

- stated and, as with all members of the boards and committees, applicants will need to demonstrate their capacity. All Learning and Skills Council board and committee members, locally and nationally, will require training to fulfil their roles adequately.
204. The limitations of skills forecasting also need to be acknowledged. Advice on newly emerging processes and products, and their likely impact on skills needs may be better obtained from suppliers of equipment, and large firms with research and development capacity. Securing this information will not be straightforward, because of commercial sensitivity and the multi-national nature of many large companies.
 205. We welcome the involvement of employers in skills forecasting, but arrangements need to recognise that the knowledge base that individual employers will be working from and their ability to accurately predict medium-to-long-term needs, particularly across a broad front, will be variable. They may be helpful in interpreting data, but this will also depend on their role in the company, their level of experience in such tasks, and the extent of their network with other employers.
 206. There is also a danger of placing too much reliance on 'local'. Given the capability of technology, place is less important, and the need for a sector approach may be more significant. It is therefore vital to have the NTOs advising on trends and range of skills and competencies required in particular sectors.
 207. The arrangements need also to recognise different degrees of match between learning programmes and skills needs, and the range of timescales involved. For example, it may be possible to obtain a near perfect match in upskilling programmes for the current workforce to meet skills of today. It will be less perfect for young people who will enter the workforce at a later date. It will be important, therefore, for information on long- and short-term needs to be shared across the 16–19 and adult learning committees.
 208. We recognise the difficulties outlined in the White Paper (see paragraph 8.14) about effective work with large national companies. The issue of who pays for the training needs careful consideration in this context. The principle of 'who benefits, pays' may be applied, but this is often difficult to determine. If large employers are contributing to the national 'stock' through their training, and the country as a whole gains, then giving firms public money for training their own staff may be appropriate.
 209. However, there is also a need to promote equity. A formula to determine the proportion paid by individuals, employers and the state could take into account the circumstances of individual employees. We would favour public funding being prioritised, for example, for initial foundation training rather than updating and upskilling. There is also a need to support individuals in some circumstances to prepare for progression to the next job. For low paid workers, the cost of developing skills in an area not related to current employment may be prohibitive, and a contribution from the current employer can not be a requirement.
 210. It is vital that the operation of the new framework does not introduce systems that discourage the development of a culture in companies to routinely allocate a percentage of their budget to training. We understand that the Skills Task Force is due to consider the possible role of a training levy. This could impact significantly on these issues.
 211. Current uncertainty about who pays for employee development is a disincentive to engagement with work-based education and training. We recommend that clear rules be established for funding of employee training, establishing the relative responsibilities of individuals, employers and the state for different areas of provision, in order to provide a clear framework for operation.

For further information on the issues discussed here, please contact Caroline Mager, Manager, Policy Unit, FEDA. Tel: 0207 840 5329 e-mail: cmager@feda.ac.uk

A black circle containing the text 'FEDA responds' in white, bold, sans-serif font.

**FEDA
responds**

Learning to Succeed: a new framework for post-16 learning

FEDA welcomes the proposals in *Learning to Succeed*. These provide the basis for a more coherent infrastructure from which to plan and fund post-16 learning, and to achieve the Government's vision of a modern economy and a skilled, engaged and creative workforce. We particularly support:

- the commitment to place the learner at the heart of the system
- the thrust towards widening participation in education and training
- the focus on meeting the needs of individuals, businesses and communities
- the prominence given to the needs of the economy and a systematic approach to meeting skill needs
- the separation of responsibilities for inspection from funding and the emphasis, in the remit of the Learning and Skills Council, on quality improvement
- the emphasis on information, advice and guidance to ensure that learners are empowered to benefit from the opportunities available.

To achieve the potential of the new sector, clarification is needed in a number of areas:

- Respective roles at local, regional and national levels need to be clear. We are concerned that there is a danger of duplication and overlap at the local level, and a strategic gap at the regional level.
- The approach to local planning must facilitate initiative and creativity and avoid a detailed annual planning cycle that constrains provider

capacity for responsive local engagement with individuals, communities and employers.

- The nature of the learning market and the extent to which it is to be founded on competition or collaboration is unclear in the White Paper. It must be recognised that collaborative approaches can be difficult when financial viability is at stake.
- In new arrangements, where funding will flow to public, private and voluntary providers, the role of public sector organisations should be explicit. The potential contribution of large not-for-profit organisations, such as colleges, as a resource to smaller local providers should be exploited.
- The proposed split in arrangements pre- and post-19 marks a fundamental change. This will create separate inspection, planning, curriculum structures, and information, advice and guidance systems. While this may offer benefits, such as new flexibility for adults through a united curriculum, and greater coherence pre-19, there is no rationale or evidence offered in the White Paper to support this significant policy shift.

Recommendations

Public service

- 1.** FEDA recommends that the Government clarifies the roles and functions of a public-sector service in the light of the objectives for the new framework and wider Government policy objectives for modern public services. (See paragraph 13.)

Encouraging demand

2. FEDA recommends that the Government seeks to influence and stimulate demand for learning through:
- the better supply of information, advice and guidance – labour market information (LMI) for learners – as suggested in the second report of the Skills Task Force
 - financial support for learners to turn demand into ‘effective demand’ – i.e. actual uptake
 - subsidies to encourage provision which meets wider social, as well as individual, objectives
 - individual learning accounts which can encourage the ‘learning ready’ to acquire and commit resources for learning. (See paragraph 17.)

Adults and young people

3. We recommend that research be carried out as a matter of urgency to identify benefits and disadvantages of joint or separate teaching for young people and adults in order to inform policy development in this area. (See paragraph 26.)
4. We recommend that a clear responsibility be established, with the national Learning and Skills Council, for securing effective liaison between the advice and guidance services for adults and young people. (See paragraph 74.)

Coherence with pre-16 learning

5. In order to ensure coherence between the work of the Learning and Skills Council and pre-16 learning we recommend that the following options be considered:
- joint working between the Learning and Skills Council and Qualifications and Curriculum Authority (QCA)
 - overview responsibility given to the Young People’s Learning Committee
 - a joint Learning and Skills Council–QCA committee established. (See paragraph 56.)
6. We recommend that the Learning and Skills Council be given powers to fund 14–16 provision outside the school environment, where appropriate, and that a clear budget be allocated for this work. (See paragraph 52.)

The Learning and Skills Council

7. We recommend early investment in briefings and development opportunities for members of the Learning and Skills Council in order that they develop an understanding of the whole post-16 sector. (See paragraph 67.)

8. We recommend that work is carried out in the run-up to the operation of the new learning and skills sector, to establish a viable system of data collection, monitoring and review which can operate nationally, while allowing data to be reported on a local and regional basis. (See paragraph 124.)
9. We recommend that the national learning targets be further developed to specify learner characteristics in order to reflect the Government’s objectives for social inclusion and widening participation. (See paragraph 81.)
10. We recommend that data on Employment Service-funded provision be collected in a format consistent with Learning and Skills Council data. (See paragraph 66.)
11. We recommend early publication of a report that sets out the anticipated range and types of providers and provision to be encompassed in the remit of the Learning and Skills Council. (See paragraph 50.)

Planning

12. We recommend that a national framework be established which sets out the baseline of provision to be available for learners in any part of the country. (See paragraph 30.)
13. We recommend that clear guidance be prepared on how to achieve the necessary alignment between the regional skills strategies of the regional development agencies (RDAs) and the annual statement of priorities of the local learning and skills councils operating within an RDA region. (See paragraph 33.)
14. We recommend that there be a clear articulation of the role of local learning partnerships in the planning process, and a requirement upon local learning and skills councils to take account of their proposals. (See paragraph 34.)
15. We recommend that the implications and applications of new technology for learning, together with the developing role of the University for Industry (Ufi), be kept under review in considering definitions of local patterns of provision and the mechanisms for planning. (See paragraph 35.)
16. We strongly recommend that the focus of the local learning and skills councils be on establishing strategic direction and priorities, rather than on detailed numerical planning of provision, leaving flexibility for providers and local learning partnerships to respond to local circumstances. (See paragraph 58.)

