LSC Consultation Circular 02/03
Data Collection: Collection Arrangements on Learner Data

Response from the Learning and Skills Development Agency

Introduction

1. The Learning and Skills Development Agency (LSDA) welcomes the opportunity to comment on the medium term strategy of the Learning and Skills Council for collecting data on learners, and the accompanying details of the proposed content of the Individualised Learner Record (ILR) for further education institutions and work based learning providers for 2002/03.

2. As one of the Partner Organisations listed in Annex B of the Consultation Circular, LSDA has a particular interest in the establishment and maintenance of a comprehensive national dataset covering learners across the Learning and Skills sector. In recent years we have enjoyed "analysis partner" status, providing the Agency with direct access to the further education Individualised Student Record (ISR), with the kind permission of the LSC and the former Further Education Funding Council (FEFC). The analytical opportunities thus presented now form an invaluable and essential element of LSDA's research and development activities in support of the sector, particularly in the areas of learner participation, retention and achievement.

3. Given this involvement, we support the Council's wish to harmonise data collection in ways that will optimise the capture of the full range of information concerning learners that assists the fulfilment of the Council's remit. Our comments in response to the questions set out in Annex A of the Consultation Circular are made primarily from LSDA's perspective as a user of the national dataset for research and development purposes, aimed at helping to raise standards and quality across the sector.

4. As far as possible we have also endeavoured to reflect the legitimate concerns of learning providers, upon whom fall the main burdens of data gathering and recording. It is clearly sensible for the Council to harmonise arrangements across the different types of learning provider in the sector as quickly as is compatible with reasonable expectations of the necessary adjustment time. Nevertheless, by definition this process will involve most if not all providers in change in the medium term, and is likely to entail a significantly increased workload for some providers longer term, compared with the arrangements that presently apply.

5. In these circumstances, we consider it important that the requirement to collect and record any individual item of learner data must be clearly defensible in terms of the duties of the Council and individual providers to serve the interests of learners and to ensure the proper allocation of public funding. Any requirements

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to supply data at a level of detail that is widely regarded by learning providers as unreasonable in terms of the workload demands entailed are likely to result in late and inaccurate submission of data, thereby undermining the objectives of the ILR.

6. LSDA supports the key principles governing the Council's information requirements, as set out in paragraphs 5 to 8 of the consultation Circular. The development of effective strategies for planning, quality improvement and performance evaluation is dependent on timely, comprehensive and accurate data concerning learners. The Council's intention to fulfil its key determinants for data collection whilst simultaneously reducing the overall burden of data collection, taking advantage of modern technology, is likely to be widely welcomed.

7. We would, however, suggest an additional governing principle for the Council's proposals for data collection – that once the transition from the current arrangements is completed, the requirements concerning the same types of learner, engaged on programmes leading to the same level and type of qualification, should not differ between different types of learning provider. Otherwise, some types of provider are likely to feel understandable resentment that, compared to others, they have had imposed on them a disproportionate burden of costs. Any differences in the data collection requirements for different types of provider should stem primarily from differences in the characteristics of the learners they serve, and the programmes that learners are undertaking, and not from the nature of the provider.

Responses to Consultation Questionnaire – Part A

Section 1

1.   The Council's proposals to harmonise data collection arrangements by 2004/05 are supported (paragraphs 13-14 and table 1)

Agree

Comments:

8. LSDA supports the Council's aims, set out in paragraph 13, to achieve harmonisation of arrangements across the sector, provide appropriate management information on learners, and reduce the burden of data collection for providers. We also strongly endorse the underlying principle set out in paragraph 14 that data about learners should be collected once and used many times, rather than have different data collections for each activity.

9. We would, however, raise two issues. Firstly, it should be recognised that for many work-based learning (WBL) providers who do not currently make returns to more than one local LSC, the workload involved in data collection and recording is likely to increase as a result of the implementation of the Council's proposals – in some cases significantly so.

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10. Secondly, the timetable set out in Table 1 implies that, even after the transition to the new arrangements has been completed, school sixth forms could still retain the less onerous pupil level annual school census (PLASC) system. This would not support the principle that we have suggested above, that arrangements governing the same type of learner should not differ across different types of provider. We acknowledge that the extension of the ILR to school sixth forms would involve an addition to their workload, and that they would need support to implement the changes involved. However, if the ILR is felt to be the most appropriate system for full-time 16-18 year old learners in colleges, it is difficult to see why ultimately it should not also be extended to school sixth forms. We believe that common data should be collected for 16-18 year olds following similar programmes in schools and colleges, in order that valid comparisons can be made.

