

Raising Standards in Post-16 Learning

Response from the Further Education Development Agency

Introduction

1. FEDA welcomes the consultation paper and the opportunity to comment on the proposals. In addition to responding to the specific questions in the consultation document, we would like to highlight the following key points.

Definitions of quality

2. Definitions of quality and success that take account of the range of objectives for the Learning and Skills system and the diversity of learners and of provision will be difficult to determine. Care will be needed to maintain the highest possible facilities and provision without making it impossible for providers addressing niche or complex needs to operate in the system.
3. This is particularly pertinent in relation to small training and community providers that can play an important role in reaching reluctant, disengaged or specialist groups or individuals. Location, specialist resources or teaching skills or empathy and understanding of staff may each be the most vital consideration for learners in different circumstances.
4. For example, community provision aimed at increasing participation from areas of disadvantage and under-achievement may be viewed by learners as more accessible if teaching staff are local, familiar and empathetic. While the opportunity for staff to train for professional qualifications must be an option, it may be unrealistic for qualified staff to be a pre-requisite. Equally, a highly specialist technical training provider may offer limited learner support facilities on site; neighbourhood learning centres may not offer access to a wide range of support systems and resources. However, these may meet particular learner needs.
5. We therefore believe that learners' perceptions of quality and what is important will need to be taken into account in judging quality.
6. In addition, care will be needed not to create incentives which deter providers from recruiting the most hard-to-help or disadvantaged learners. If year on year improvement of retention and achievement is required of all providers, irrespective of their particular focus, perverse incentives could be created.

7. For example, providers may feel compelled to recruit learners who are more likely to be retained and successful. In reality, success with disabled learners may be to maintain rather than to improve levels of skill. For some providers, increasing the recruitment of, for example, homeless young people or those with mental health problems may be consistent with their mission and an indication of improved services. However this may not be compatible with increasing retention and achievement.
8. We therefore recommend that definitions of success and improvement should take into account the aims and mission of the individual provider – one size fits all may not be appropriate.

Promoting collaboration

9. We welcome the local focus of planning and funding set out in the Learning and Skills Act. Arrangements should promote partnership and collaboration between providers to meet the range of learners' needs more effectively. We believe this could result in better progression arrangements between providers and better co-ordination and access to facilities such as libraries, learning centres and childcare provision within a neighbourhood or local area. Such collaboration could transform the opportunities available.
10. For this potential to be realised appropriate funding incentives will need to be considered, and the quality assessment and improvement arrangements will need to recognise the value of collaboration and partnership as a vital dimension to a quality service. We recommend that consideration be given to ensuring that quality assessment, whether by the inspectorates or by the Learning and Skills Council (LSC), pay due attention to partnership and collaboration.

Threshold standards

11. The consultation paper focuses on the levers and processes needed to continually improve performance. Clarification is still needed about the threshold capacity required of providers wishing to contract with the LSC. Given the government's desire to encourage new providers, we believe that there must be minimum requirements that represent a license to operate in the new learning market. (Aspects of provision that might be part of threshold requirements are suggested in response to question 3, see paragraph 27.)
12. Review processes should then ensure that providers develop their performance beyond that threshold. There should be consultation on the threshold requirements in order that their impact can be assessed.

Terminology

13. We welcome the public statement by the DfEE that they will not adopt the term 'supplier', and agree that the term 'provider' is preferable.

Q1 Do you agree these are the key design principles to underpin the development of the arrangements for raising standards in post16 learning?

Tend to agree

14. FEDA supports the seven design principles and particularly welcomes the commitment to minimising bureaucracy and the recognition that the way the arrangements are applied will reflect the diversity of providers and learners in the sector.
15. There is, however, a potential contradiction in the statement that all suppliers will be "treated with equal rigour" and that the arrangements will be applied "according to the standards achieved by suppliers". It would be helpful if this could be clarified by reference to, say, preferred or accredited status, if this is implied.
16. We welcome the recognition in this section of the report (Chapter 1 paragraph 6) that new and specialist suppliers in the voluntary and charitable sector may need support to meet LSC requirements. These can make a vital contribution to the objectives of widening participation, community capacity building and regeneration.
17. We recommend that the statement that providers have the main responsibility for raising standards (mentioned in a description of the role of providers in chapter 2) should be one of the key design principles. This would assist in developing a partnership approach to quality improvement, rather than a model which relies on monitoring by the LSC. Quality needs to be part of providers' ongoing dialogue with the LSC, rather than an issue which is addressed episodically. This would encourage more openness in concerns about quality and addressing these should be seen as a strength rather than a weakness.