194. In the current and proposed arrangements, business people will now have opportunities to influence local education and training through:
- participation in NTOs
 - governorship of colleges and schools
 - membership of education–business partnerships
 - Participation in local learning partnerships
 - membership of local learning and skills councils.
195. This will provide extensive opportunities for business to exercise influence, but may present problems of capacity. Care will be needed to ensure that successful employer involvement is not achieved on the new local learning and skills councils at the expense of their involvement in existing successful schemes. Employers tend to train for advantage, not for ‘stock’, and will need to be convinced of the benefits to be derived from involvement in strategic planning for the general good rather than for their immediate needs.
196. We welcome the White Paper’s emphasis on the relationship between the development of individuals and business success. This link may not be apparent to some businesses, particularly SMEs not engaged in high-technology industries. There is a need for a concerted effort to ensure that businesses understand this connection, through the use of success stories demonstrating impact on the bottom line. FEEDA has evidence of this impact and would wish to support such an effort.
197. The Government should also promote the benefits of a learning culture in enabling firms to make rapid responses to skills and knowledge updating. This can be an effective means of combating skills gaps and shortages. LMI, as is currently provided, is not a good basis for determining skills needs. In a fast changing, knowledge-driven economy, predicting skills needs with any degree of accuracy will be very difficult. A balance between the development of specific and transferable skills is required.
198. The creation of a sound basis for employee development will also depend upon close working relationships at local level between the providers and customers of education and training. There is a need for direct long-term relationships between employers and providers, rather than intermediaries to secure a common understanding and a proactive approach to skills development. It is important that representational roles for employment interests are not seen as a substitute for provider/employer dialogue.
199. FEEDA has undertaken a significant amount of research into the contribution of the FE sector as stakeholder and strategic partner as well as service provider. There is a danger that the commitment of colleges to their local community could be diluted, or even lost, if they are viewed simply as another training provider. The extent of their involvement with employers, both directly, in forums, such as lifelong learning partnerships, and in project activity, through for example ADAPT ESF etc, is unlikely to be replicated by training providers, that are profit driven.
200. Attempts to engage employers in planning and delivery of education and training should also learn from past experience and recognise the difficulties. These include:
- the limited range and perspective of some employers, and possible conflicts of interests
 - while learning should be an essential component of successful businesses’ core purpose, training for stock is unlikely to be seen in the same way as training for their specific purposes
 - given the pressures of time on SMEs – quoted as a major reason for their lack of take-up of training – it is highly unlikely that they will be able to devote this precious resource to planning activities for the general good.
201. We recommend that:
- strategic alliances between FE colleges and employers, to develop a coherent human resources development strategy based on current and future skills requirements, encouraged by the Learning and Skills Council
 - SMEs are provided with evidence to support the view that training is an investment related to business success
 - Incentives for individuals and SMEs are provided to encourage them to invest in training and development.
- Do you support our proposals for the role of the Learning and Skills Council at national and local level in relation to skills and workforce development?**
202. We support the proposed role of the Learning and Skills Council locally and nationally in relation to skills and workforce development. It is vital that these arrangements maximise the efforts of the range of stakeholders and secure clear frameworks for their engagement. It is essential to ensure that the dialogue between employers and individuals and those charged with providing training and support is facilitated by the Learning and Skills Council, with an emphasis on securing direct interaction.
203. We also support the involvement of employers in the arrangements, with the provisos in paragraph 199 above. The description of their actual responsibilities in the Learning and Skills Council, at national and local level, will need to be clearly

- Youth Support Service/ConneXions and similar arrangements for quality assurance would assist this. (Also see paragraph 74.)
185. There are still concerns that the information and advice arrangements do not extend as far as offering individual guidance to adults, unless adults fall under special arrangements such as New Deal. The ConneXions (Youth Support Service) for young people will offer extended personal support but that will end at the age of 19. Given that employers and individuals will be expected to make a financial contribution alongside Government funding, FEDA would like to see individual guidance as well as training as an element of individual learning accounts. There is also a need for guidance to help learners to progress from basic skills and informal learning to more skills-based provision and qualification-bearing courses.
186. FEDA welcomes the decision that units of learning will be funded for adults. This will assist providers to offer more flexible programmes, tailored to specific needs. We believe this should provide the impetus for developing a credit framework for adults in order to promote progression. This would allow small bites of achievement to be accumulated over time. We note however the dangers of a divergence between the curriculum offer up to 19 and the opportunities available post-19. We believe that the needs of many excluded young people would in fact be more easily met through a unitised curriculum.
187. A priority will be to develop better measures to describe achievement – especially the outcomes of adult learning on courses which do not lead to qualifications, whether they are skills based, training at work or informal learning. It will be important that options are not polarised between national qualifications and non-award bearing provision. FEDA has published work that demonstrates approaches to describing learning outcomes on a range of adult learning opportunities. (Also see paragraphs 43–46.)
189. We recommend that unemployed people on benefit be entitled to full-time learning in a directly job-related area. This entitlement could be up to a competency level suited for entry to the job area (i.e. level two). This could encourage unemployed people to develop skills to obtain and sustain work.
190. For those with multiple problems (from families with a history of unemployment, who have been homeless for over a year, with some form of addiction, etc.), full-time non-job-related learning on benefit for at least a year needs to be considered. For a large number of such unemployed individuals, confidence-building and personal empowerment are needed to enable them to make individual choices. This improves their ability to make maximum use of their future learning opportunities and thereby improve on their employment chances.
191. Some unemployed people face barriers of prejudice, especially with regard to race/ethnicity. There is the need for monitoring to be instituted especially where the employers are publicly owned and/or supported or are delivering public contracts. Whilst this is not a learning issue, it has learning implications. There is evidence that in communities where educationally qualified people are unemployed or are in marginal jobs or are on comparatively low remuneration, the demand for learning, especially among the young unemployed is generally low. Therefore low patterns of expectation are established.
192. There should be an entitlement to on-going advice and guidance on learning and job opportunities for all unemployed. We believe that the new adult guidance service under the Learning and Skills Council should improve the opportunities available. We recommend (see paragraph 31) that Employment Service provision be brought within the remit of the Learning and Skills Council in order to bring greater coherence to education and training opportunities.

What more should we do to ensure we develop coherent provision for unemployed people to gain the skills they need to tackle the other barriers they face in finding and keeping work?

188. The proposals attempt to simplify the arrangements regarding access to education and training for the unemployed and FEDA welcomes this intention. We also support the aim of promoting employment as a route out of social exclusion. However, the implication that benefit is not intended for those who are learning is not helpful in encouraging people wishing to improve their prospects for employment.

Chapter 8. Encouraging learning businesses

Are the measures proposed sufficient to engage business in the new arrangements?

193. We recognise that it is vital to the economy that education and training provision responds to the needs of local and national business and sector needs. The representation of employment interests at board level of the local and national learning and skills councils indicates the seriousness of the Government's intention. We note the emphasis on improving labour market information systems, and recognise the pivotal role of NTOs. (Also see paragraphs 62–64.)

Funding

- 17.** We recommend that local variation of funding should be kept at a level that allows specific needs to be met without creating great discrepancies in the provision available nationally. (See paragraph 95.)
- 18.** We recommend that the discretionary budgets managed by local learning and skills councils be used to respond to significant changes in the local employment context such as plant closures or new inward investment opportunities. We also recommend that a bidding system for funding should be avoided if possible since this can be time-consuming and inefficient. (See paragraph 39.)
- 19.** We recommend that specific criteria be drawn up nationally to identify the range of local priorities and circumstances for which local discretionary funding can be used. (See paragraph 94.)
- 20.** We recommend that decisions on what provision should be funded at public expense continue to promote recognition of learner achievement and progression, and that work be carried out to develop approaches to recognising achievement that falls outside qualifications. (See paragraph 46.)
- Supporting people with special needs**
- 21.** We recommend that in planning for adults, the continuing needs of young people and older adults with disabilities and learning difficulties for full-time education post-19 be considered. (See paragraph 27.)
- 22.** We recommend the adoption of the principle of entitlement to ensure that all learners, irrespective of the nature or extent of their disabilities, are entitled to access to learning on an equitable basis to those who have clearly definable employment or qualification outcomes. (See paragraph 110.)
- 23.** We recommend that the Learning and Skills Council adopts the additional-support funding mechanism currently applied by FEFC, with minor alterations. (See paragraph 111.)
- 24.** We recommend that the Disability Discrimination Act be amended to include all forms of post-school education and training. (See paragraph 114.)
- 25.** We recommend that all providers of education and training be required to produce disability statements and to update them annually. (See paragraph 115.)
- 26.** We recommend that specialist residential provision that is a national resource be incorporated within planning and funding at local and regional levels. (See paragraph 116.)
- 27.** We recommend that the Learning and Skills Councils fund placements at specialist colleges on the basis of recommendations arising from the transition planning process and should require formal assessment at a mainstream provider only where this represents a realistic option. (See paragraph 119.)
- Improving quality**
- 28.** We recommend that the creation of a common framework for inspection be taken as an opportunity to identify the best elements of the existing frameworks and to apply these more widely. (See paragraphs 20 and 132.)
- 29.** We recommend that the new inspection framework:
- be based principally on assessment of observed teaching and learning
 - be evidence-based
 - use benchmarking
 - employ a grading system as a means of assessing different aspects of provision, monitoring progress and supporting quality improvement
 - include both subject-focused and programme-area inspection. (See paragraph 134.)
- 30.** We recommend that work be urgently started to develop a better and wider understanding, ownership and common use of performance indicators. (See paragraph 136.)
- 31.** We recommend the establishment of a professional institute for post-16 education/training staff to assist the monitoring of continuing professional development activity and help raise professional standards within the sector. (See paragraph 141.)
- 32.** FEDA recommends that benchmarking be adopted as an important means of driving up quality. (See paragraph 144.)
- Supporting unemployed people**
- 33.** We recommend that unemployed people on benefit be entitled to full-time learning in a directly job-related area. (See paragraph 188.)
- Encouraging learning businesses**
- 34.** We recommend that the needs of the labour market are determined through an interactive process, based on intelligence gathered from a range of retrospective, current and forward-looking sources of information. (See paragraph 65.)

35. We recommend that:

- strategic alliances between FE colleges and employers, to develop a coherent human resources development strategy based on current and future skills requirement, be encouraged by the Learning and Skills Council
- small and medium-sized enterprises (SMEs) are provided with evidence to support the view that training is an investment related to business success
- incentives for individuals and SMEs are provided to encourage them to invest in training and development. (See paragraph 200.)

36. We recommend that clear rules be established for the funding of employee training, establishing the relative responsibilities of individuals, employers and the state for different areas of provision, in order to provide a clear framework for operation. (See paragraph 210.)

