

May 2024

---

## Ofsted: The Big Listen – The Bell Foundation's response

For further information, please contact:

Alastair Feeney  
Policy and Public Affairs Officer  
01223 275518  
[Alastair.feeney@bell-foundation.org.uk](mailto:Alastair.feeney@bell-foundation.org.uk)

[www.bell-foundation.org.uk](http://www.bell-foundation.org.uk)



## The Bell Foundation's response to The Big Listen

### Schools

- [Reporting on inspection and regulation](#)
- [Inspection practice](#)

### Further education and skills

- [Reporting on inspection and regulation](#)

### Schools

Please tell us what you think Ofsted's priorities should be when reporting on inspection and regulation, and why, and what we can improve.

The Bell Foundation welcomes the focus of this consultation on disadvantaged and vulnerable learners, many of whom are children and young people exposed to a language at home that is known or believed to be other than English (Department for Education, 2023) and who are pupils in schools. In both the schools and further education and skills (FES) sections, the Foundation's response will focus on children who are recorded to have English as an Additional Language (EAL), and in particular, on those children within this group who experience disproportionate underachievement. Our response in this section refers to this group as "multilingual pupils who use EAL".

According to a Department for Education (DfE) analysis of 2018 National Pupil Database (NPD) data, 25% of pupils who use EAL are "disadvantaged", which is a slightly higher proportion than pupils whose first language is English (at 24%). Moreover, 41% of children who use EAL living in the most deprived areas will be in the early stages of developing English language competence, which is the group at risk of under-performing compared to their English-speaking peers. By contrast, in a less deprived area, only 27% of pupils who use EAL will be at the early stage of developing language competence (DfE, 2020).

For some multilingual learners who use EAL, research shows a clear attainment gap: (1) learners who are new to English or at the early acquisition stage, as their likelihood to succeed will be strongly influenced by their mastery of the language of instruction, English. (Strand et al., 2015, Strand & Hessel, 2018); and (2) learners aged 13-16 who are newly arrived in England, seeking to access education late (from year 9), and have not been schooled in the English medium (Hutchinson, 2018).

***"Research shows that there is a clear link between proficiency in English and attainment...which explains up to six times as much variation in achievement as gender, free school meals and ethnicity combined."***

Data from the latest School Census (DfE, 2023) show that 1,715,912 pupils (20.2% of all pupils) in state schools in England were recorded as having a first language known or believed to be other than English, continuing a recent trend of increases. An increasing number of schools and academies are also welcoming refugee communities for the first time – learners who have been forced to flee their home countries, may be experiencing trauma, and have now joined a new school with potentially limited or no proficiency in the language of instruction. Research shows that there is a clear link between proficiency in English and attainment for these learners, which explains up to six times as much variation in

achievement as gender, free school meals and ethnicity combined, underlining the importance of ensuring effective and tailored provision is in place (Strand and Hessel, 2018).

Reporting on the attainment of these pupils and on the performance of schools requires the availability of appropriate data to enable inspectors to make accurate judgements. Until 2019, inspectors had access to data on attainment and progress by pupil group collected by the DfE through Analyse School Performance (ASP) and produced specifically for Ofsted inspections and Inspection Data Summary Reports. As these have since been discontinued, no progress or attainment data on pupil groups is visible to inspectors.

The Foundation is concerned that schools' and academies' performance regarding how they support multilingual learners who use EAL, and how these learners learn is significantly underreported in school reports. The Foundation conducted wordsearch analysis of recent inspection reports using Watchsted (an online factual tool that shows the most recent reports from Ofsted Inspections in England), and this analysis showed that only 424 primary school reports out of 12776 (3.3%) and 92 secondary school reports out of 2757 (3.3%) contain the phrase "English as an Additional Language" in their main findings. This low visibility or invisibility of EAL in Ofsted inspection reports, especially since the focus on EAL was removed from the Education Inspection Framework in 2019, often has an unfortunate backwash effect on schools' priorities, which tend to focus on the areas highlighted in Ofsted reports. Also, given that Ofsted inspection reports are used by the DfE to hold schools and academies to account, it is key that inspectors explicitly review the provision for multilingual pupils who use EAL, including the quality of teaching, learning and assessment in schools and academies. Reintroducing an explicit focus on this group of learners will enable inspectors to report on strengths in this area, identify areas for improvement, and support schools and academies to ensure the rights, needs and outcomes of these learners are not overlooked.

**"...analysis showed that only 424 primary school reports out of 12776 (3.3%) and 92 secondary school reports out of 2757 (3.3%) contain the phrase "English as an Additional Language" in their main findings."**

The Foundation is also concerned that the level of text density and linguistic complexity of Ofsted inspection school reports poses serious comprehensibility challenges and unnecessary barriers for multilingual learners' parents/carers, especially when they are also new to English or at the early stages of English acquisition themselves, and in doing so, they do not fulfil their key function of advising this audience.

