

#### Learning and Skills Council Strategic Framework to 2004 Draft Corporate Plan for Consultation

### Response from the Learning and Skills Development Agency

#### Overview

- We are pleased to have the opportunity to comment on this draft corporate plan and welcome the open and consultative tone of the document. We agree with Bryan Sanderson's foreword which describes the 'massive endeavour', 'tremendous opportunity' and 'exciting prospect' represented by the Learning and Skills Council (LSC). We look forward to contributing the creative energy of the LSDA to delivering the new agenda.
- 2. We strongly welcome the clear statement in the draft corporate plan (page 4) that the individual learner is *'at the heart of the system'*. This will have significant implications for the operation of the Council, for example informing planning processes and the curriculum offer.
- 3. From the detailed response that follows we would like to draw attention to the following points which in our view require further attention:
- The remit letter to LSC from the Secretary of State placed great emphasis on the role of learning in social and economic regeneration, placing particular stress on the importance of community learning and on securing equality of opportunity. This motivating and inspiring view of education and training as a means of changing life chances and expectations should be prominent in the LSC's mission and vision.
- An excellent system of communication will be crucial to the success of the LSC. This will need to engage the LSC and its national board, local LSC staff and Councils, learning providers and other key partners in policy development. This will be essential to prevent fracturing between national and local LSCs, and to engage the effort of partners.
- The key partners for the LSC in delivering its objectives are the learning providers who work directly with learners. The development of a secure and confident provider infrastructure with a shared sense of direction and priorities should be a very early priority.

#### Section 1 Does this section provide a useful context and identify the key issues facing the Learning and Skills Council?

#### Context

- 4. We agree with the analysis of the context set out in the draft corporate plan. As this states the LSC is operating in a context of enormous change. Moreover the Learning and Skills sector is particularly susceptible to changes which result from the performance and priorities of schools, of the labour market and of higher education. A key challenge therefore is to maximise the LSC's capacity to plan its contribution through excellent partnership working and through analysis of trends and initiatives in these adjacent contexts.
- 5. We also agree that lack of basic skills will create an increasing barrier to effective participation in the labour market and that the pace of technological development will mean that workforce development will become increasingly vital if companies are to maintain their competitive edge. These trends increase the potential for the social and economic exclusion of those people lacking basic skills and not in employment.

#### Key issues

- 6. We strongly welcome the dual focus in the remit letter and in the corporate plan on the skills for economic development and on education and training as a route to social inclusion. We believe that engaging those who are most disadvantaged in terms of their economic prospects and those people at risk of social exclusion, and enabling them to reach their full potential, will be the greatest and most important challenge for the LSC.
- 7. We warmly welcome the statutory duty on the LSC to encourage participation by both individuals and by employers. The development of an effective demand-side strategy will be key to LSC success. This is likely to require a segmented approach to identify the triggers that stimulate demand among identified groups and individuals. LSDA is currently carrying out comparative international research for LSC to identify leading edge practice to stimulate demand. We believe that strong branding of education alone will not necessarily engage potential learners. It must be clear how learning can meet the specific needs and aspirations among potential learners, employers and other groups... In addition, the other elements that determine participation such as funding and accessibility, must be in place.
- 8. We believe that successful delivery of the LSC's remit will require effective working relationships between the range of providers delivering LSC-funded provision. Providers, particularly colleges, have been through a period of intense competition and although there are examples of successful partnership, this is not the norm. Currently providers are uncertain about the new arrangements and about their long-term role in the new sector. This anxiety is fed for example by uncertainties about a range of issues:
  - whether large institutions will flourish or whether the context will be more favourable to smaller differentiated providers

- whether sub-contracting between colleges and small community and voluntary sector and training providers will be acceptable
- whether longer-term contracting for training providers and the community and voluntary sector providers will be introduced.
- 9. Therefore providers feel uncertain about how best to develop their business to secure their future in the new sector. We believe that clearer steers about how the LSC wishes to see the provider infrastructure develop would assist them in taking a strategic and longer-term view of their role. LSC needs a strong provider network, confident in its contribution to the endeavour.

#### Section 2 Do you feel the Council's vision and mission capture the scale of the task the Learning and Skills Council faces? Are they achievable?