FEDA responds to chapters from *Learning to Succeed: a new framework for post-16 learning*

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Introduction

1. FEDA supports the Government's aim to:

build a new culture of learning and aspiration to underpin national competitiveness and personal prosperity, encourage creativity and innovation and help build a more cohesive society.
2. We believe that bringing together education and training provision, and adult and community provision, under a single system of funding and planning is an important step towards a more coherent and responsive system. It should provide a more secure basis from which to enhance the skills, engagement and creativity of the population and to make a successful transition to the knowledge-and-information economy.
3. FEDA welcomes the Secretary of State's commitment to place the learner at the heart of the system. The emphasis given to information, guidance and advice should ensure that learners are empowered to make the most of the opportunities available.
4. We support the focus on meeting the needs of individuals, businesses and communities and the importance placed on employment as a key means of addressing social exclusion. The engagement of employers at strategic and operational levels within the new sector should secure an effective dialogue to ensure that the needs of employment are supported through education and training provision.
5. We strongly support the thrust towards widening participation in education and training. The following proposals will support this policy objective:
 - a more coherent system underpinned by more effective information, advice and guidance should help bring in learners who currently find it difficult to access education
 - the committees of the Learning and Skills Council have explicit responsibility for increasing participation and retention, and promoting excellence, social inclusion and equality of opportunity
 - the local learning and skills councils have a clear role in putting forward proposals for widening access and in developing local strategies for skills.
6. Together with the strong local focus of the arrangements to provide local communities with the power to shape provision to meet their needs, we believe the new arrangements have the potential to transform the provision for

young people even further, result in making it even more difficult to include the most recalcitrant and, perhaps what is most important, contribute nothing to the concept of lifelong learning.

Staffing and professional formation

Question 5. How best do you think the mix of skills needed to deliver the new service can be developed in the short and longer term (paragraph 10.17)?

173. The mix of skills required could be achieved through professional development for existing staff, building on their skills and adding additional skills. A professional qualification might be constructed from a mix of the competences approved for youth and community workers and the NVQs on advice and guidance.
174. In the short term, and to overcome cultural differences, staff from the careers service could be involved in secondments to the youth service and *vice versa*. Similar arrangements could operate for college staff, youth trainers and others in key worker roles in voluntary organisations.
175. Development of peer mentoring involving young people as support workers, would suggest that in-service training will be most appropriate.

Implementation

Question 6. What do you consider to be the key issues for the implementation phase?

176. FEDA supports the proposal for working groups to take forward plans for implementation in four main strands.
177. There is a need for very close links between group A (learning products and delivery) and group B (graduation); i.e. on participation and achievement. Development of the progress file could provide a link.
178. There appears to be no group looking at tracking, which is very complex with young people. This makes multiple transitions and hard-to-reach (e.g. homeless) young people especially difficult to track – snapshot targets of participation and achievement do not capture this. This may be work that group C could undertake.
179. There are many positive ways in which FEDA could contribute effectively to the provision of such a service, especially given the very tight timescale for its introduction. FEDA has published with DfEE a guide to supporting disengaged young people *Further education: giving young people a new start*, and recently undertook an evaluation of colleges' role in New Start and how they could support the Learning Gateway. FEDA has also produced several pieces of research on transition and guidance.

Chapter 7. Supporting adult learners

Question 7. In what further ways can the Learning and Skills Council best deliver improvements in adult learning?

180. FEDA warmly welcomes the emphasis on the learning needs of adults in the new arrangements for post-school education. It is helpful to see that the role of colleges in providing adult learning is noted, but there is insufficient acknowledgement that they are by far the largest providers of adult learning (81% of FE students are adults). This is not just for second-chance education, but also for technical and professional updating, access to HE courses and higher education itself, and short courses in areas like information technology and training for employers. Adult learners take twice as many qualifications as 16–19s (3.8 million qualifications compared to 1.9 million taken by young people).
181. It is helpful that the local learning and skills councils will have responsibility for ensuring adequate provision and the funding to do this. Legislation to underline the continuing role of LEAs in securing adult education is important, but the roles of both parties needs to be clearly articulated. The flexibility of local learning and skills councils to tailor funding to local needs is welcomed; for example, targeted funds in areas where there are particular skills deficits or to particular under-achieving groups, such as some ethnic minorities.
182. It is also important that where local authorities have well-established adult education provision, their funding is not reduced by dividing the funds nationally; in other words, there needs to be an increase of the total amount spent on adult learning. Responsibilities for planning provision (between the RDAs, learning partnerships and the Learning and Skills Councils) will need to be clarified further.
183. The commitment to support Learning Direct is essential; it has the potential to become a key information source and play an important part in raising awareness of opportunities. However, we believe it would be sensible for it to be funded through the Learning and Skills Council, to enable the Learning and Skills Council to have a coherent strategy to promote adult learning and manage local services, in order to provide the 'seamless service' proposed in paragraph 7.23.
184. FEDA welcomes the new arrangements for adults to gain information and advice and it makes sense for these services to come under the aegis of the Learning and Skills Councils from 2001 (see paragraph 7.24). There will need to be close cooperation with the arrangements for the

and continuous. Rapport will be essential if it is to be of real benefit. Therefore, it is essential to have the right kind of people in place. Lessons should be drawn from the experience of the Learning Gateway.

162. The report does not mention initial assessment and diagnosis. These provide the basis for advice and guidance, especially in the early stages of development of flexible approaches and individual achievement profiling. We recommend that this is an identified responsibility.
163. Advocacy on behalf of the student is not explicitly included. This is an important competence identified as part of the role of advice and guidance workers (e.g. by the lead body and NVQs). Developing self-advocacy skills and other skills and confidence so that the young person moves towards growing independence should also be part of the function of the service, which from the description seems to imply a dependency model.

Monitoring provision

164. The agency should have a role in mapping whether there is sufficient provision (especially informal and innovative provision, but also employment, education and training and special projects) to meet the needs of the most vulnerable non-participants.
165. It is important that this new service does not merely serve the *status quo*. There are changes that are needed in the system, especially around flexibility and choice pre- and post-16 that can potentially play a vital role in promoting the 'staying in learning' culture. Thus identification and monitoring progress of at-risk learners, needs to be accompanied by a broader, more strategic consideration of learner provision and benchmark standards of flexibility, especially in the 13–16 phase, but ideally viewed across the 13–19 continuum.

Institutional arrangements

Question 2. What is your view of the respective merits of the options for local delivery set out (in paragraph 10.10)?

Question 3. Among existing services, which do you think should be absorbed into the core Youth Support Service, and which do you think would function more effectively as partners or contractors?

166. FEDA supports the proposal for a national agency to oversee the work and agrees that not all employees need to be directly employed by the agency. One agency body contracting per area would be preferable to a loose partnership; however, to avoid duplication or piecemeal opportunities there should be a statutory requirement to work with a range of agencies

and for them to provide information to the Youth Support Service. Common service standards would encourage close cooperation and a better service to clients.

Right to time off for study

167. Awareness raising with employers about right to time off may not be sufficient. The service may have the responsibility to monitor at a local level the utilisation by employers of this right not only at the vacancy stage but also through practical implementation. Although not mentioned, this monitoring will also potentially cover young people involved in work-based training through Modern Apprenticeships and National Traineeships.
168. A body with responsibility for 13–19 learning could contribute to the development of innovation and full exploitation of opportunities available and ensure coherence along the 13–19 continuum. Our work shows the need for:
- partnership development
 - working at individual-learner level for profile development
 - whole-cohort approaches to raise parity of esteem for work-related learning opportunities
 - wider recognition of activities undertaken
 - joint staff development and sharing cross-institutions.

Targets

Question 4. What is your view of the approach suggested to targets for the new service?

Outcome targets

169. FEDA strongly supports specific targets for underachieving groups. Additional targets could relate to young people leaving the area (the particularly mobile population of young people who have left care or those in youth custody).

Process targets

170. We support targets based on knowledge of clients and on the percentage in education and or training. Figures should also be collected for those at work. It is not clear whether the targets of participation leading to 'at least level two' is any level-two qualification or graduation. This will need to be clarified.
171. There should also be targets for the agency for securing sufficient provision in the locality that meet the criteria in annexe E (what works in engaging and retaining 16–18-year-olds in work-based training) or similar principles.
172. There is a clear need for a top-down/bottom-up iterative approach to setting and monitoring targets. Otherwise there is the danger that top/bottom will merely result in young people being shoe-horned into options to achieve national targets. This would serve to alienate

individuals, business and the community. FEDA is committed to work with partners to realise this potential.

Issues for further analysis

Competition or collaboration

7. There is a tension running through the White Paper in relation to the Government's intention to create both a 'fair and competitive market' (paragraph 3.23), 'collaborative action at the local level' and 'coordination of efforts' (paragraph 3.28). The White Paper does not present a single, clear vision of the new framework, or the nature of the relationships that it expects to be developed between providers in the new system.
8. There is a danger that the greater number of providers will compete for more cost-effective areas of provision. Public-sector providers may be left with responsibility for 'welfare' provision for which the private market does not wish to compete. In addition, collaboration can be at odds with competition where financial viability is at stake. The maintenance of a public-sector education and training infrastructure is essential to secure the stability that an inclusive and responsive education and training system requires.
9. The model for the new learning market needs further clarification. We recognise the commitment in the *Modernising Government* White Paper to a blurring of public and private sector and to more client-centred public services. However, the precise operation of the learning and skills sector requires further analysis. FEDA is carrying out work with Institute for Public Policy Research (IPPR) to explore how a market model could effectively operate to meet the objectives of the new arrangements.

The role of colleges and the public sector

10. Funding will flow to a wide range of providers, including private training providers, adult, community and voluntary-sector providers, as well as colleges, that will be of varied capacity, range and size.
11. Within this context, the role of large public-sector providers such as colleges needs to be clear. Institutions with multi-million pound budgets and experience with thousands of students will have the capacity to make a different contribution to the new framework compared to smaller niche providers. Colleges could, in a collaborative system, provide a focus and resource for professional development, curriculum innovation and management information systems to support the range of smaller providers, whether public, private or voluntary. The White Paper does not

indicate such a role for colleges, and does not indicate that public-sector providers have a particular or distinctive role.

