



UVAC RESPONSE TO OFSTED CONSULTATION: IMPROVING THE WAY OFSTED INSPECTS EDUCATION

Introduction

UVAC is a not-for-profit member organisation representing 80 HEIs who deliver a range of work-based learning programmes, including apprenticeships, from Level 3 to Level 7. Recognised as leaders in supporting quality of delivery and research in all aspects of work-based/work-integrated learning, including apprenticeships, UVAC has been the voice of the world-class higher education (HE) sector, informing policy, process and practice for more than 25 years. UVAC has 80 UK university and HE providers in its membership, all of whom deliver apprenticeships.

UVAC's expertise in supporting the sector to deliver high quality apprenticeships has been recognised by the Department for Education, being one of 5 partners delivering the Apprenticeship Workforce Development (AWD) programme to support the dissemination of best practice and leadership in delivery. Additionally, UVAC provides proactive support and networks for universities and HE providers to share best practice for designing, developing and delivering skills-based programmes from Level 4 to Level 8, as well as supporting the sector to understand regulatory and compliance requirements. UVAC also commissions and undertakes significant research in work-aligned learning and skills and disseminates these through the publication of papers and via its academic and peer reviewed journal *Higher Education, Skills and Work-Based Learning* published by Emerald six times a year, with an international authorship and readership.

UVAC shares the aim with Ofsted to "raise the standards of provision in vocational, technical and skills-based education to improve the opportunities for all" whilst meeting the needs of organisations and businesses to have a knowledgeable and skilled workforce. UVAC welcomes the opportunity to engage in a constructive and collaborative relationship in direct dialogue with Ofsted, to work together to achieve this shared aim – supporting the dissemination of good practice, whilst ensuring that the key characteristics and distinct features of higher education (as the only world-class sector described as such and with a number of UVAC's members consistently rank among the

top institutions globally) are fully encompassed and (more importantly) recognised within the new framework.

UVAC particularly welcomes the intention of inspections being “done with” rather than “done to” and to support this, our recent research (Lester, 2025) specifically highlights that there is a need for those inspecting HE providers to have experience of:

- Working in the HE sector, apprenticeships, and specifically higher and degree apprenticeships, so that the HE context as an awarding body and the interrelationship between the numerous (and sometimes conflicting) stakeholders (e.g. Professional and Statutory Regulatory Bodies (PSRBs); Office for Students (OfS)) is fully appreciated by inspectors.
- The industry context and the professions that they are inspecting - not just the subject area, but how practitioners work in the organisations in that sector. This is particularly important in the context of Level 7 apprenticeships.
- Working with older and mature learners – ‘18-40 (or older) rather than 16–19-year olds’ - whose personal and professional development needs are distinct from those younger than 19.

Proposal 1: Report Cards

The proposed **structure of the report cards** will provide a clear overview of the strengths and weaknesses of the provision in the evaluation areas, however some of the valuable detail from the current reports may be lost. To ensure the detail arising from the inspection is preserved, the supporting narrative alongside the grade should summarise the findings as well as providing an evaluation (rather than a description) of the key strengths and areas for the provider to develop and enhance. It should be clear from the narrative why the grade has been reached and where improvements are required to enhance the grade in future inspections. This approach will be of value to the provider, current and potential learners, employers and others within the sector, so that good practice can be shared and disseminated for the good of all, with Ofsted reports being a key source of information to enhance the overall provision of Level 4 to Level 7 training.

The **evaluation areas for inspection** should cover:

- The effective co-design and, where appropriate co-delivery of the curriculum, ensuring that the acquisition of relevant knowledge and skills is embedded within the curriculum with effective co-ordination between the provider and the employer, to provide a holistic and cohesive learning experience for the learner, with assessment tasks drawing on authentic working activities to effectively support the management of workloads, and thereby the work/life/ study balance for mature adult learners;
- Achievement, with an emphasis not just on progression and grades achieved, but the impact of the learning on businesses and organisations and the learners

themselves - for example, taking on additional responsibilities or gaining promotions compared to their start points.