2. The Council's proposals to actively consult partner organisations are supported (paragraphs 15-17)

Agree

Comments:

11. LSDA welcomes the Council's proposals to consult actively with partner organisations. We particularly applaud the commitment of the Council in conjunction with the Adult Learning Inspectorate (ALI) and the Office for Standards in Education (OFSTED) to agree a set of common definitions, and to ensure that primary data on learner outcomes can be derived from the ILR to support inspections. Progress to these ends has real potential to improve the efficiency of the system, and reduce the workload of learning providers. LSDA also welcomes the Council's intention, stated in paragraphs 15 and 61, to make the ILR dataset available for analysis purposes. We look forward to discussing the Council's detailed proposals for ensuring a smooth transition from the valuable access to the ISR currently enjoyed by the Agency and other 'analysis partners'.

3. The Council's proposals to harmonise learner data collection for WBL and FE for 2002/03 are supported (paragraph 20)

Agree

Comments:

12. LSDA supports the Council's aim to achieve a single common format for WBL and FE providers for 2002/03, whilst simultaneously rationalising and reducing fields wherever possible. We also commend the intention to take account of providers' current practice and systems in the different ways in which they will be allowed to supply data to the Council. Nevertheless, many WBL providers – especially the smaller ones – are likely to require significant assistance in making

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the transition to the new system, for reasons already stated (in our response to question 1 above).

4.   The Council's proposals to develop long-term consultation and communication arrangements on data collection are supported (paragraphs 33-34)

Agree

Comments:

13.LSDA welcomes the proposed arrangements for short-term consultation on this Circular, and for long-term ongoing dialogue. We look forward to continuing the fruitful relationship as one of the Council's Partner Organisations and would be pleased to contribute to its relevant Committees and Working Groups.

Section 2

1.   (FE institutions) The Council's proposals to develop a web-portal for WBL which can be extended to FE institutions are supported (paragraph 46)

Agree

Comments:

14.LSDA welcomes this development. We believe that, so far as possible, colleges that wish for early access to this arrangement for data capture should be given every opportunity to take part in the 2002/03 pilot. We also agree that, regardless of the speed of the roll out of the web-portal, the Council should continue to provide software for institutions via the Learner Information Suite, as promised in paragraph 47.

2   The Council's proposals to support FE institutions to make more timely returns are supported (paragraph 52)

Agree

Comments:

15.We welcome these proposals, particularly the Council's intention to hold joint training sessions for LSC and college staff, and to provide more structured support for MIS staff. We would point out, though, that the high turnover of MIS staff, referred to in paragraph 51, makes it important that in their case regular phased training and support is provided, after completion of the initial stage.

16.We would prefer to see the positive use of incentives for timely submission of data rather than penalties for late submission.

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3. Options for the role of the Council in Provider Learner Record Systems (table 2, paragraph 54)

Option 2 is supported.

Comments:

17. LSDA supports the view that where the Council and key partner organisations require ILR-derived information in a particular format, they should supply providers with the means to comply. Though there are potential attractions in terms of cost-effectiveness arising from the development and introduction of a national management information system (option 3), we believe that the Local Education Authorities (LEAs) are right in their view (reported in paragraph 57) that for the reasons indicated this is not a viable option, even in the longer term.

4. (WBL providers) The Council's proposals to retain monthly returns for 2002/03 for WBL providers are supported (paragraph 66)

Disagree

Comments:

18. LSDA recommends that the requirement for monthly returns should be reviewed. If it were possible to reduce the frequency with which returns are required, then this would represent a genuine amelioration in the workload for WBL providers. Such a step could do much to offset the increased burdens that some WBL providers would encounter as a result of their incorporation in the ILR arrangements.