12. There are clear differences between public-sector colleges and private-sector trainers in current arrangements, which need to be acknowledged and inform future arrangements. These include legal and financial differences. A college owns its assets *protem* in a stewardship role and has to account for the safeguarding of those assets in addition to meeting its contractual obligations to FEFC. A private provider, on the other hand, owns assets unconditionally and merely has to meet contractual obligations – it has none of the constraints or costs associated with stewardship.
13. The Government should either identify a clear role for public-sector providers such as colleges, or remove current discrepancies to establish a fair and competitive market. FEDA recommends that the Government clarifies the roles and functions of a public-sector service in the light of the objectives for the new framework and wider Government policy objectives for modern public services.

Demand-led or needs-led

14. FEDA agrees that a funding methodology that is primarily demand driven represents the most effective way of engaging providers. It has been shown to be more cost effective than centrally planned systems. It harnesses the energy and creativity of providers to the task of matching provision closely to local circumstances and encourages maximum responsiveness to change.
15. There is, however, a need for Government to take further action to stimulate and encourage demand in areas where it might be deficient. We suggest that this is likely to include the following areas:
 - provision for the disadvantaged who may lack both the resources and the confidence to engage with learning
 - provision to meet emerging or longer-term needs of the labour market of which individuals may yet be unaware
 - circumstances in which the interests of individuals or firms do not wholly align with those of the wider community (e.g. transferable qualifications may not be of interest to employers).
16. We feel that the mechanisms used to address these deficiencies should be consistent with the Government's overall approach. Rather than seeking to direct providers the emphasis should be on encouraging demand.

17. We recommend that the Government seek to influence and stimulate demand for learning through:

- the better supply of information, advice and guidance – labour market information (LMI) for learners – as suggested in the second report of the Skills Task Force
- financial support for learners to turn demand into ‘effective demand’ – i.e. actual uptake
- subsidies to encourage provision which meets wider social as well as individual objectives
- individual learning accounts which can encourage the ‘learning ready’ to acquire and commit resources for learning.

Inspection and quality

18. We welcome the clear distinction between inspection and quality-improvement roles. Inspectorates will have a clear external quality-audit role; the Learning and Skills Council will be responsible for quality improvement. We welcome the requirement placed on the Learning and Skills Council to establish a quality-improvement strategy for the whole sector. This will build on the strong culture of self-assessment established by the FEFC and the Training and Standards Council (TSC).

19. We support the proposal that the capacity for intervention be applied in inverse proportion to success. However, a differentiated system of intervention will require sophisticated and reliable information and monitoring systems in order to operate effectively.

20. We recommend that the creation of a common framework for inspection should be taken as an opportunity to identify the best elements of the existing frameworks and to apply these more widely. The new framework should have as its central focus the quality of the learning experience. In addition it should:

- be evidence-based
- use benchmarking
- employ a grading system as a means of assessing different aspects of provision and monitoring progress
- include subject-focused inspection.

See our response to chapter 5 (page 16) for further detail on quality improvement.

21. Funding will flow on the same basis to a range of public-, private- and voluntary-sector providers, provided that these meet ‘essential quality and accountability thresholds’. Clear specification of these thresholds will be essential, and will be influential in defining the shape of the new sector. It will be essential that quality standards are high, and that data, along the lines of the individual

student record, is provided to account for all public funding.

Adults and young people

22. The following proposals point to more distinctive arrangements for young people up to 19, and adults over 19:

- separate committees of the Learning and Skills Council for young people and for adults with indicative budgets set by the Secretary of State
- separate information, advice and guidance systems
- separate inspectorates
- potential for distinctive provision, with 16–19-year-olds working towards graduation, and adults following more unit-based programmes.

23. We recognise that these proposals might lead to greater flexibility in the curriculum offer available to adults, making it easier for providers to meet more precisely individual, community and business needs. We also recognise that the proposals could bring increased coherence to provision for 14–19-year-olds.

24. However, much provision in colleges involves young people and adults being taught in mixed groups. These arrangements may be the result of a positive decision and a view that there are real benefits for young people in particular. They are also likely to be the most cost-effective arrangements. Many practitioners speak positively about the benefits of mixed-age teaching, particularly for young people who seek a more adult environment.

25. There is a lack of research evidence on which to base a policy shift in favour of either greater integration or greater separation of provision for young people and adults. The White Paper offers no analysis of current provision to offer a rationale for the proposed changes, yet these could mark a very significant shift in the way that post-16 learning is delivered. Such significant changes should only be carried forward on the basis of clear evidence.

26. We recommend that research be carried out as a matter of urgency to identify benefits and disadvantages of joint or separate teaching for young people and adults in order to inform policy development in this area.

27. The division between 16–19 and adult provision is potentially damaging to people with learning disabilities and difficulties. Many young people do not leave school until 19. Only at that stage do they achieve sufficient maturity to benefit from further education or learning. We recommend

to move beyond a ‘carrot and stick’ approach, rewarding achievement and avoiding ‘perverse incentives’.

- Achievement, progression and qualifications: in relation to lifelong learning and social exclusion, it is important that achievement is stressed as strongly as participation. It is crucial to focus on progression to employment and higher qualifications in driving up quality. FEDA recommends a drive on quality at entry level, levels one and two, aiming to increase the numbers who progress to and succeed at level three.
- Self-critical improving culture: more work is needed to build on FEDA’s development work in this area. Without such a culture no amount of measurement will lead to improvement.

The need for immediate action

149. Whilst the focus for long-term quality improvement will be on the new learning and skills sector after April 2001, FEDA believes it is imperative that work begins now, across all providers, to establish an accurate picture of quality standards across the new post-16 framework. Achieving an accurate picture of quality standards arrangements and issues will provide vital baseline data for quality improvement across the new sector. This cross-fertilisation of good practice will be the quality dividend for a unified, but highly diverse post-16 sector.

Chapter 6. Education and training of young people

150. The White Paper did not ask specific questions related to young people, but referred to the imminent report from the Social Exclusion Unit. The following extract from FEDA’s response to that report *Bridging the gap* addresses the operation of the Youth Support Service.

Youth Support Service

151. The analysis of the current situation understates the role of colleges in supporting 14–19-year-olds who have opted out or been excluded from school. The report appears to assume (see paragraph 10.1) that those who remain in schools are appropriately dealt with in terms of curriculum choice, personal guidance and support. This is not necessarily the case.
152. We welcome the proposals and set out below our responses to the specific questions raised.

Functions

Question 1. Are the proposed functions of the new service correctly specified? Are there other functions it should also undertake? Are there any functions listed it should not undertake?

153. FEDA strongly supports the proposal for a Youth Support Service and personal advisers; in general, the functions seem to be appropriately specified. However, there are additional functions that are important if the measures are to improve access and opportunities to excluded groups.
154. The model of personal support suggests that the problem only lies with the young person, whereas the preceding analysis in the report also demonstrates that there is institutional inadequacy and an inequitable range of appropriate opportunities around the country.
155. The learning support service proposed in *Learning to Succeed* is for all students, so targeted action is essential to meet the needs of socially excluded non-participants and ensure that support is in direct proportion to need. The entitlement for all young people to advice and guidance, and the role of careers education and personal and social education (PSE) in schools and colleges need to be emphasised.
156. We therefore propose the following additional areas should be addressed.

Data gathering

157. Gathering and making sense of statistical data will be a vitally important and daunting task and needs a standardised approach. Development of an individual learning record may be a way forward. Consistent and complete data would be facilitated if responsibility and accountability for all 13–19-year-old learners were under the auspices of one body. Our response to *Learning to Succeed* points out the difficulties of having responsibility split between QCA (National Curriculum), and the Learning and Skills Council (work-related learning) for the 14–16 age group. A clear responsibility for data resting with the Youth Support Service should be considered as an option.
158. Our research has shown that it is far easier to contact and log the pathways of those disengaged young people who are below 16 as there are statutory requirements for record-keeping. This is not the case after the age of 16 and it is therefore easier for them to slip out of the system.
159. Students’ experience of work as well as their educational history should be recorded.
160. To ensure the services reach those most in need of support, it will be important to record data on, for example, ethnicity. Progress of different disadvantaged groups will need to be mapped to see if the support mitigates against any of the difficulties or discrimination they may face.

Personal advisers

161. Personal advisers need to provide more than a point of contact. The role needs to be supportive

- percentage of teachers/trainers in possession of initial teacher-training qualifications endorsed by the Further Education National Training Organisation (FENTO)/ENTO
- percentage of managers in possession of FENTO endorsed management qualifications, and percentage who possess the principal's qualification (planned for 2002)
- percentage of governors who have received formal training sponsored through the Standards Fund.

Continuous improvement

138. A raft of measures is needed to ensure continuous improvement:

- publication of performance data against agreed, relevant key performance indicators
- internal self-assessment on an annual basis
- trend analysis over three-year periods
- external inspection
- post-assessment action planning
- target setting and systematic monitoring
- incentives for improving standards.

Continuing professional development

139. FEDA welcomes the Government's proposals for required training for new teachers, principals and governors. We strongly support the role of FENTO and value close engagement with its work.

140. In many professions a requirement exists for practitioners to 'remain in good standing' through the completion of a required number of training days per year, or the acquisition of a number of professional-development points achieved through attendance at conferences, courses or other work-based activity. The introduction of an annual requirement to remain in good standing for teachers, trainers and managers would be an important step in improving the performance of staff in the sector.

141. We recommend the establishment of a professional institute for post-16 education/training staff to assist the monitoring of continuing professional development activity and help raise professional standards within the sector.

Recognising success

142. Success could be measured by:

- the extent to which targets are met (i.e. national targets, and targets at regional, local and provider levels)
- the extent to which measurable improvement is evident.