Q2 Do you agree these proposals provide clear responsibilities for those involved in raising standards in post-16 education and training?

Tend to disagree

18. We agree that the responsibility for improving the quality of provision must rest primarily with providers. We also welcome the duty on providers, set out in the Act, to promote equality of opportunity. This is a vital dimension to quality and we believe that the annual report on implementation of this duty will help to raise the profile of equal opportunities. We recommend however that some providers will need support to develop their capacity in relation to both improving quality and promoting equal opportunities.

Relationships with inspectors

19. Whilst the proposals helpfully outline respective responsibilities, the contribution of local LSC staff and inspectors (the Adult Learning Inspectorate and Ofsted) remain unclear. For example, it is unclear where responsibility lies for approving the adequacy of action plans and monitoring providers causing particular concern. The consultation paper refers (Chapter 2 paragraph 21) to the inspectorates monitoring suppliers causing particular concern. We suggest that the inspectors should approve the plan produced post-inspection but that the LSC should monitor this in consultation with the inspectorate. It will be vital to providers with significant weaknesses that there is no ambiguity over roles.
20. We strongly support the independence of the inspectorates and believe the information generated through inspections provides vital data to inform quality improvement. There is currently an overlap between the role of inspectors and local LSCs in promoting quality improvement. Inspectorates are well-placed to identify good practice. However, direct development activity should be outside their remit to safeguard their independence in scrutinising provision.

Relationships with other partners

21. There is some overlap between the role of the national quality unit and the Inspectorate in proposing strategies for raising standards and disseminating good practice. We are pleased to see the emphasis on close working relationships with other national agencies with a remit for quality improvement such as QCA and the NTO National Council.
22. Many providers will contract with the Employment Service (ES) as well as the LSC. We recommend that common approaches to quality assessment, monitoring and improvement and accredited and preferred status be established across both agencies. This would simplify the requirements on providers.
23. The consultation papers suggest (Chapter 2 paragraph 36) that Learning Partnerships should identify concerns about the quality of provision in particular organisations. We do not believe that this is an appropriate role for learning partnerships. It would not be feasible to carry out such a role whilst maintaining the trust needed to sustain an effective partnership.
24. We note that LEAs will continue current arrangements for monitoring 6th form provision and adult and community provision. This implies that both the standards and systems will be different for these sectors of the new Learning and Skills system. We believe that there should be a commitment to alignment of standards and systems for all providers operating within the Learning and Skills System.

Accountability of LSCs and ES

25. The consultation document refers to local LSCs' annual reports on the action taken to raise standards. We suggest that, in addition to retrospective reports, they should be required to publish development plans with priorities for action. This would be the

equivalent to provider development plans. This is only mentioned in relation to area wide inspections which reveal weak provision. The mechanism for how LSC and ES will demonstrate their accountability for raising standards is not covered in the proposals and requires further development.

Q3 Do you agree the proposed contracting arrangements strike the right balance between ensuring high quality provision while encouraging innovation and new suppliers to enter the market?