5. (FE institutions) The Council's proposals to retain three full ILR returns for 2002/03 for FE institutions, together with partial returns for ESF beneficiaries are supported (paragraph 66)

Agree

Comments:

19. LSDA supports the retention of three full ILR returns for FE institutions, at the broad timings and for the purposes indicated in paragraph 66. We believe that the rationale for this arrangement is generally understood and accepted in colleges. We further agree with the proposal to adjust the arrangements for the first ILR return so that in future it would encompass a record of learner withdrawals between 2 October and 1 November. Though this is likely to mean some addition to college workload, we believe that the earlier date from which withdrawals are counted will produce a more valid and accurate measure, whilst still allowing for an initial period of adjustment to learner choices after enrolment in September that does not impinge on performance indicators for learner retention.

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20. We would emphasise, however, that this change will have the effect of lowering retention rates compared with their levels under the current system of measurement. This point needs to be made clearly when data from the revised ILR is first published, if benchmarks are to be adjusted accordingly, and public and media are to be reassured that institutional performance has not deteriorated.

6. (FE institutions) The Council's proposals to request aggregate returns, derived from the LIS, three times a year are supported (paragraph 66)

Agree

Comments:

21. We support the proposals on the understanding that the intention and practical impact of these proposals is to reduce the number of paper-based returns, and ad hoc requests to colleges for information.

7. (FE Institutions) The timing of the second ILP return of the year (paragraph 69)

22. This issue primarily depends upon the administrative capacity of institutions. Therefore, we suggest that the views of providers received through this consultation should guide the Council's decision.

8. (FE institutions) Initial views on when the majority of achievement data is available.

Comments:

23. We support the Council's aim to work with institutions and awarding bodies to find mutually acceptable ways of ensuring an earlier and more timely availability of achievement data.

9. The Council's proposals on prior attainment are supported (paragraph 88)

Agree

Comments:

24. We believe that comprehensive and accurate data on prior attainment makes a valuable contribution to the development of policy and practice. Nevertheless, we regard as pragmatic the Council's proposals to limit the requirements for providers to collect this type of data. In practice, colleges have found it difficult to collect accurate data on prior attainment, with the result that the fields concerned

frequently contain a high proportion of "unknown" records, thus undermining their value for purposes of analysis.

25. As the consultation Circular indicates, institutions will keep their own more accurate records where value added methodologies make it possible to set meaningful achievement targets for individual learners, based on prior attainment. Likewise, national patterns for young learners can be subject to rigorous analysis via the DfES dataset held by the University of Bath. We welcome the Council's intention (stated in paragraph 78) to explore the feasibility and accuracy of matching this information onto FE and WBL data collected through the ILR. Over time, all learners will have records of attainment over the Key Stages that will provide the potential for a more comprehensive and rigorous assessment of progression and value added.

26. One suggestion we would make at this stage is that, where appropriate, consideration might be given to incorporating a record of prior "area of learning" (as set out in paragraph 73) as well as of level of qualification. This would enable a check to be kept on the extent to which learners moved between areas as they progressed from one level to another.

10. The Council's proposals on destinations of learners are supported (paragraph 92)

Agree

Comments:

27. Here again, we support the Council's pragmatic approach to limit the requirements placed on providers in this area whilst a feasibility study is undertaken. Longer term, though, we regard it as vital that better quality destination data becomes available, either through the ILR, or via periodic and rigorously conducted surveys. Knowledge of learner destinations after qualification makes an important contribution to our understanding of links between specific qualifications and progression to higher education or other further learning, and entry to the labour market or movement within it.

Other comments:

28. LSDA supports the view, expressed in paragraph 93 of the consultation Circular, that it would be highly desirable to identify each learner uniquely across education sector, from school, FE, WBL and HE. The introduction of a unique identifier for learners would ease considerably the currently difficult task of tracking learner progression, and thereby improve our ability to evaluate the efficiency and effectiveness of the sector, and the degree to which policy aims are being met. We recognise, however, that in the immediate future it is unlikely to be possible to resolve the data protection issues that prevent this development. In the meantime, we welcome the Council's intention to explore further "fuzzy matching"

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approaches that could help resolve some of the remaining problems involved in tracking learners in the absence of a unique identifier. We request that, if these methodologies are found to be feasible, the Council publishes guidance on their application so that users of the ILR and other datasets can follow reliable and consistent approaches to the analysis of learner progression.