Benchmarking for improvement

143. The emphasis on meeting customer and stakeholder needs in education in the White Paper is welcome. It means that learning providers must continuously improve to maintain the level

of service provided. As a result, providers need to use the full range of tools available to them to keep pace with ever-changing requirements.

144. FEDA recommends that benchmarking be adopted as an important means of driving up quality. Benchmarking moves beyond league tables of performance, surveys and comparing performances. Comparison must lead to improvement. It moves beyond re-engineering processes: although benchmarking means examining an organisation's own processes, it involves learning from others' improvements and mistakes with a clear purpose. FEDA's view is that benchmarking can motivate learning providers to improve in ways which league tables and comparative statistics alone cannot.

145. Benchmarking will help all providers, stakeholders and other organisations in the new sector to understand their processes and customers' needs fully and to take action for improvement.

Value added

146. FEDA recognises from its own research the technical difficulties in configuring systems for measuring value added GCSE to A-level. However, we believe that, as a priority, value-added approaches should be developed to tackle other qualifications and learning achievements. Adults in particular come with a wide variety of educational attainments and competencies and often study part-time and episodically. We believe that a high-level commitment and investment is needed to address the issue of how to measure distance travelled.

Effectiveness and failure

147. We have begun to understand, through research conducted by FEDA and others, what constitutes an effective college. We need to know more about effectiveness in training provision and more informal, non-institutional learning.

148. We know far less about what causes institutional failure. Clear definitions of failure are required, and a clear analysis in order to systematically and appropriately address issues at sector level, provider level and within organisations. Research is needed, as are policy measures to reward success and penalise failure.

Development priorities

- Further research is needed into some key areas to inform quality improvement. These include: differential achievement, retention of part-time students and underachieving social groups.
- Funding: further work is needed on the development of incentives which are carefully designed and deliberately applied. We need

that in planning for adult provision, the continuing needs of young people and older adults with disabilities and learning difficulties for full-time education post-19 be considered.

28. It will be particularly important to ensure liaison and continuity between the advice and guidance function for young people and adults to avoid fractures in the support systems for customers. (Also see paragraph 74.)

A national framework

29. We support the focus in the White Paper on creating a single national system. A major benefit of bringing together learning and skills provision under one set of planning and funding arrangements is to create a consistent and national system with equal access to opportunities across the country. A national tariff will help ensure that the resources for learners are based on need rather than where they live or what funding stream they come under. The White Paper is very clear on this point. There is, however, an equal need for a common baseline for what is offered. This will need to address issues of what should be realistically available locally or regionally, and will need to be subject to review. In order to secure this, an early task of the Learning and Skills Council should be to define and secure this common national baseline of opportunities.
30. We recommend that a national framework be established which sets out the baseline of provision to be available for learners in any part of the country.
31. We support the goal of a common framework for post-16 learning. We believe that, in the short term, Employment Service provision and prison education should also be encompassed. In addition, local planning arrangements must encompass the capacity and contribution that higher education can offer to a local community. We note that in Wales, there are clear moves towards common systems, including higher education.

Local planning arrangements

32. There is a danger of overlap and duplication at the local level, and of a strategic gap at the regional level. Clear mechanisms with articulation of planning timescales will be needed to manage the planning process between local and regional bodies and to secure a fit with the skills agenda. It is not economical for all provision to be locally available. Certain specialist provision should continue to be regionally based.
33. We recommend that clear guidance be prepared on how to achieve the necessary alignment between the regional skills strategies of the RDAs and the annual statement of priorities

of the local learning and skills councils operating within an RDA region.

34. The relationship between local learning partnerships and local learning and skills councils is causing concern in the field. In particular there is concern that the influence of local partnerships will be undermined by the creation of very powerful statutory bodies also operating at local level. We recommend that there be a clear articulation of the role of local learning partnerships in the planning process, and a requirement upon local learning and skills councils to take account of their proposals.
35. While acknowledging the need for local community responsiveness, arrangements must not endeavour to prevent the inevitable demand for more distributed and distance learning within a global learning economy. It will not be realistic to expect that modern providers be geographically constrained in offering learning opportunities. We recommend that the implications and applications of new technology for learning, together with the developing role of the Ufl, be kept under review in considering definitions of local patterns of provision, and the mechanism for planning.

Funding mechanisms

36. The new system will bring together:
- the purchasing system operated by TECs
 - the tariff-based grant-funding system deployed by the FEFC
 - non-tariff-based grant-funding for adult and community provision through local authorities.
37. We support the flexibility and cost-effectiveness that can be achieved through a tariff funding system, but believe that additional mechanisms are needed to address some specific skill needs. A tariff system responding to learner preference may not deliver specific skills needed for economic success. More direct market intervention may be required and might include purchasing of specific provision, or the creation of demand, for example through ILAs. In addition, capital funds to enable investment in advance of demand may be necessary to meet future needs. This should be in designated skill areas where the market has failed to respond adequately. (Also see paragraphs 14–16.)
38. The plans for these specific interventions should be approved locally by the local learning and skills councils, but provision should be purchased nationally, direct with providers. The use of local discretionary budgets to meet skill gaps could lead to confusion about what is already funded through the tariff-based grant.

39. We recommend that the discretionary budgets managed by local learning and skills councils be used to respond to significant changes in the local employment context such as plant closures or new inward investment opportunities. We also recommend that a bidding system for funding be avoided if possible since this can be time-consuming and inefficient.
40. It will be important that budgets for quality improvement and standards are separate from budgets for funding or purchasing of provision. As the new learning and skills sector develops there will be a need for systematic quality improvement through targeted funding, separate from the primary distributive mechanisms of the Learning and Skills Council.

Meeting the skills agenda

41. We support the requirement to ensure that the learning and skills sector meets the current needs of business and the future needs of the economy. Our response to chapter 8 (page 22) highlights from our experience the challenges to securing effective employer engagement. We caution against reliance on a model of employer representation. Establishment of on-going dialogue between employers and providers can be a secure basis for meeting and anticipating employee development needs. We believe that this must be valued alongside detailed labour-market planning information, which has limitations.
42. The White Paper places disproportionate emphasis on basic skills compared to higher-level skills required for the knowledge-driven economy. A balanced assessment of the importance of basic skills and intermediate- and high-level skills needs to inform the planning and funding approaches adopted by the new Learning and Skills Council.

Funding learning

43. Drawing together diverse provision under one planning and funding system could remove the constraints on the range of provision that can be funded. These have created difficulties for colleges and the removal of the divide is welcome. Schedule two causes difficulties for providers in meeting the needs of learners for whom progression is not a realistic option. More recently, rationalisation of qualifications recognised under aspects of the schedule has caused concerns about the range of fundable provision.
44. The inclusion of a broader range of provision within the ambit of the Learning and Skills Council is therefore welcome. However, decisions will still be needed about what should be funded at public expense, and these decisions will shape the range of provision that will be offered.

45. Care will be needed to avoid a polarisation between learning that leads to national qualifications, and learning that leads to no recognised award. We acknowledge that the emphasis in schedule two on gaining recognised qualifications and upon progression has led to difficulties for providers. However, they have also promoted formal recognition for achievement which learners can then use as the basis for further learning.
46. We recommend that decisions on what provision should be funded at public expense continue to promote recognition of learner achievement and progression, and that work be carried out to develop approaches to recognising achievement that falls outside qualifications.

Implementation

47. We welcome the publication of the implementation plan and the update posted on the website. Regular information will be essential to maintain stability and avoid planning blight.
48. In addition to the areas of work identified in the plan, we suggest that work is needed to scope the new sector. Currently there is a lack of clear information about the range of providers, provision and learners that are likely to be encompassed under the auspices of the Learning and Skills Council. For example, data about the numbers of staff, their roles and qualifications across the range of providers should be compiled. This could be of value to the inspectorates, to the Learning and Skills Council in its quality-improvement role, and to bodies like FEDA who promote quality delivery.
49. Such an 'atlas' of the new sector will assist providers to understand and locate themselves within new arrangements. The scale of the proposed changes is very significant and the level of support required will be extensive.
50. We recommend early publication of a report that sets out the anticipated range and types of providers and provision to be encompassed in the remit of the Learning and Skills Council.

Responses to specific consultation questions Chapter 3. The Learning and Skills Council

What more might we do to ensure coherence between the work of the Learning and Skills Council and pre-16 learning?