Neither agree nor disagree

26. The consultation document states (Chapter 3 paragraph 29)) that new suppliers will need to meet the post-16 quality requirements. However there requirements are not specified. Threshold requirements for new and existing providers must be clear.
27. In determining whether a provider is fit to operate, the quality of provision for learners must be the paramount consideration. Threshold criteria should reflect this and could include the following:
- Experienced teaching staff
 - Appropriate resources
 - Learner support systems consistent with the proposed target group
 - Financial competence
 - Health and safety
 - Capacity to provide reliable data on learner participation and achievement.
28. It is important to recognise that innovation is not only achieved through new providers. New provision is routinely developed by established providers. TECs have funded innovative approaches to social inclusion through their training provider network. Many colleges have, since incorporation, significantly changed their provision and student profile and others have been encouraged, through special funding or support programmes, to develop innovative provision, for instance in widening participation, inclusive learning and ILT.
29. It should also be noted that quality and effective strategic planning will be enhanced by a stable network of providers. Introduction of new providers on a significant scale could lead to instability. We therefore believe that new providers should be encouraged primarily where there is unmet need.
30. Existing providers of high quality (for example those with preferred or accredited status) could be invited to develop provision in a new locality, or different vocational area or to work in partnership with a new provider. They are likely to have the infrastructure in place and the capacity to undertake development work to secure a high quality product.

31. Potential models of partnerships or consortia arrangements to support small providers to reach quality standards should be explored to enable them to access public funding. Support could include networking, information and updating, and staff development activities.

Q4 Do you agree with the requirements of suppliers and do they focus effectively on raising standards?

Tend to agree

Review processes

32. FEEDA supports the proposals for regular review incorporating an annual self-assessment process and development planning. The requirements outlined (for instance the list of indicative evidence to inform ES and LSC assessments) place more emphasis on proving rather than improving quality. The balance needs to be redressed to focus providers' attention on raising standards rather than on simple compliance.
33. The review process needs to be undertaken with rather than to providers. This will encourage providers to admit to weaknesses in the self-assessment process. Ownership of the weaknesses makes it much more likely that providers will address them.
34. The success of provider reviews will be dependent on local LSCs having skilled and qualified staff in place to carry out the review processes. More work is needed on specifying those skills and in training for staff to undertake the roles across a range of providers.
35. There is a case for separating the roles of monitoring compliance and support for improvement within the local LSC, so that the same person is not responsible for both assessing and developing quality. One option that should be considered is that the quality advisors, although operating locally, could be attached to the national quality unit to ensure that quality improvement strategies are applied consistently, effectively and efficiently.
36. The support currently offered to providers by the most effective TECs, and by the FEFC and TSC inspectors is highly valued and needs to be maintained. However, support in the past has not been consistent and some providers may not have built up the skills within their organisations to support continuous quality improvement. Building the capacity for self-improvement in all providers across the new Learning and Skills system should be a priority.

Evidence requirements

37. Provider efforts should be focussed on quality improvement rather than producing evidence. The review process must demonstrate the key design principle of

reducing bureaucracy. A single body of data should be collected once for use by inspectors, LSC monitoring, awarding bodies, etc. The LSC could be responsible for passing data to others as appropriate. Providers need stability in information requirements over a period of time. A common and comprehensive Management Information System, centred on the Individual Learner Record would facilitate this. However, many smaller providers will need support with appropriate hardware, software and systems.

38. The self-assessment process should be based on the inspection requirements, with supplementary auditing and monitoring data required by LSC, such as health and safety data. Visits to providers should be kept to a minimum, unless there is cause for concern arising from the data.
39. Inclusion of feedback from learners, and employers where appropriate, should be a requirement in order to strengthen the learner entitlement and to ensure that the focus on learner and stakeholder needs is central.
40. Care is also needed to avoid perverse incentives. The requirement for year on year improvements may deter providers from recruiting the most hard-to-help learners, or learners with disabilities, in favour of those who are more likely to be retained and successful. The provider's mission and the local context should inform the reviews.

Flexibility

41. Small and new providers should be given assistance in developing self-assessment processes and may find the requirements costly in terms of staff time. There should be a range of self-assessment processes, drawing on the best of existing processes appropriate to providers.
42. The review must be "fit for purpose" so that it can adapt to organisations of different sizes and missions i.e. the processes may be different but the outcomes and standards would be equally rigorous. This approach could minimise the risk of employers pulling out of work based training because they see it as too bureaucratic. One approach might be for the local LSC to develop a risk assessment process so that the frequency and depth of review is based on how a provider measured up to a defined set of criteria. Providers who are in a category, say, giving "cause for concern" could be assessed quarterly, whereas preferred suppliers showing continuous improvement would only need an annual check-up.
43. National providers (training providers or bodies such as the Workers Education Association) who have a single contract with the LSC but deliver through locally based sites or centres, should be subject to local review to ensure the quality of delivery. Definitions of 'sites' or 'centres' and the practicality of this approach need to be explored.