- Developing teaching and learning - how are tutors/lecturers/practitioners supported to develop and maintain their professional and pedagogic knowledge in the context of the profession and industry in which they are teaching. How are they supported to ensure that their industry contextual knowledge is current and relevant?
- Participation- consideration about how participation is monitored and evaluated by the provider. Simple attendance statistics often do not reflect the diversity of delivery methods that a well-designed blended learning programme offers. For example, where provision cover a wide geographic area to meet the needs of an employer, a combination of face-to-face and online learning may be used, with both synchronous and asynchronous online learning.
- Leadership – do leaders have sufficient oversight of the provision and are governance arrangements robust.
- Inclusion – in the context of HE providers, inclusion goes beyond learners with SEND. Inspectors should consider how well a provider supports the widening participation agenda, encouraging and enabling those from disadvantaged backgrounds or ‘first in family’ to enter programmes that provide an opportunity to enter a profession, or gain professional status.
- Safeguarding – these are adult learners, and consideration should be given to supporting their welfare and wellbeing in this context, including the effective management of workload.
- Contributing to meeting skills needs – how does the HE provider work with employers to ensure that graduates are making effective contributions in the workplace?

The introduction of a **5-point grade scale** to grade different areas of a provider’s work provides a more nuanced and in-depth evaluation of the provision than the current 4 point scale and supports the continuing development and enhancement of provision. It recognises that improvements can take time to show significant impact in outcomes, particularly where programmes are 3-4 years or more in length, which is the situation for many Level 4-Level 7 programmes in universities and HE providers. The 5-point scale enables initial improvements to be recognised and supported towards further improvement, without detriment.

However, the **definition of exemplary**, “a provider where all evaluation areas are graded as at least secure and, within an evaluation area that is consistently strong, there is a feature of practice that could be considered as exemplary” leads to some confusion, given that there is to be no overall judgement of effectiveness. It would suggest that only a specific element of work may give rise to the exemplary grade and thus this would seem to be a 4-point scale with recognition of exemplars of good practice. It would be preferable to have a clear definition of exemplary that is holistic across the evaluation area, and not reliant on specific elements or examples. Will inspectors have to look for

these exemplary features, or are they expected to arise naturally during inspection activities? There is concern that inspectors will not have time or do additional work to identify exemplary features, within the confines of the inspection, and this then becomes subjective and lacks consistency of approach.

Questions also arise about consistency and the work of the moderation panel. UVAC would recommend that where HE providers are concerned, the national quality and consistency panel should include members who have recent experience of working in skills provision in HE, as they will more effectively be able to identify truly exemplary practice. There is a need to be realistic about what is transferable across sector, organisations and providers.

When considering benchmarking and the **use of data**, HE institutions work in a significantly different context to schools and colleges, often working beyond local and regional boundaries and so, whilst the data can be used to inform the general background, there may be other data, specific to universities and HE provider and within that specific subjects, that would be more beneficial to the inspection team. For example, it may be that the characteristics of learners need to be provided across the provision type and within subjects with outcomes data aligned to specific groups, such as those with additional learning needs and for those who are 'first in family' to attend university or access higher level learning.

University/HE learners are adult learners who need to effectively manage work/study/life balance, and programme delivery arrangements should be designed to reflect this alongside the operational needs of the employer. Learners may work shifts, be geographically dispersed and/or have caring commitments. Thus, definitions of **absence and attendance** need to be considered in this context. 'Attendance' may be using online recordings of sessions or engaging with asynchronous online learning materials on study days allocated by the employer in addition to, instead of, or to complement face-to-face sessions. It is therefore engagement and understanding of the materials that needs to be monitored rather than attendance.