In order to establish how comprehensible Ofsted reports are to readers whose first language is one other than English, the Foundation conducted text analysis of a sample of Ofsted's schools inspection reports using an online readability toolkit which includes the Common European Framework of Reference for Languages (CEFR) as a metric<sup>1</sup>. The scores for the analysed inspection reports were invariably C1 and C2 levels, which are advanced and proficient respectively, i.e., the two highest levels of mastery or proficiency in English, meaning that C1 users can understand a wide range of demanding, longer texts, and recognise implicit meaning; while C2 users can typically understand almost everything they read and can differentiate finer shades of meaning even in the most complex situations. In other words, the information about schools in Ofsted inspection reports is conveyed using highly complex language that only the most proficient readers are able to understand. This means that those parents or carers who are developing their competency in English are

---

<sup>1</sup> The CEFR is a widely accepted framework of language proficiency that can be used in the context of readability to reach a wider audience.

disproportionally disadvantaged when it comes to selecting schools for their child's education. This significant barrier must be addressed as a key part of improvements in reporting, and Ofsted should set the standard by modelling the good practice in accessibility for which it holds schools and academies to account.

To improve reporting, so that all parents and carers can benefit from the advice and guidance provided by school inspection reports, Ofsted should:

- **Provide guidance and training to all reporting inspectors** on how to write accessible reports using comprehensible English, with clear examples of language to use and avoid.
- **Provide report models** written in comprehensible English that set expectations of report comprehensibility.
- **Invest in a reliable readability toolkit** that includes the CEFR and require all reporting inspectors to run readability reports using this and to edit the reports for comprehensibility, if necessary, before submitting these.
- **Conduct regular standardisation of reports** with feedback to reporting inspectors on the comprehensibility of their writing.
- **Consider the use of visual aids and other accessibility strategies** that increase comprehensibility in inspection reports, such as graphs, infographics, diagrams, increased use of white space, highlighted key information, shorter sentences, etc.
- **Add a translation tool to the “find an Ofsted inspection report” webpage** where reports are accessed.

Given that schools inspection reports are trying to address a range of distinctive audiences who read the reports for different purposes (parents/carers, leaders and teachers, local authorities and/or academy trusts, local and national government), perhaps an alternative would be to write an extended technical report for the inspected school or academy, the corresponding local authority and/or academy trust, and regional and national government, and a non-technical, accessible executive summary version for parents/carers.

Do you have any comments on Ofsted's current inspection practices and whether they should change?

The Foundation is concerned that:

- Anecdotal evidence from our work with school and multi-academy trust partners indicates that informal, unreported withdrawal practices of multilingual pupils who use EAL, contrary to Government policy, have become more widespread and frequent in recent years in schools and academies, resulting in these pupils having limited and reduced access to mainstream lessons for longer periods of time. Such practices delay, and even impair, the effective academic, social, and linguistic integration of these learners with their peers and risk disadvantaging them further, and schools and academies should be held to account for such practices in inspections.
- School inspections are of variable quality and not always robust enough when it comes to EAL provision and support. Anecdotal evidence from our partner schools indicates that, during inspections, while some inspectors' comments demonstrated sound knowledge about EAL learners and an interest in ascertaining how schools assessed, recorded, and tracked pupils' progress in their proficiency in English, others showed a worrying lack of knowledge about how to foster the effective language development of multilingual pupils and their entitlements to support, sometimes leading to inaccurate judgements of the quality of EAL provision. This is evident in:

1. Instances when inspectors praised inadequate EAL interventions, such as extended withdrawal practices.
2. Inspectors confusing/conflating pupils who use EAL with SEND.
3. Comments such as “EAL students don’t need support as they ‘naturally’ pick up language fast”.
4. Unfounded criticisms, with inspectors accusing staff of falsely adding to the EAL numbers in the school register by including pupils they did not agree with, which resulted in the staff having to remind the inspectors of the Government’s definition of EAL.
5. Inspectors’ lack of awareness of English language proficiency scales and of how pupils’ levels of proficiency in English would impact the speed and depth of learning in curriculum lessons.

Given that multilingual pupils who use EAL now represent over 20% of the overall school population, that the vast majority of schools have these learners, and that in some schools over 90% of the pupils have an EAL background, this variability in inspection practices regarding EAL is of concern. The Foundation recommends reinstating the specialist adviser role for disadvantaged or EAL, and that HMI and Ofsted inspectors have regular national training on inspecting EAL and updates on EAL.

### **Further education and skills**

Please tell us what you think Ofsted’s priorities should be when reporting on inspection, and why, and what we can improve.