51. We welcome the creation of the Young People's Learning Committee which will be the key policy and strategic body for pre-19 learners, and support

130. FEDA welcomes the central role of quality and standards in *Learning to Succeed*, and the incorporation of quality improvement in the remit of the Learning and Skills Council.
131. We particularly welcome the clear distinction between inspection and quality improvement. We believe that it is right that inspection (the assessment of quality) is reconfirmed as an objective external exercise. FEDA's view is that quality improvement is appropriately led by the funding body and carried out by providers, operating autonomously and building on all the mechanisms for self-assessment and the development of an improvement culture which have been successfully developed by FEFC as part of their inspection frameworks.
132. We support the creation of a common framework for inspection, with agreed standards. We recommend that the creation of a common framework for inspection be taken as an opportunity to identify the best elements of the existing frameworks and to apply these more widely. However, a single framework must avoid rigidity. It must be flexible and capable of adjustment to ensure an accurate and informed assessment of the quality of pedagogies which are appropriate to an increasingly wide range of needs, settings, modes of delivery and learning technologies.
133. The quality of the learning experience, and the achievement and progression of all learners must be at the centre of inspection. Inspection should be based first and foremost on the assessment of observed teaching and learning. This is the key evidence of the quality of provision, with systems and structures as important supporting information. This information should focus primarily on retention, achievement and progression.
134. We recommend that the new inspection framework should:
- be based principally on assessment of observed teaching and learning
 - be evidence-based
 - use benchmarking
 - employ a grading systems as a means of assessing different aspects of provision, monitoring progress and supporting quality improvement
 - include both subject-focused and programme-area inspection.
- Defining quality**
135. FEDA believes that the Government's proposals provide a unique opportunity to define quality, in order to provide a clear focus for a long-term drive in a new and diverse sector. We suggest that a clear definition of quality be established predicated on:
- a positive and effective experience for learners
 - wider participation by all social and ethnic groups. Social inclusion should be a fundamental element of the quality-improvement agenda
 - improved levels of retention, completion and achievement for learners wherever they study
 - improved responsiveness by providers to long and short-term skills shortages/requirements in the local and national economy. This would be aided by a clear remit for local learning partnerships to maximise the effectiveness of the local Learning and Skills Council's planning role
 - a post-16 education service which is continuously modernising and updating its delivery, is innovative in the development of learning opportunities and offers appropriate technology to support learning
 - consistently the best fit between a learner's needs and the programme of learning which is offered regardless of the location of learning: remote learners and those in non-institutional settings should enjoy the same quality of service as those in colleges
 - an improved capacity to provide the infrastructure required to support learners, in particular information systems, students tracking and portable records of achievement
 - best value
 - the quality of teachers/trainers and managers: quality outputs require quality inputs.
- Measuring quality**
136. Clearer methods of measuring quality are required. Primarily, the measurement of quality should be through the development of and comprehensive use of appropriate performance indicators. Performance indicators will need to be fit for a wide range of provision. We recommend that work be urgently started to develop a better and wider understanding, ownership and common use of performance indicators.
137. Performance indicators should include:
- extent to which characteristics of learners are representative of the population generally, e.g. age, gender, socioeconomic background, disability and region
 - percentage of sessions observed graded one or two or equivalent
 - percentage of starters who complete (retention)
 - percentage of completers who achieve (achievement)
 - percentage of starters who achieve (success)
 - percentage of skills targets met
 - percentage of learners going on to employment/higher education
 - best-value indicators

representative and interest groups as well as with providers

- inspection reporting mechanisms to support monitoring of institutional performance in a format compatible with data available from the funding body about provider performance
- mechanisms for monitoring the level of individual and employer investment in education and training
- mechanisms for measuring efficiency of the institutional arrangements of the national and local learning and skills councils, including feedback from providers
- mechanisms for monitoring schemes for learners with learning difficulties and disabilities, and minority groups.

(Also see paragraphs 136 and 137 on measuring quality.)

How can we ensure that the Learning and Skills Council and its local arms develop effective links with partners at national, regional and local level?

125. Clarity of roles and responsibilities must be the basis for effective links with partners. This will be essential given the range of bodies involved, in order to avoid duplication of effort. We have commented earlier on the nature of the ‘fair and competitive market’ that the Government aims to create, and the role of the public sector in that market. We do not feel that the model is yet clear.
126. A clear sense of the terms upon which providers are expected to collaborate and to compete will be important as providers position themselves for the new arrangements. We recommend that arrangements should aim to maintain stability.
127. We believe that the large public-sector providers such as colleges have an important potential to act as a local or regional resource for professional development and support of staff. The new arrangements need to unleash this potential by articulating more clearly the role of the new public sector within the arrangements. This should not undermine the expertise of the range of voluntary, specialist, community and private providers, but should provide a framework for effective collaboration.
128. We identified earlier in this response, the need for clarity regarding responsibilities for planning and meeting the skills agenda (see paragraphs 32 and 34). Liaison arrangements between local learning and skills councils and RDAs will need to be established in relation to local and regional skills strategies. It must be clear where leadership and responsibilities lie in relation to this important agenda.

Chapter 5. Improving quality

What more should we do to ensure we drive up quality in post-16 provision?

Summary of key points

- We believe that quality assessment (inspection) is rightly separated from the process and culture of quality improvement.
 - The reorganisation of post-16 learning, and the centrality of raising standards, provides a unique opportunity to achieve a clear and common understanding of what is meant by quality and how to measure it. This opportunity should not be missed.
 - The focus of inspection must be first and foremost on assessment of observed teaching and learning.
 - There should be a common framework for inspection across the new sector. This should be flexible and capable of adaptation to different settings. It should build on the best elements of the existing frameworks and be capable of articulation with quality systems in higher education. It should be evidence-based, use benchmarking, employ grading systems and include subject-focused inspection.
 - A quality improvement strategy should address the requirements of learners and all stakeholders, such as employers, employees and parents. A range of external interventions are needed; these should be based on quality standards.
 - Benchmarking should be adopted as an important means of driving up quality. Other measures should include the development of incentives which are carefully designed to avoid ‘perverse incentives’.
 - FEDA welcomes the requirement for initial teacher training and recommends a further requirement for continuing professional development.
 - FEDA recommends a quality improvement drive on standards at entry level, levels one and two, aiming to increase the numbers who progress to, and succeed at, level three.
 - We propose the establishment of an accurate picture of quality standards across the new sector to provide the baseline data against which improvements can be measured.
129. As a key principle, FEDA believes that the drive that is needed to improve quality should focus on all three of the Secretary of State’s priorities:
- raising standards
 - widening participation to all social groups
 - ensuring high levels of skills and employability for the workforce of the future.

the emphasis on ‘smooth and successful transition’. The Youth Support Service will have a 13–19 remit, and ‘graduation’ is likely to focus attention on the 14–19 curriculum as a continuum. Coherence between the pre- and post-16 curriculum is vital to the continued engagement of young people and needs to be a focus of the work of the Young People’s Learning Committee.

52. We welcome the role of the Young People’s Learning Committee and the Learning and Skills Council, in the ‘promotion and support’ of work-related learning and work experience programmes ‘for those aged under 16’. Under current arrangements, funding for work-related provision for 14–16-year-olds in colleges has not been possible. We recommend that the Learning and Skills Council be given powers to fund 14–16 provision outside the school environment where appropriate, and that a clear budget is allocated for this work.
53. The proposals in the White Paper locate a responsibility for post-14 vocational learning with the Learning and Skills Council, but leave 14–16 non-vocational learning outside. It should be recognised that while we support the capacity for this provision to be funded by the Learning and Skills Council, this does create a potentially divisive arrangement.
54. We do not support the association in the White Paper between the vocational curriculum and ‘those who are not motivated by a traditional curriculum offering’. There is a strong implication in the White Paper that the work-related and vocational curriculum is for the least successful learners.
55. The proposals in the White Paper also imply that pre-16 provision outside schools is for less successful and ‘non-academic’ learners. For example, it refers to ‘schemes whereby disaffected and excluded 14–16 year-old pupils are able to study in colleges and with voluntary-sector providers in conjunction with employers’. Such statements run the danger of undermining the potential for greater parity of esteem across the range of provision in the new sector.
56. We note that under the proposed arrangements there will be split responsibilities for the curriculum of young people, between QCA and the Learning and Skills Council. A comprehensive overview of the whole 14–19 curriculum is needed to consider issues of curriculum progression and continuity, and patterns of participation, achievement and take-up of new curriculum opportunities. In order to secure coherence between the work of the Learning and Skills Council and pre-16 learning, we recommend that the following options be considered:

- joint working between the Learning and Skills Council and QCA
- overview responsibility given to the Young People’s Learning Committee
- a joint Learning and Skills Council–QCA committee established.

Are the proposed responsibilities of the local learning and skills councils the right ones to ensure responsiveness at local level to the needs of local labour markets and communities?

Responsibilities

57. We support the proposal for a national framework with common funding systems with local arrangements that encourage provider responsiveness to individual, community and business needs. The relationship between the national Learning and Skills Council’s influence through its funding mechanism and the local learning and skills councils’ influence through strategic planning is as yet unclear. The precise balance of powers between the local and national Councils is therefore uncertain. However, the extensive powers of the local learning and skills councils in relation to planning are likely to make them the focal point for providers.
58. Prior to college incorporation, some local education authorities (LEAs) carried out detailed numerical planning of places in specific areas of provision. This was not effective in securing a responsive system of education and training. We strongly recommend that the focus of the local learning and skills councils be on establishing strategic direction and priorities, rather than on detailed numerical planning of provision, leaving flexibility for providers and local learning partnerships to respond to local circumstances.
59. We urge the Government to recognise the limitations of annual planning cycles to achieve more than broad strategic objectives and to avoid an approach which purchases specified numbers of places on specific programmes. This is likely to lead to the delivery of those specified numbers only and to a less responsive framework.
60. Currently the FEFC funding mechanism allows colleges to distribute resources flexibly. We believe that this system has encouraged local initiative, responsiveness and enterprise which should not be stifled under new arrangements.
61. We note that the local learning and skills councils will have responsibility for ‘ensuring a fair and competitive market which new providers are encouraged to enter, provided they meet agreed quality standards’. The nature of the learning market that the Government intends to create

is unclear, and the extent to which collaboration and partnership can be fostered in a competitive environment needs examination. (Also see paragraphs 7–9.)

Meeting the needs of local labour markets

62. We welcome the involvement of employers in the process of identifying the skill requirements of the national and local labour markets. However the forecasting of labour market needs is extremely complex and individual employers are unlikely to be capable of accurately predicting medium-to long-term needs. (Also see paragraphs 194–197.) We believe that National Training Organisations (NTOs), taking a sector-wide approach, have an important role in advising on trends and the range of skills and competencies required in particular sectors. However, more dynamism and structured partnership working between NTOs, providers, RDAs and employers are required to ensure that the standards set are matched with the skills developed.