Monitoring implementation

There should be a mechanism for feedback from providers to the LSC, especially in the early stages, about any weaknesses in the review process. The national quality unit may wish to review the processes to ensure they are operating equitably. We recommend that there is a code of practice to which local LSCs should adhere (see also response to Q10)

Q5 Do they favour any type of supplier at the expense of others?

44. The proposals will tend to favour larger providers. The resource implications of complying with quality requirements, in particular preparation of self-assessment reports and data collection and analysis could be significant for smaller providers.
45. Adult and community providers will need review processes that acknowledge the difficulties in measuring achievement which is not based on qualifications. The emphasis on learner achievement as an indicator of quality is appropriate for much provision. However, a substantial range of provision will not be designed to deliver qualifications. Measures of achievement need to be able to recognise a range of positive outcomes if this provision is not to be disadvantaged.
46. The proposals need to be robust enough to accommodate increasingly flexible forms of provision, e.g. innovative methods of delivery including Learndirect, outreach and distance learning. Similarly it is critical that they do not favour any particular groups of learners.

Q6 Do you agree that a statement on post-16 learners' entitlements and responsibilities would be valuable for learners? What are the key issues to be addressed in taking this proposal forward?

Strongly agree

47. FEDA supports the statement of entitlement for all learners as a cornerstone of quality. We recommend it should be issued by the provider and framed as a learning agreement, which indicates the joint responsibilities of the learner and their adviser or provider in enabling the learner to achieve his or her goals.
48. Any documentation must be couched in learner-friendly language and have core principles that can be adapted to specific learner groups and institutional contexts. It should be built into existing systems, and should be presented to learners early in the initial guidance or assessment process, as well as being reviewed regularly. Providers should be required to show where the key principles are embedded in their quality processes, rather than to conform to a particular model. For example, key points could be highlighted on a student card, could form part of induction, or be

referred to in student satisfaction surveys and exit interviews.

49. Rather than a statement issued to learners on one occasion, there should be regular times during the programme when the learner and provider review the agreement. This should be an opportunity for receiving regular feedback, both positive and negative, from learners. The results should be fed into the providers' self assessment and review processes as part of the requirements of providers. This is an important component of quality processes and will also identify where improvements are needed. Aggregated feedback should be sent to Learning Partnership to assist them in their role of representing learner and community views to the LSC.
50. Providers will need to create the right environment for encouraging regular learner feedback. A named contact (for instance, the personal adviser, mentor, tutor or supervisor) should be allocated to each learner. Consideration should be given to whether such systems should be administered by individual providers or whether economies of scale could be achieved by running it through the LSC Learning Partnerships or consortia of providers. Training in customer care, including the management of satisfaction surveys and handling of complaints, should be available.
51. Problems should be dealt with by providers to avoid escalation of issues. However, learners and other stakeholders should ultimately have recourse to the LSC as an independent arbiter. It is crucial that named people and contact details are included to ensure that routes are clear to the learner and other stakeholders such as parents and employers.

Q7 What are the key issues to be addressed in developing common measures between the LSC/ES and other national agencies to inform quality monitoring arrangements?

52. Providers would welcome common data requirements across all agencies. This would enable providers to prepare a single data set to meet the requirement of a wide range of interested organisations such as QCA and Awarding Bodies as well as LSC/ES and inspectorates.
53. Common information systems will need to be developed across providers in the Learning and Skills system. In addition harmonisation of performance measures used by schools, colleges, and training providers is necessary.
54. It will be important to ensure the LSC review processes and the Ofsted/ALI inspection framework complement rather than duplicate each other. If they are assessing the same processes (for example management of the learning process, value for money, equal opportunities) it is important that they use the same language

and criteria. This could help to avoid the danger of disagreement between the two agencies about the quality of provision.