The Foundation welcomes the focus of this consultation on disadvantaged and vulnerable learners, many of whom are individuals exposed to a language at home that is known or believed to be other than English (DfE, 2023) and who are learners in FES provision. Our response in this section will focus on these learners, and it will refer to this group as “multilingual learners” rather than “ESOL learners” to reflect the fact that they attend a broad range of FES programmes and not just ESOL courses, and that the academic, vocational, language learning and pastoral needs of each student in this heterogeneous group are very different (for example, their English language skills vary enormously, from no English to advanced proficiency in social, vocational, academic, and professional domains; and their education, skills, and experience also vary, from no or little prior education in their home country to achievement of comparable entry to FES qualifications).

According to the latest Census data for England and Wales (Office for National Statistics, 2021), 5.1 million people across all age groups self-reported as not having English as their first language. Of these, 19% of females and 15% of males that they do not speak English well; and 4% of females and 2% of males that they do not speak English at all. This indicates that over 1 million could not speak English well or at all, a substantial increase from the 726,000 recorded in 2011. The Census data are self-reported, however, which means that the number of adults needing English language provision in England and Wales may in fact be much higher.

There is also evidence that second and third generations born in the UK may lack sufficient English language skills to handle day-to-day communication and find employment beyond casual work. The 2021 Census data show that 23,000 people who were born in the UK did not speak English at all or did not speak it well. The number of multilingual learners is high across both the FES sector and schools, where future FES learners are currently studying. An increasing number of FES providers are also welcoming refugee communities for the first time.

Without the right FES provision that supports their successful social, linguistic, and academic inclusion, these multilingual individuals are unable to unlock their considerable potential. Unfortunately, many learners within this group experience disproportionate underachievement. Specific groups of multilingual learners identified as at risk of low attainment in the research evidence are: (1) learners who are new to English or at the early acquisition stage, as their likelihood to succeed will be strongly influenced by their mastery of the language of instruction, English (Strand et al., 2015, Strand & Hessel, 2018); and (2) learners aged 16-19 who are newly arrived in England, seeking to access education late, and have not been schooled in the English medium (Hutchinson, 2018).

The vast majority of multilingual learners in FES provision currently leave ESOL programmes with language skills of a level too low to make a successful transition to further and higher education, and to function fully in society and employment. Anecdotal evidence indicates that many multilingual learners end up underemployed, working in jobs that are substantially below their educational levels, skills, and experience. This disproportionately disadvantages this group in particular, and society as a whole.

The Foundation is concerned that given the significant gaps in the data collected on disadvantaged multilingual learners in FES inspections, there is a serious risk that inspectors may be prevented from forming accurate judgements and as a result, their reporting on how well these learners gain knowledge and skills, achieve, and are supported by the provider may not be sufficiently thorough or even accurate.

Currently, only data for the number of learners on 19+ ESOL Skills for Life provision is recorded, but it is not possible to report on the number of ESOL enrolments and achievements for 16–18-year-old learners, because DfE data tables do not provide information on the number of young multilingual learners on study programmes. The same problem arises with other FES programmes: adult non-ESOL courses, vocational training/apprenticeships, functional skills qualifications, and provision for learners with high needs. As a result, the FES sector does not know how many multilingual learners enrol, how they fare once on a programme, how many drop out and at what stage, and how well they achieve. This means that neither FES providers nor Ofsted have information on the vast majority of these learners, their numbers, progress, retention, and achievement, which leads inspectors to rely only on the limited information providers make available.

**“...to reach accurate judgements about the quality of learning, learners’ progress, their achievement and their progression to positive destinations, inspectors must be given the information they need to identify trends in progress and outcomes.”**

In order to reach accurate judgements about the quality of learning, learners’ progress, their achievement and their progression to positive destinations, inspectors must be given the information they need to identify trends in progress and outcomes, to plan inspection activity, and report meaningfully on the impact for these learners. This is crucial, as both research and anecdotal evidence from providers indicates that there is great variability in FES provision for disadvantaged multilingual learners in terms of the information, advice, and guidance they are given; the availability and appropriacy of learning programmes; and the types of accommodations, adaptive teaching strategies and support offered. Examples of inadequate guidance and provision for these learners which, we are aware occurs, disproportionately disadvantages them, and for which FES providers should be held to account include:

1. **Systemic barriers which impact multilingual learners' ability to make informed choices** about their FE education, such as unclear, inaccurate, confusing, and conflicting information about accessing FE, with no information about rights and entitlements for ESOL speakers; complex admissions and enrolment processes, and complex documentation requests, and a lack of trained staff who are aware of language barriers and the rights and entitlements of refugee and asylum-seeking young people (Refugee Education UK, forthcoming).
2. **Multilingual learners aged 16–19-years-old being offered provision based on the Functional Skills English (FSE) or GCSE model**, rather than recognised and funded ESOL qualifications, which should be the option of choice for these learners, because it addresses the distinctive language learning needs of multilingual learners.