Responses to Consultation Questionnaire – Part B

Section 3
Proposed changes to ILR 2002/03

1.   The Council's criteria for deciding whether to collect a data field in the ILR are supported (paragraphs 105-106)

Agree

Comments:

29. LSDA commends the principles governing the design of the Council's criteria for inclusion of data. The exclusion of data fields that apply to small numbers of learners, or can be collected more easily at programme, contract or allocation levels, should improve the cost-effectiveness of the ILR. The minimisation of year-on-year changes is also likely to be widely welcomed by providers as an easing of the burdens that fall upon them. We particularly support the Council's intention to exclude new data fields to handle temporary requirements, and to bar requests to learners for personal information that are likely to be seen as intrusive, and therefore to act as a barrier to widening participation.

Changes for both FE and WBL providers

2.   The Council's proposal to ask all providers to return the postcode of the main delivery provider for each learning aim (as described in paragraph 121) is supported

Agree

Comments:

30. We believe that the return of this data will facilitate a better understanding of the nature of participation in learning, and of patterns of travel-to-study. Accurate information of this type is an important ingredient in the evaluation of adequacy of existing provision in an area, and in planning for the future.

3.   The Council's proposal to ask all providers to return local learner and learning aim monitoring information in two fields of 12 characters, each of which is a multiple occurrence field, occurring twice (as described in 126) is supported

Disagree

Comments:

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31. LSDA believes that further consideration should be given to this proposal. We do not feel that it would be necessary or effective to encourage local LSCs to collect different and additional information at the local level, with no mechanisms in place for coordinating such data. Instead, we recommend that procedures be developed to enable local LSCs to propose new datasets for national collection. In addition, the Council could review the responses to this consultation, in association with the local LSCs, to identify any substantial support for the collection of data additional to that proposed elsewhere in the Circular and, if so, add the relevant field to the ILR.

Changes for WBL providers only

4. The Council's proposal to ask WBL providers to send data for all learning aims and not just the main learning aim (as described in paragraph 139) is supported

Agree

Comments:

32. LSDA supports this proposal as bringing about appropriate consistency with the arrangements that apply to FE providers, but notes the implications for an increase in the workload of WBL providers.

5. The Council's proposal to ask WBL providers to complete a disability field (as described in paragraph 140) is supported

Agree

Comments:

33. LSDA likewise supports this proposal as achieving consistency with the FE sector in ways that help to promote inclusive learning, in line with the recommendations of the Tomlinson Report. This step appears necessary if the same approach is to be taken to funding additional support across FE and WBL providers.

6. The Council's proposal to ask WBL providers to complete a country of domicile field (as described in paragraph 143) is supported

Agree

Comments:

34. LSDA supports this proposal as, once again, it furthers appropriate consistency with the arrangements that already apply to FE providers. The inclusion of the field will provide an incentive to WBL providers to check the eligibility of learners.

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7. The Council's proposal to ask WBL providers to complete an employer placement location postcode field (as described in paragraph 151) is supported

Disagree

Comments:

See comments on question 8 below.

8. The Council's proposal to ask WBL providers to complete a placement employer name field and a placement employer number field (as described in paragraph 152) is supported

Disagree

Comments:

35. LSDA believes that taken together, the proposals set out in 7 and 8 above are unnecessarily burdensome, and ought to be reviewed. Ideally, in the longer term the data needs in this area would be met by a national numbering scheme for employers (as noted in paragraph 151 of the Circular), the existence of which would require the use of only one field, rather than the three proposed. In the shorter term, we believe that the Council should consider whether its data needs fully justify the requirement to complete three fields of placement employer data.

Other comments:

36. LSDA believes that on balance the Council's proposals for data collection are appropriate to its remit. They also support the Agency's own research needs in the sector. As we have pointed out, though, taken overall they represent only a marginal reduction in the workload of FE providers, whilst adding significantly to the burden falling upon WBL providers. Any reduction that was feasible in the frequency with which returns were required from the latter group would therefore represent a welcome alleviation of the workload they would otherwise incur. In any case, many WBL providers are likely to require significant support, at least in the short-term, until their transition to the new arrangements is complete.

37. LSDA welcomes the Council's anticipation of an ILR based on 'extensible mark-up language (XML) format', thus rendering unnecessary the further use of multiple occurrence fields. We recommend that this is developed as quickly as possible.

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