55. We welcome the suggestion (Chapter 3 paragraph 9) that LSC/ES will explore with other organisations, such as Awarding Bodies, the potential for common frameworks for data. Awarding Bodies collect valuable data about performance of different centres. We welcome the suggestion that this be made available to LSCs and inspectors to provide additional information on the curriculum being offered.
56. There are other national quality frameworks, which apply to post-16 providers. These include QAA subject review, NTO MA Quality Standards and the Guidance Accreditation Board. We recommend that these bodies work together to harmonise requirements as far as possible, and establish common terminology. This could help to reduce the burden on providers and bring greater clarity.

Q8 Do the proposed performance indicators provide an appropriate base to assess quality and continuous improvement effectively?

Neither agree nor disagree

57. The proposed broad areas for the performance indicators provide an appropriate basis, when taken alongside inspection evidence and providers' self-assessment reports. We welcome the inclusion of indicators such as learner satisfaction and the reference to a broad range of positive outcomes.
58. Value for money will be an important indicator. However its definition across different sectors will be complex and care will be needed to compare like with like. The approach to assessing value for money adopted by the LSC and the inspectorates must be consistent.
59. Destinations of learners and trainees can be an important indicator of performance. However experience has shown it is time-consuming for individual providers to collect. Economies of scale could be achieved by placing this responsibility with the local LSC, which will also have responsibility for publishing destinations data. Use of an individual learner identifier would aid tracking of learner progression routes between providers.
60. The relationship between the review process, target-setting and performance indicators needs to be clear and simple. Individual providers' targets set by agreement between the LSC and the provider should reflect local circumstances and the nature of different providers. These should also be reflected in the performance indicators.

Q9 In what circumstances are published comparative performance information and benchmarking helpful in raising standards? Are there circumstances where such information should not be published?

61. In instances where providers are very small, data is statistically insignificant and not helpful in benchmarking. Performance indicators can focus providers' attention on particular issues but in themselves do not improve standards. Guidance for providers is needed on how to use data: knowing who is doing better and then learning from their practice helps improve provision on the ground.
62. Publication of performance indicators, particularly on a local and sectoral basis, is helpful in providing comparisons for all stakeholders. However, care must be taken to avoid league tables that do not take account of the client group. It is important to compare like with like. There is strong support for the development of achievement measures of distance travelled, rather than full qualifications. This will help ensure that those who specialise in re-engaging hard to help learners are not disadvantaged.
63. In order to measure information about A level successes in school sixth forms on the same basis as other providers, data about students' relative entry levels must be included as soon as possible.
64. FEDA believes that publicly funded provision must be accountable and all information on learner achievement and quality standards should be in the public domain.

Q10 Do you consider the proposed supplier review will be effective and will identify suppliers who need to improve performance and who need additional support and/or guidance from the LSC and/or ES?

Yes

65. We believe that the proposed supplier review should be effective in identifying providers who need to improve performance.
66. Inspection will form an important source of evidence, which should alert the LSC to providers who need to improve performance, or need support, and we would expect the LSC to draw on inspectors' advice. However this will only be available on a four-year cycle. The annual review process will therefore be vital in monitoring quality on a more regular basis.
67. Consideration is needed about the extent to which reviews will be based on data, and the extent to which visits will be required. There are significant resource

implications of a model which relies primarily on visits. In addition it will be important that visits are not quasi-inspections, so there must be explicit guidance about who will undertake them and what criteria they will use as the basis for judgements.