In recent years, the number of such learners on study programmes who move from ESOL Entry 3 to FSE Level 1 has risen dramatically, as many providers perceive FSE to be more appropriate than Levels 1 and 2 ESOL. Research by the Education and Training Foundation on the suitability of FSE for ESOL learners (2021) highlights concerns that FSE courses (created for learners for whom English is their first language) do not meet the needs of learners whose first language is not English, and that FSE teachers do not have the skills to teach ESOL. As a result, these learners are disproportionately disadvantaged, as they do not make the progress of which they are capable, and government spending is not being used effectively or efficiently. Anecdotal evidence from providers also indicates that GCSE English is not always the most appropriate path for these learners, as many find it extremely challenging for similar reasons to the ones explained above regarding FSE.

3. **Many learners who have passed ESOL Entry Level 3 and are deemed to have sufficient language skills to transition to mainstream provision drop out early** because they experience language overload when trying to understand teaching input and course content and meet the challenging demands of assignment writing. Without adequate enrolment and achievement data, it is impossible to demonstrate the impact of public investment in educating learners whose first language is not English, and it is of concern that inspection activity and reporting underpinned by insufficient data informs future national and regional government decision-making. By reintroducing an explicit focus on this group of learners, inspections can highlight areas of good practice, identify room for development, and support FES providers to ensure the rights, needs and outcomes of these learners are not overlooked.

As outlined above, the Foundation is also concerned that the level of text density and linguistic complexity of Ofsted inspection reports poses serious comprehensibility challenges and unnecessary barriers for both multilingual learners and their parents/carers, especially when the latter are also new to English or at the early stages of English acquisition themselves, and in doing so, they do not fulfil their key function of advising these two audiences.

In order to establish how comprehensible Ofsted reports are to readers whose first language is one other than English, the Foundation conducted text analysis of a sample of Ofsted's further education and skills inspection reports using an online readability toolkit which includes the CEFR as a metric. The scores for the analysed inspection reports were invariably C1 and C2 levels, which are advanced and proficient respectively. In other words, the information about FES providers in Ofsted inspection reports is conveyed using highly complex language that only the most proficient readers are able to understand. This means that those multilingual learners, parents, or carers who are developing their competency in English are disadvantaged when it comes to selecting FES colleges. This significant barrier must be addressed as a key part of improvements in reporting, and Ofsted should set the

standard by modelling the good practice in accessibility for which it holds FES providers to account.

In order to improve reporting to ensure that all learners, parents, and carers can benefit from the advice and guidance provided by inspection reports, Ofsted should:

- **Provide guidance and training to all reporting inspectors** on how to write accessible reports using comprehensible English, with clear examples of language to use and avoid.
- **Provide report models** written in comprehensible English that set expectations of report comprehensibility.
- **Invest in a reliable readability toolkit** that includes the CEFR and require all reporting inspectors to run readability reports using this and to edit the reports for comprehensibility, if necessary, before submitting these.
- **Conduct regular standardisation of reports** with feedback to reporting inspectors on the comprehensibility of their writing.
- **Consider the use of visual ways of presenting information** that increase accessibility and comprehensibility in inspection reports, such as graphs, infographics, diagrams, increased use of white space, highlighted key information, shorter sentences, etc.
- **Add a translation tool to the “find an Ofsted inspection report” webpage** where reports are accessed.

Given that FES inspection reports are trying to address a range of distinctive audiences who read the reports for different purposes (learners, apprentices, employers, and parents/carers, regional and national government), perhaps an alternative would be to write an extended technical report for the inspected college, regional and national government, and a non-technical, accessible executive summary version for learners, apprentices, employers, and parents/carers.

---

## About The Bell Foundation

This briefing has been developed by The Bell Foundation, a charitable, evidence-led foundation that aims to improve educational, employment and justice outcomes for people who speak English as an Additional Language (EAL). The Foundation collaborates with leading universities and think tanks to develop an evidence base and works with a network of schools to develop and deliver practical solutions to help improve the attainment of pupils who are at risk of underachieving. In 2022, the Foundation supported over 26,000 teachers and educational professionals to support children who use English as an Additional Language through the training of teachers and webinars.

A series of policy briefings about our three programmes, EAL education in schools, ESOL and post-16 English education, and overcoming language barriers in the criminal justice system, is available on our website here: [Policy - The Bell Foundation \(bell-foundation.org.uk\)](https://bell-foundation.org.uk)