The **key outcomes data** should include not only achievements and assessment grades but also consider impact of the learning on the learner from their start point (e.g. additional responsibilities; promotions) and the organisation (examples of projects that have improved the business/service provided). It would be more appropriate for Ofsted to adopt a broader approach to inclusivity, beyond learners with SEND, and thus to define more clearly what they mean by "barriers".

Proposal 2: Education Inspection Toolkits – Further Education and Skills (FES)

The Further Education and Skills Toolkit, attempts to provide criteria for the evaluation of provision in the key evaluation areas. However, UVAC members would welcome further clarity in differentiating between strong and secure grading. The current definitions are generic and are open to individual inspector's interpretation - again potentially leading to lack of consistency across the provision and the sector. The

exemplary grade descriptors would benefit from contextualisation to the area, rather than the current repetition and emphasis on the role of leaders.

UVAC would assert that there are significant differences in curriculum development, delivery and management between the different provider types in FES and we believe that specific, contextualised toolkits for HE, independent learning providers and colleges would provide clarity for providers, employers, learners and inspectors, and would help to ensure consistency within the inspection process. We would welcome the opportunity to work with Ofsted to develop toolkits, or contextualised guidance pertinent to the HE sector to clarify and contextualise the criteria, reflecting the different context of HE providers. This was promised at the time when Ofsted became responsible for all apprenticeship training but never materialised. This was an erroneous oversight.

For example, we would note that the following areas that would benefit from clarity and expansion, in the context of HE providers:

Leadership - Stakeholder engagement needs to reflect in more detail the diverse range of partners, recognising the important role that Professional Statutory Regulatory Bodies (PSRBs) play particularly in HE as well as the recognised good practice of co-creation (Bravenboer, 2016) and co-delivery of the curriculum.

Inclusion - It would be of value to specifically mention widening participation and recognise the work that is done to provide pathways into professions and access to professional qualifications for learners whose social circumstances mitigated against HE previously. HEIs play an important role in upskilling the workforce (particularly in health), providing progression pathways and access to HE in graduate professions (e.g. teaching; policing; law) which could not have been achieved without the apprenticeship route. The work that universities do to prepare, empower and encourage learners in this situation should be recognised. (Anderson, 2018; Garnett, 2020)

Safeguarding - The differentiation between adult learners and those under 18 is welcomed.

Curriculum - Reference is made only to curriculum design and development, with no reference to implementation and impact. It is vital that the co-creation of the curriculum with employers at programme level is recognised here - not just at a strategic level. Furthermore, working in collaboration with employers ensures that there is effective co-ordination of the on-and off-the-job learning.

There is insufficient consideration of the teaching, learning and assessment strategies used that support learning. Universities and some HE providers are the awarding body, therefore the assessment strategy and format of assessments is in their hands, and should draw on authentic forms of assessment that enable learners to evidence the application of their knowledge of theory into practice, being mindful of the assessment workload and the alignment of assessment to the KSBs of the apprenticeship standard, and potential, PSRB competencies.

Developing Teaching and Learning - It is pleasing to see the inclusion of keeping up to date with professional practice is recognised in the “secure” grade, this emphasises the need to tutors to maintain industry- based experience, knowledge and skills as well as educational practice.

Achievement - Achievement goes beyond tests and examinations and should consider wider achievements within the programme and at work. For example, the impact that work-based projects have had on the learner and the workplace; additional responsibilities and promotions.

Participation and development - As noted previously, consideration needs to be given to definitions of attendance and participation for online programmes - particularly those which include significant elements of asynchronous delivery.

Adult learners, particularly those on a 3- or 4-year degree apprenticeship, have challenges in managing their work/life/study balance, particularly where shift work is involved. In some instances, the PSRB requirements mean that the curriculum is particularly demanding and time pressured. It is not clear therefore, why adult learners need to be equipped with knowledge of British values, diversity and respect for the protected characteristics by an education provider. In our experience, many adult learners are frustrated by the inclusion of these elements in their programme, even where it includes the caveat of “age- appropriate”. Adult apprentices sometimes feel patronised that the curriculum includes these elements and consider them a time-consuming distraction from their key themes of study, unless the factors are implicit within the curriculum or occupational competencies, for example, in policing and health.