68. For the bulk of provision, we believe that data on recruitment, retention, achievement and disadvantage, provided as part of the funding agreement, together with the self-assessment reports and development plans should provide adequate insights into quality. Unless there are specific weaknesses identified, site visits to monitor provision may not be required. However, closer involvement of LSC staff may be required for more complex provision that is less amenable to assessment through statistical data. For example, this might include work with disabled or disengaged learners, outreach or first step provision. On-site monitoring should also be a requirement for new providers.
69. There are considerable concerns among providers that LSC staff will not be familiar with specialist areas of provision and will therefore not be competent to make judgements about quality. Staff will need to be competent to judge consistency between the mission of the provider, the particular groups of learners they target and the outcomes they achieve.
70. It would be helpful to be clear about the minimum number of visits to which all providers will be subject. For schools this minimum is identified in the Code of Practice for LEA/school relationships and we would suggest there is a Code of Practice for LSC/provider relationships.
71. Area inspections may form an additional source of information on relative performance. It is not clear from the draft Common Inspection Framework or from the Raising Standards proposals how inspection which examines adequacy will relate to LSC's responsibilities for the quantity and quality of provision. This needs to be clarified.
72. We have already noted that there may be instances of weak provision rather than weak providers. This is more likely within a large provider offering a range of programme areas. Intervention strategies should reflect this.

Q11 Should the current accredited and Beacon status of FE colleges be carried forward until the new arrangements are established?

Tend to agree

73. We believe that an LSC system for accredited or preferred provider status should replace current arrangements as soon as systems can be established. We recommend that Beacon status should be reviewed in the light of the new arrangements.

74. Currently Beacon status for FE colleges is awarded by Ministers. Accredited status is awarded by FEFC against specified criteria. Ministers may wish to consider whether it is appropriate to continue a system targeted at one sector within the new system.
75. The current accredited status should not be withdrawn immediately, although it may be unfair for accredited colleges to receive preferential treatment for funding. They were accredited under a previous system with different quality baselines. They could continue to receive funding to disseminate good practice as long as the FE Standards Fund continues in its present form. They should be given the earliest opportunities to apply for preferred status; but would still be need to be subject to the new system of provider review. A clear timescale (say 18 months) before ending accredited status, would allow time for LSC to determine criteria for preferred status and would allow all providers to have a chance to work towards its achievement.
76. Although the accredited colleges may not be the first to be inspected (on the basis that sound providers currently have a lighter touch), it could be argued that early inspection of some under the new framework would give helpful benchmarks for others to aspire to.

Q12 Do you agree that the award of preferred/approved supplier status should be available across all types of supplier? If so, what benefits should this status attract?

77. The distinction between approved and preferred status needs to be clear. Currently approved status signifies meeting threshold requirements for the ES. We recommend that common criteria should be used by LSC and ES for this purpose. Preferred status denotes levels of excellence. We believe that all providers should be encouraged towards achieving preferred status. Once levels of excellence can be achieved, the costs of LSC processes for review and intervention can be reduced.
78. Preferred status should be awarded locally against national criteria. Those making the decision should be suitably qualified, credible in the eyes of providers, decisions should be moderated, and an appeals process must be established. Care must be taken that criteria do not advantage or disadvantage certain kinds or sizes of provider and should recognise different kinds of learning outcome. Criteria should encourage continuous improvement rather than achievement of a static threshold, with the expectation that standards will rise overtime. There must be processes for withdrawing preferred status if standards fall.
79. There must be tangible benefits to achieving preferred status. Providers could be subject to lighter touch inspection and quality review. They could be given a guarantee of funding for a longer period and a role in supporting other local providers (who may also be aiming for such status). They could be invited by the

LSC to bid for or set up new provision in a programme area or locality, where a need has been identified. They should be expected to network and share good practice.

80. The criteria for achieving preferred provider status should be learner focused, e.g. taking account of how effectively the provider's infrastructure supports the learners' statement of entitlement. There will be clear benefits to the learner, and their parents, where appropriate, and other stakeholders in knowing which are the preferred providers in a locality.

Q13 In what circumstances would it be appropriate for the LSC or ES to invest resources to improve marginal or unsatisfactory provision? How should this be done and how should such investments be safeguarded?