63. Advice on newly emerging processes and products and their likely impact on skill needs may also be obtained from suppliers of equipment, and large firms with research and development capacity. Securing this information will not be straightforward, because of commercial sensitivity and the multi-national nature of many large companies.

64. Providers need information which is sufficiently local and detailed to reflect their markets. The available labour market assessments often do not match their needs sufficiently well for planning purposes, or sound information is not always readily accessible.

65. We recommend that the needs of the labour market are determined through an interactive process, based on intelligence gathered from a range of retrospective, current and forward-looking sources of information.

Data collection

66. We welcome the requirement for assembling comprehensive data. This will be a valuable resource for policy development and planning both locally and nationally. The precise data requirements will need very careful consideration, and will need to align with the performance indicators and targets for the sector. We recommend that data on Employment Service-funded provision be collected in a format consistent with Learning and Skills Council data.

Membership

67. The proposed emphasis on ‘consumers of education and skills’ means that care must be taken to ensure that they are well-informed about

a range of complex issues such as qualifications and what they mean in terms of skills, knowledge and understanding. We recommend early investment in briefings and development opportunities for members of the local learning and skills councils in order that they develop an understanding of the whole post-16 sector.

Relationships with other bodies

68. Local learning and skills councils will have to manage complex relationships with:

- local learning partnerships
- RDAs in relation to skills strategies and planning
- local authorities regarding provision for 16–19s and 14–16s in work-related learning
- local authorities regarding adult and community provision and the fit with lifelong-learning plans
- Ufl, and the hubs that are currently being developed
- small-business services regarding business support.

69. FEDA’s preference, proposed in our submission to the post-16 review, was for regional learning and skills councils with the same boundaries as RDAs. We are concerned that there is potential for complexity at the sub-regional level under current proposals. The most problematic part of current arrangements is the relationship between local learning partnerships, local learning and skills councils and RDAs. To minimise this risk it will be essential to establish:

- clear local and regional structures for consultation and decision making with the range of local and regional interests
- clearly differentiated and well-understood responsibilities.

Are the functions described for the local learning partnerships the right ones to build on the momentum already generated?

70. We believe that the strength of local learning partnerships is in the engagement of local partners in developing informed local solutions, and ensuring responsiveness at local level. This is particularly required to meet the needs of local business, to develop effective strategies for basic skills and increased participation, and to develop a strategic approach to addressing social exclusion. Ownership of national learning targets at local level will be essential to their achievement.

71. Collaboration at delivery level can:

- support coherent planning
- influence individual institutional plans to achieve targets

- address the needs of learners with learning difficulties and disabilities. We wish to see an end to discrimination against people with difficulties and disabilities in post-school education and training provision. Although training provision is included within the Disability Discrimination Act, education is currently excluded. We recommend that the Disability Discrimination Act be amended to include all forms of post-school education and training.
115. Disability statements currently required of FE colleges and LEA adult education services have been shown to be beneficial to the organisations as well as to prospective students. We recommend that all providers of education and training be required to produce disability statements and to update them annually.
116. We welcome the power to fund specialist provision including residential provision for learners over compulsory school age. As much specialist residential provision is national rather than local or regional provision, the Learning and Skills Council will need to consider how arrangements can best be made to incorporate provision into planning. We recommend that specialist residential provision, that is a national resource, be incorporated within planning and funding at local and regional level.
117. Transition planning needs to involve all relevant agencies and build on post-14 reviews. It can provide sufficient information for decisions to be made about the most appropriate placement to match individuals' future learning needs and to enable learners to progress smoothly to their post-school placement.
118. Currently, learners seeking placement at a residential specialist college are forced to go through an ineffective and distressing process. It is universally deplored by all parties concerned (*Assessing for placement*, FEDA, 1999). Learners are required to be assessed at sector colleges to ensure that the college is unable to meet the needs. This is inappropriate. It is reasonable for students to apply to and be assessed at a college only when it is a realistic possibility. An effective transition planning process will provide opportunities for informal visits and tasters that can provide such information.
119. We recommend that the Learning and Skills Councils fund placements at specialist colleges on the basis of recommendations arising from the transition planning process and require formal assessment at a mainstream provider only where this represents a realistic option.
- Are these the right set of critical success factors against which to evaluate the new arrangements?**
120. We broadly support the success factors identified, but recommend that these need to be translated into detailed targets in order to be measurable. We welcome the emphasis throughout the White Paper on the value of good evidence and data and the need for this to be consistently available across the new framework. We also recommend (see paragraph 66) that the data from Employment Services-funded provision be collected in a compatible format.
121. In order to support the social inclusion agenda data will need to be collected on individual learner characteristics (such as previous educational achievement, race, gender, age, socioeconomic group, employment status, etc.). Earlier in this response (see paragraphs 80–81) we recommended that national targets be revised to relate not just to age groups, but to learners with particular characteristics.
122. We support the focus on driving up standards of provision. We believe that data on individual learner retention, participation and achievement should be available for all post-16 (or ideally post-14) learners in education or training, irrespective of the funding stream. To support this, we recommend (see paragraph 20) that an inspection framework which grades aspects of provision, on the basis of well-defined, transparent criteria, should also be a common feature in order that improvement in institutional standards can be monitored through a simple numerical device.
123. Measuring the success of the new framework must also include monitoring of the levels of administrative costs and efficiency of the new arrangements, including the perception of the providers. Baseline data against which to measure the financial efficiency of the new sector should be agreed.
124. The creation of a comprehensive framework for data collection and monitoring is an urgent and complex task. We recognise that the capacity of providers to submit detailed data is currently varied. We recommend that work is carried out in the run-up to the operation of the new Learning and Skills sector, to establish a viable system of data collection, monitoring and review, which can operate nationally while allowing data to be reported on a local and regional basis. This system will need to include:
- systematic feedback mechanisms to monitor client satisfaction, at initial enquiry and information stage, during their programme and on progression beyond the programme
 - agreed sets of learner characteristics for monitoring widening participation and social inclusion policies agreed with relevant

103. For young people one of the major financial barriers to access has been identified as the cost of transport. Transport, or lack of it, has presented a considerable barrier to disabled people in gaining access to education and training.
104. For a significant minority of older students the costs of childcare represent an even larger problem. The funding directed through colleges to help meet the costs of childcare (£10 million in 1999/2000) has enabled institutions to integrate this aspect of student support with their use of access funds for both further and higher education and to integrate it where possible with the training of childcare workers. There is a clear need for levels of support to be maintained or possibly increased as a means of widening participation. There could be a role for local learning partnerships in helping to plan the allocation of funds but we would see a need to maintain an integrated approach to delivery at the level of the provider.
- University for Industry**
105. There is a need to ensure that the development of the Ufl is aligned with the investments made by local providers across other aspects of their work. We see the local learning and skills councils as being the natural focus for linking with the Ufl hubs. They are also among the key users of information which Ufl can provide about market preferences.
- Individual learning accounts**
106. One way of responding to local circumstances might be for local learning and skills councils to administer individual learning accounts, reflecting any national priorities set for the accounts but also reflecting local needs. It would be one way of routing funds for priority needs accurately, while preserving the transparency and simplicity of the national tariff.
- Guidance**
107. There is a natural alignment between the detailed knowledge of an area, its provision and needs which the local learning and skills councils need for planning purposes and the information which is required for effective guidance to individuals. For this reason we see it as desirable that the local learning and skills councils should have a strong role in the operation of guidance services, working closely with local learning partnerships. This would align well with the operation of a more locally based Learning Direct service and administration of ILAs.
- How can we ensure that the planning and funding arrangements support people with special needs?**
108. The bringing together of provision within a single framework for planning and funding is potentially positive for people with learning difficulties and disabilities. We welcome the removal of the unhelpful limitations on funding imposed by schedule two. This has had an adverse impact on some people with learning difficulties and disabilities. It has led to the exclusion from further education of those who have been unable to meet the progression criteria of schedule two (j).
109. It will be essential under new arrangements that priority is given to funding a wide range of learning opportunities that enable those with the most severe and profound disabilities to progress at the same level, or at lower levels, for those have degenerative conditions. If priority is given solely to a limited range of qualification and employment outcomes, people with the most complex learning needs will continue to be excluded.
110. To ensure that the Government's commitment to equality of opportunity is realised it will be essential that the criteria for funding are not so narrow or vocationally related that they once again exclude those with the most profound and complex disabilities. We recommend the adoption of the principle of entitlement to ensure that all learners, irrespective of the nature or extent of their disabilities, are entitled to access to learning on an equitable basis to those who have clearly definable employment or qualification outcomes.
111. That entitlement needs to include access to provision that matches individuals' learning needs and to effective support. If support is to be effective, it is essential that it be properly funded. We recommend that the Learning and Skills Council adopts the additional support funding mechanism currently applied by FEFC, with minor alterations.
112. FEDAs evaluation of this funding mechanism shows that it is well regarded and well used and enables institutions to meet the needs of individual students without being financially disadvantaged. There is strong support for the continuation of the additional support funding mechanism from FE college staff (*Evaluation of the additional support mechanism* [CRM 201], FEDAs, 1999).
113. The lack of a similar funding mechanism for adult education and training has been cited as a reason for exclusion from provision or the failure to provide effective support. The Learning and Skills Councils have the opportunity to address this problem by introducing an additional support funding mechanism across all provision for students with learning difficulties and disabilities.
114. We welcome the requirement that the Learning and Skills Councils will have a particular duty to

