expressions of support for the principles of the Framework and the movement towards self-regulation.

75 The operational proposals that flowed from the principles raised the most questions and the most doubts. Several asked what would be published and commented that the publication of self-assessment reports (SARs) would diminish their effectiveness in providing searching analyses and would shift them in the direction of marketing documents.
There were strong pleas that the principal agencies involved needed to work much more closely together, not only LSC, Ofsted, DfES and QIA but also possibly the Higher Education Statistics Agency (HESA) and Quality Assurance Agency (QAA) in mixed-economy institutions.

Several expressed doubts as to whether the Framework would itself secure improvement as distinct from reflecting improvements, which institutions were already implementing. From this, it was but a short step to ask what value the implementation of the Framework would add to the system. There was a fair degree of willingness to work with the Framework in piloting and development in the hope and belief that this input would improve its relevance and realism, which in turn would make it more acceptable. It was felt important that the final Framework unite quality assurance and quality improvement into an overarching Framework.

It was also strongly argued that credibility would be enhanced if the LSC were to make clear what was being discarded when introducing the new system. As one college challenged: ‘If we adopt this assessment framework approach, what, in all seriousness, can we safely give up by way of compensation?’