81. The priority should be to support marginal or unsatisfactory provision where there is an identified need, for example in addressing skill shortages or curriculum breadth, and where there are no appropriate local alternatives. Support should only be given against an action plan with clear targets and time limits for improvements. Local LSC staff should monitor developments closely.
82. The needs of the learners should be paramount and there may be circumstances where a particular area, say, foundation studies, requires support across a number of providers. NTOs will also have an important role in promoting improvements in standards in particular occupational areas.
83. There needs to be a support and intervention fund covering the whole sector. FEEDA's experience of the FE Standards Fund is that colleges, particularly those with weak provision, need tailored help and strategies that reach staff at all levels. The DfEE funded Raising Quality and Achievement Programme has provided such support through trained quality improvement teams giving on-site support and targeted support for staff from top management to curriculum leaders. Practical support can also be given in the form of partnerships or mentoring from other providers. A fund should encourage investment in staff rather than capital projects and could include secondments.

Q14 What type of support should the LSC and ES provide to encourage new development and collaboration to improve learning opportunities and the efficient and effectiveness of delivery?

84. To encourage continuous improvement at all levels it is important not to simply reward or support the exceptional and the weakest without addressing the needs of satisfactory providers. This should be part of the LSC role in capacity-building.

85. A post-16 support and intervention fund, as described above, could also be used to improve opportunities. A national fund may need local priorities to ensure adequacy of provision. It will be important to include all work-based providers, and to consider how school sixth forms and other LEA and community provision is included.
86. We agree with government statements that point to the success of local voluntary and community sector providers in reaching hitherto excluded groups. If these providers are to fulfill their potential, consideration should be given to building that capacity through development funds and practical support.
87. Experience in FE has shown that financial incentives can encourage sharing of good practice, particularly where there is competition between local providers. Learning partnerships may be particularly well placed to foster collaborative approaches to staff development at the local level.
88. There is also a need for networks and staff development activities at a regional level, where competition is less fierce, as well as at a national level. To avoid duplication and waste of resources there needs to be national support and information with practical approaches to promoting good practice through a variety of media. Extra support may be needed for the introduction of curriculum change (the GNVQ and Key Skills support programmes provide a well-tried model).
89. New curriculum developments or national skill priorities may need pump-priming and a 'Development Fund' or 'Innovation Fund' may be appropriate to stimulate breadth, as well as high standards of provision. Providers are concerned, however, that this should not be at the expense of core funding.
90. Work based and community providers may require different forms of support, which are cost and time effective and start from appropriate baselines. FEDA has undertaken a needs analysis, *Quality Improvement in the Work-based sector* which indicates the need to tailor support to the characteristics of training providers.

Q15 What additional support is needed during the transition to help suppliers prepare for the introduction of the new arrangements for raising standards in post-16 learning?

91. If the new arrangements are to improve learners' opportunities and achievements, all providers will be faced with significant culture change. The aim is clearly to promote collaboration rather than competition which will require a culture change across the sectors. Whilst the arrangements must build on the best existing practice, all the different sectors will have to adapt and demonstrate a readiness to embrace new processes and give up some familiar ways of working. Small providers with limited staff in management roles will face particular challenges.

92. A programme of development activities should start as soon as possible, to help both providers and LSC and ES staff to prepare for the introduction of new arrangements.

93. This might include:

- Helping providers prepare for self-assessment and for inspection
- Helping providers move to a continuous improvement model
- Training LSC staff in quality issues and in supporting quality improvement strategies
- Training for staff in customer care approaches in relation to the learner entitlement
- Support for small providers in developing systems and strategies for provider review and data requirements
- Support for MIS development
- Development of benchmarking arrangements between like providers or provision
- Establishing networks to foster the sharing of good practice
- Development and distribution of materials for staff development.

94. Support activities should bring people together from a range of perspectives to develop a common understanding of issues and standards and to help to remove barriers. There will also be a need for discrete activities for particular sectors and types of organisations.

95. FEDA has now had its remit extended to embrace all provision funded through the LSC and to pay particular attention to the work based route in the areas of “policy development and implementation; the promotion of continuing professional development; evaluation work; support for providers; development and dissemination of good practice “(remit letter May 2000). We look forward to advising on and engaging in the kinds of support outlined above.