Proposal 3: Inspection Methodology

UVAC recognises and values the importance of transparent, open and evidence led approaches to inspection, where provider staff and inspectors have a positive working relationship. We recognise that in some providers the Deep-Dive methodology was time pressured for inspectors, but it did provide a clear focus and structure for the inspection, which facilitated the organisation and management of meetings during the inspection. It provided clarity about which staff were required and during what time period, and, in particular, enabled discussions with employers to be arranged to mutually convenient times. Staff who were not subject to a deep dive were therefore not subject to further stress during the week. Thus, the methodology provided a consistent approach to inspection, from which the sector could learn.

It is not clear from the new proposed methodology how this consistency will be achieved, with different areas to focus on and different activities undertaken. There is the potential for many more staff to be “on standby” during the inspection and thus the potential for more disruption to the everyday business of the provider, increasing the amount and duration and anxiety for more staff. The flexibility of the inspection schedule will increase the workload of staff arranging appointments and meetings and

with less notice, which could be challenging for some external stakeholders, and in particular employers.

UVAC suggests that the focus of inspection should be on the quality of the curriculum for adult learners – this is the purpose and focus of their studies and needs to ensure that the curriculum equips learners to competently carry out the role for which they are studying. We would argue that the way the curriculum is co-created, delivered, assessed and quality assured underpin the learners’ experience and the outcomes of the programme. This is where universities differ from other providers in that they are responsible for all aspects of the design, delivery and assessment. Leaders within universities must have oversight of the different elements of the provision, whilst putting in place significant quality assurance and enhancement processes to continue to develop and improve the learner and employer experience, ensuring that programmes are relevant to contemporary sector practices.

Summary

UVAC would welcome the opportunity to be involved in direct discussion with Ofsted about the proposed changes to the inspection framework. With ~ 80 members we are uniquely placed to represent the voice of the HE sector and to ensure that the unique aspects of HE providers as both awarding body and deliverer, as well as being pivotal in the relationship between employers and PSRBs are considered within the reforms. Adult learners’ needs are different to those of under 19s and it is gratifying that the reforms have begun to recognise this, with the introduction of some age-appropriate elements. We would invite Ofsted to review the personal development elements of the criteria in this regard, noting that adult learners’ on 3 or 4 year programmes, personal development needs differ significantly from those of younger learners, and this needs to be recognised in terms of work load and work/life/study balance. Further consideration needs to be given to definitions of inclusion, attendance and engagement to reflect the needs of learner and their employers.

The reforms need to continue to support the raising of standards of education and skills development for all learners, and if Ofsted and UVAC work in partnership to support the dissemination of exemplary practice across the HE sector, outcomes for Adult learners will continue to improve, providing more access to professional roles to a wider range of learners as well as addressing the skills needs of the local regional and national population.

References:

[Anderson, A.](#) (2018), "A View on the Most Change in Vocational and Technical Education in England for a Generation", *Higher Education, Skills and Work-Based Learning*, Vol. 8 No. 2, pp. 113-116. <https://doi.org/10.1108/HESWBL-05-2018-102>

[Bravenboer, D.](#) (2016), "Why co-design and delivery is “a no brainer” for higher and degree apprenticeship policy", *Higher Education, Skills and Work-Based Learning*, Vol. 6 No. 4, pp. 384-400. <https://doi.org/10.1108/HESWBL-06-2016-0038>

Garnett, J. (2020), "Work-based learning tools to inform the implementation of degree apprenticeships for the public sector in England", *Higher Education, Skills and Work-Based Learning*, Vol. 10 No. 5, pp. 715-725. <https://doi.org/10.1108/HESWBL-06-2020-0134>