

Shared on behalf of Early Years Scotland Members

## **Response to Consultation on Shared Inspection Framework: A Quality Framework for Early Learning and Childcare, School-aged Childcare, and Childminding Services**

### **Stage one evaluation questions**

5. Between the two existing frameworks there were 28 indicators. There are 16 indicators within the draft shared framework document, do you consider this to be suitable? \*

**No**

6. Is it clear which quality indicators in the framework apply to those services delivering funded early learning and childcare? \*

**No**

7. Will the content of the shared framework support self-evaluation and action planning for improvement? \*

**No**

*Early Years Scotland does not believe that the draft framework document in its current form, would provide effective and meaningful support for self-evaluation for the sector. The document requires a significant rewrite to be fit for purpose.*

8. Will the illustrations in the shared framework support the delivery of high-quality care, play and learning experiences for children? \*

**No**

*Early Years Scotland, as part of the Shared Inspection Framework Stakeholder Group recommended the removal of the 'weak' illustrations early in the discussions, as we do not feel this supports aspirational early years practice. We were informed that the initial consultation feedback suggested that the sector wished to retain reference to weak illustrations. The inclusion of these often-lengthy weak illustrations adds to the already extensive 87 pages of the framework and are written as the polar opposite of the very good illustrations, which is not helpful.*

9. Is the language within the shared framework easy to understand? \*

**No**

*The draft framework does not flow for the reader, and there is excessive repetition including duplication from the two current frameworks, HGIOELC and the CI Quality Framework. There is a need to 'read across' the indicators and each QI needs to articulate with its neighbour, enabling readers to appreciate it is a level playing field of application by inspectors. It requires significant editing before this draft would provide that level of clarity and consistency of approach to inspections.*

10. Do you think the images of the Health and Social Care Standards and the National Standard are helpful? \*

**No**

*The images used in this current draft are not explained well and do not appear relevant or useful within the document. For example, the use of different images of scales and the rationale for their inclusion is not clear. There is also no reference to the 6-point scale for grading and therefore there is a lack of clarity regarding how the shared framework will work in practice.*

*It is crucial for the sector to clearly understand how this framework will be universally applied by both the new Education Scotland body and the Care Inspectorate. We believe that it would be prudent to wait until the Education Reform process has been completed, before issuing such an important framework for the sector.*

13. Do you have any other comments about the shared framework document. (maximum 250 words).

### **General overview**

1. It is critical for this new shared framework to be referenced to the national practice guidance for early years in Scotland, Realising the Ambition: Being Me (RtA). Furthermore, there is significant scope for the proposed quality indicators to be underpinned by current research, in particular to reflect what is known nationally and internationally about how children grow and develop, and transition within and across settings and sectors.
2. The aim of the new shared framework was to provide clarity, including roles and responsibilities of the CI and the new body to replace ES, to ensure consistency of approaches to inspection, promote a common language, streamline bureaucracy, be supportive and reduce burdens and stress on the workforce. In its current form, the draft shared framework does not come close to achieving the stated aim outlined above. Professor Muir 'recommended' a shared inspection framework for the reasons stated above, however we are concerned that this draft and the current plans for implementation will cause added stress and confusion for an extremely pressurised early years sector that is already heavily inspected.

There is very little reference to School Age Childcare (SAC) within the document and it is unclear which QIs will be applicable to childminders. We have childminding members, as well as ELC settings with SAC, and whilst the introduction aimed to offer clarity for the whole sector, this is not evident in this current draft. There is no clear reference to provider specificity enabling all providers to be clear about which QIs are relevant to them.

3. The draft for consultation reads as two separate frameworks with bits of the existing CI quality framework and HGIOELC cut and pasted together. It is challenging to see what is 'new' within most of the 16 proposed QIs. The QI table on page 14 provides an overview of the 16 QIs. The overview presents a hotchpotch of QIs that do not align with the internationally adopted EFQM model of quality assurance (process QIs and outcomes QIs would normally be displayed in separate columns).
4. The process for developing the draft shared framework suggests greater involvement by EYS than was the case. (See page 4) The statement on page 4 is misleading and needs to be rewritten to provide an accurate account of the minimal involvement by EYS and

other stakeholders. There are many fundamental elements of the document which could have been addressed at an earlier stage, had they been shared with stakeholder representatives for input prior to consultation.

5. The early childhood workforce anticipated the *new* shared framework would address current concerns around excess scrutiny. It is unclear from the narrative (see page 6 of the draft shared framework) how the two agencies will achieve a reduced scrutiny burden on ELC settings and on PSNCs.
6. There is no clear justification as to why inspection methodology will be developed in isolation from the proposed piloting and implementation of the new shared framework. The timescale for the reform of ES will increase levels of uncertainty for the ELC workforce: will sector specific information set out who, when and how often a setting receives a joint inspection or a single inspection? Will sector specific information be an online resource to ensure the framework is responsive to changing practice/legislation/policy?
7. There is no explanation of a six-point scale, despite the fact that each QI theme is supported by a 'very good' and a 'weak' illustration. A further concern with regard to the narrative in many of the very good illustrations, is their lack of consistency and aspiration. Many of the illustrations read as 'good' and yet are badged as 'very good'.

As highlighted in question 8 response, almost all of the 'weak' illustrations are presented as polar opposites to a 'very good'. Content in the illustrations do not consistently match up with the QI descriptors, rendering the illustrations unhelpful as part of a robust self-evaluation process. The inclusion of 'weak' illustrations should be reconsidered as they dumb down an aspirational approach to the pursuit of high quality ELC provision.

8. A thorough edit of the terminology used by the two agencies would improve consistency of message and be better understood by those expected to use the framework for self-evaluation. For example, inconsistent and conflicting use of ELC, care and education, care and learning, early education, care play and learning, all these terms seem to be interchangeable and yet they are understood by educators with a sound knowledge of early childhood research as distinctly different concepts.
9. The ELC sector workforce is made up of educators who identify strongly with a child-centred approach where play as pedagogy is the norm. QI 1.9 teaching and assessment sits at odds with the pedagogic culture within the EC sector. Significant redrafting is required.
10. Several of the QIs require to be rewritten or deleted to strip out duplication, to reframe them in line with ELC in Scotland's unique pedagogic culture, to reflect national guidance RtA and to avoid reputational risk to the sector.

Looking ahead-what can be done to achieve the Muir report recommendation of developing a new shared quality framework.

### **Possible options to consider**

1. Revisit the Muir report recommendation and challenge the need for a shared framework-status quo for a period of time.
2. Pause the development of a shared framework until after the reform of the approaches to education inspection by SG and new approaches are established/embedded. The

process needs to slow down and tackle this in a different way to ensure we achieve effective, meaningful, and transformational support for the sector.

- 3 Appoint a different writing team external to both agencies to revisit the draft and align revised content with RtA, involving all stakeholders in its development and implementation-promoting innovation and relevance to the ELC sector in Scotland.