- provide a focus for good practice and innovation in delivery
 - enable coordinated approaches to address local priorities
 - provide a forum for direct dialogue between employers and providers to meet business needs.
72. In order to support the operation of the local learning partnerships, a national framework is required, to include arrangements for:
- supporting and servicing partnerships
 - receiving and distributing funds
 - decision-making.
73. There is a danger that the extensive powers and responsibilities of the local learning and skills councils will undermine the status and the commitment made to local learning partnerships. Local learning partnerships have initiated the partnership agenda locally, are tackling it with energy and commitment and have already developed good practice. However, the relative importance given to this role, compared to the role of the Learning and Skills Councils in securing a ‘fair and competitive market’ is unclear. This remit for the Learning and Skills Councils could undermine the focus of the local learning partnerships on collaboration.
74. We note the recent announcement of funding for local learning partnerships to support adult information and guidance. While we recognise that local learning partnerships are well placed to carry out this role, we feel that if there are to be separate services for adults and young people, that liaison between them will be essential. We recommend that a clear responsibility be established with the national Learning and Skills Council for securing effective liaison between the advice and guidance services for adults and for young people.
- How can the local learning partnerships best work with and support the local learning and skills councils?**
75. As stated in the White Paper, the role of local learning partnerships within the family of organisations needs to be explicit, and clear boundaries established. The role described for learning partnerships ‘acting as a catalyst for collaborative action at the local level and ensuring coordination of efforts’ is particularly significant, but will require a sound operating framework. Clear delineation of roles and responsibilities should provide the basis for effective working relationships between local learning partnerships and local learning and skills councils.
76. There is a danger currently that impetus will be lost due to uncertainty about their future role. Boundary changes are adding to this uncertainty, and may lead to local people devoting their energies elsewhere, particularly where it emerges that local learning partnerships and local Learning and Skills Council boundaries are coterminous. We urge that the legislation clarifies the roles and responsibilities of local learning partnerships in relation to local learning and skills councils. FEDA’s response to the post-16 review proposed that responsibilities should be split as follows:
- At national level, planning targets need to be generated for the sector as a whole, taking into account demand for skills in particular sectors and regions, and quantifying national learning targets for particular age groups.
 - At regional level, a fit between local (bottom-up) planning, national target requirements and the regional skills strategies of RDAs is negotiated.
 - At local level, plans are developed in collaboration with supply – and demand-side partners to meet targets and other local priorities.
 - At individual deliverer level, plans are the basis of funding agreements with the national funding body.
77. We believe that clear delineation of responsibilities along these lines is needed to secure effective local and sub-regional working.
- What more can we do to ensure accountability at local and national level?**
78. The division of responsibilities between the national and local learning and skills councils needs to be quite clear in relation to ‘quality, standards and probity’. FEDA’s view is that the establishment of these standards should be a national responsibility, and the local learning and skills councils should have a role in monitoring their application. National consistency of standards will be vital to ensure fair and coherent arrangements. (Also see paragraph 12.)
79. Roles and responsibilities of the different agencies and organisations operating at local, regional and national level must be clear if accountability is to be achieved. There is potential, given the complexity of the new framework and the number of organisations involved, for lines of accountability to be blurred.
80. The transfer of responsibility for setting and meeting national learning targets to the Learning and Skills Council will be a driving force for the work of the national and local learning and skills councils. Currently targets address only specific age-related groups. To deliver the social inclusion

or widening participation agendas, the targets need to be developed to reflect more specific learner characteristics such as previous educational attainment, employment status, race and gender.

81. We recommend that the national learning targets be further developed to specify learner characteristics in order to reflect the Government's objectives for social inclusion and widening participation.
82. There are discrepancies currently in the ways in which private providers and colleges are held accountable for their funding which need to be considered in the context of the objectives for the new sector and the Government's aims for modern public services. (See paragraph 12.)

Chapter 4. A framework for success beyond 16

Is there more we should do to ensure that we strike the right balance between national arrangements and local flexibility and discretion?

83. We believe that a major benefit of the proposed changes should be to secure more consistent national opportunities for education and training, in order that the system is fairer. We also recognise that it is vital that the needs of local communities, including individuals and employers, can shape local provision.
84. The balance between national and local must be cost-effective and promote quality, access and equity and responsiveness to local needs. We therefore find much to commend in the arrangements proposed. In particular we see a demand-driven funding model, based on a tariff as capable of reflecting variations in need with the minimum of bureaucracy. We would endorse proposals that the great majority of funding flows directly to providing institutions through this route.

Access and equity

85. The proposals support access and equity in several important ways. The unification of funding streams through a single council should help eliminate differences in funding that derive from different organisational arrangements rather than learner need. The inclusion of school sixth forms within the remit of the Learning and Skills Council could further aid this by eliminating the substantial variations in cost between school-based and post-school learning.
86. Equity is additionally served by a tariff that reflects the fact that different programmes necessarily have different costs. While simplification of the methodology is a desirable objective, post-16

learning covers a wide and varied field. Too simple a model risks discriminating against those who wish to study valuable but expensive subjects such as agriculture or catering.

87. In a similar way it is possible for a tariff to recognise that some groups of learners require providers to incur additional expense. This can derive from either characteristics of the individual (for example, having a first language other than English), or of the community (living in a sparsely populated area such as Cornwall, or an area of high cost such as inner London). Consideration is needed about the extent to which variations in the tariff are made at a local or national level.
88. Unified arrangements should facilitate the establishment of a clear pattern of entitlements for groups of learners. The nature of provision which learners can expect to be offered (particularly at 14–19) should not depend upon the accident of geography or the financial circumstances of individual providers. In this connection we would endorse the approach being developed by the FEFC in response to Curriculum 2000 as set out in circular 99/33 which offers an entitlement to a broad programme of study, including key skills and enrichment. FEDA is working with FEFC to extend the proposals in that circular to foundation and entry-level students, and sees the developments as supportive of moves to introduce an overarching certificate and a concept of graduation.
89. Some aspects of access and equity cannot be dealt with by a national tariff. Meeting the particular circumstances of learners who require additional support is an important example. An element of local discretion would be one way of reflecting such needs but might lead to inconsistency at a national level. The FEFC's additional support mechanism has been evaluated by FEDA and has been found to be the most effective means of providing support for learners with learning difficulties and disabilities. We propose that the same approach, with minor modifications, be adopted by the Learning and Skills Council. (See paragraph 111 for recommendation.)

Quality

90. A national tariff approach can support quality because it is capable of transmitting policy priorities very effectively. In England and Wales the FE funding councils have used the funding mechanism to reward improvements in the performance of providing institutions and there is a substantial body of evidence that this has led directly to improved practice. We would support the evidence from the school sixth-form funding pilots that this principle might also be applied in school sixth forms.

91. A national system of rewards and sanction, signalled through the funding mechanism should be a major component of any drive to raise standards. It needs to be complemented by specific actions which are particular to individual providers. We therefore support an element of funding for quality improvement which is allocated locally on the basis of individual plans, and knowledge of local circumstances.

Responsiveness

92. We see local flexibility to meet the needs of learners, employers and communities being best met by a strong network of providers committed to an inclusive and responsive approach. A national funding framework can provide incentives which reinforce such an approach, but we believe that it is most effectively driven by the missions of the institutions themselves.
93. We welcome the affirmation in the White Paper that learning partnerships have a central role in planning and organising delivery. In order to build a responsive system, local learning and skills councils need to establish stable relationships with local providers on the basis of partnership rather than on a simple purchaser/provider basis.
94. There is clearly a need for local learning and skills councils to be able to fund innovative projects which might initially not be economic for providers to offer and to respond to particular local circumstances (such as plant closures). A specific sum should be available for this purpose, either held locally or available to draw down against specific criteria from a national fund. We recommend that specific criteria be drawn up nationally to identify the range of local priorities and circumstances for which local discretionary funding can be used.
95. We believe that the new learning and skills sector should be national. Greater coherence and consistency of provision nationwide could be a major benefit. We recommend that local variation of funding should be kept at a level that allows specific needs to be met without creating great discrepancies in the provision available nationally.

How can we guarantee that the arrangements ensure integration of all the public funding available within the area?

96. The integration of all public funding in an area is an objective we welcome for the reasons set out in the previous section. We can identify a number of areas where local learning and skills councils might play a useful role.

European funding

97. The local learning and skills councils should build into their plans sources of funding through the

European Union as the White Paper sets out. They need to do so in a way that retains some incentive for institutions to participate in developing bids since successful initiatives will frequently depend on action at institutional level. If the effect of bidding successfully for EU funds is simply to reduce the funding available from UK sources the commitment of institutions is unlikely to be great.

98. It would be helpful if the Learning and Skills Council could find ways of reducing the impact of the differing financial years used by the EU and UK government agencies. One highly regarded feature of the FEFC approach has been to fund colleges in years which relate to their major cycles of activity. By contrast the calendar years on which some EU funding is based causes major difficulties in planning.
99. It should be recognised that bidding for funding can take away from equitable distribution of resources; may not reward those whose needs are greatest; and can mean that providers are subject to fluctuating funds which militate against coherent planning.

Learner support

100. The provision of financial support for individuals has two components. There is a need to provide for specific and immediate assistance with financial hardship, which can be done at the level of the providing institution through a mechanism similar to the FE access funds. As work for the DfEE has shown institutionally based arrangements can combine efficiency with a high degree of sensitivity to individual circumstances. However, such arrangements will not reach those in work-based learning and are unlikely to reach those not associated with a single institution.
101. There is also a need for support for learners to enable them to access the institutions which best meet their needs either through assistance with transport or residential accommodation. This needs to be done above the level of the institution, taking into account the overall pattern of provision in an area. The local learning and skills councils might best carry out the provision of these elements of student support.
102. The possible introduction of a national scheme of education maintenance allowances will address the needs of young people from very poor backgrounds. Arrangements will still be needed however to address the needs of adults (the major recipients of access funds), to provide a means of supporting young people with occasional rather than chronic financial crises, and to meet the widespread need for support with transport costs.