- 10. We believe that the LSC has the potential to transform expectations and life chances. The power to fund first step and innovative learning opportunities and to secure appropriate provision for those individuals and communities who have not benefited from education and training in the past make this possible. We would favour a stronger focus in the mission and vision statements on addressing disadvantage and securing equality of opportunity. These permeate the Secretary of State's remit letter and have helped to inspire support for the Learning and Skills Act.
- 11. The vision that by 2010, young people and adults will have knowledge and productive skills matching the best in the world, indicates the long timescale that may be needed. We welcome this realism. However, international comparisons are hard to make, and specification of the vision may need to be more closely defined.

#### Section 3

# In the light of the criteria we have set out, have we identified the right five outcome targets? If so, what interim numerical targets for 2004 should we adopt, in the version of the plan which we will finalise in the summer?

#### Accountability for targets

12. In order for accountability to be clear, the targets should focus primarily on that which is the direct responsibility of the LSC, and within its power to deliver. If responsibility is shared for targets between different agencies, there is a danger that accountability will be blurred, and effort dissipated. We do not therefore support the criterion which states that:

Different agencies and different levels of the education and training system should be able to share accountability and take credit for their own contribution.

13. While alignment of targets with other agencies could assist their achievement, it may muddy lines of responsibility. We therefore favour an approach whereby the contribution of individual agencies or organisations to the achievement of targets is separately identified.

#### Achievement targets

#### Level 2

- 14. A target is proposed for the numbers of people with level 2 achievement at age 19. This does not relate to the volume of level 2 achievement delivered through LSC-funded provision. Achievement of the proposed target will therefore depend largely upon the performance of schools pre-16 in ensuring young people reach level 2. We believe that achievement to level 2 at age 16 should be a government target, and could be a key measure of school performance.
- 15. The LSC sector has a significant role in assisting those learners who have left school without achieving level 2, and we believe that a target should relate to this. However, consideration should be given to defining the target in terms of the numbers achieving level 2 through LSC-funded programmes. This would require analysis of the current achievements of level 2 at age 16 to set a realistic but demanding target. Consideration could also be given to including a target for 19 year olds achieving level 2 through LSC-funded provision.
- 16. In order for targets to be easily understood, we believe that they should relate as closely as possible to people's experience of normal or desirable patterns of achievement. As already stated, a target at 16 for level 2 achievement would be meaningful.

#### Level 3

- 17. The draft corporate plan proposes a target for level 3 achievement at age 21. We believe that a target for 18/19 year-olds achieving level 3 would be more relevant, relating to a desirable pattern of achievement at this age. This could be supplemented by a target for level 3 achievement at age 25 or perhaps more appropriately at 30 to relate to the government's target of enabling half of young people under 30 to progress to higher education. A level 3 target could also help to redress the drop in level 3 vocational work in colleges. We see less justification for a level 3 target for 21 year olds.
- 18. While we welcome the importance given to adults suggested by the target 'to raise achievement of the entire adult population' we fear that the target may be unrealistic. We believe that it would be more appropriate to set a target for raising adult participation. Provided mechanisms are in place to ensure that learning opportunities are of high quality we believe this can achieve the underlying objective of such a target.

#### **Basic skills**

19. The corporate plan consultation seeks views on the targets for basic skills. The grant letter to the LSC in December 2000 set a target of 750,000 individuals to improve their basic skills by 2004. Since then, the DfEE's national strategy for

improving adult literacy and numeracy skills<sup>1</sup> has been published which breaks down into more specific groups the 750,000 individuals referred to in the Grant letter to the LSC. Since the basic skills strategy is to be taken forward through the DfEE's Adult Basic Skills Strategy Unit we believe that LSC should take advice from this Unit on the detailed targets to be set for delivery through LSCfunded provision.

#### Achievement is not just about qualifications

- 20. The consultation paper refers to the 'need to develop simple ways of calibrating' learning not leading to formal qualifications. The Secretary of State's remit letter to the LSC emphasised the vital importance of first step opportunities and learning that is for work and for citizenship. He referred to the importance of targeting adults from disadvantaged backgrounds and who have not been in any learning during the last 3 years. This priority must not be undermined by targets that only measure achievement by qualifications. Reaching the more disadvantaged learners, as the remit letter recognises, will require innovation and new approaches which must be valued and funded though they may not lead immediately to qualifications.
- 21. The FEFC funded Non-Schedule 2 projects provide evidence of the value of nonaccredited outcomes. In addition they demonstrated the capacity of FE institutions to work in partnership with those in the community, those working with ex-offenders, mental health, social services, drug rehabilitation centres, the homeless etc to bring the fragile, hard-to-reach members of society into learning. These programmes were designed to be local, supportive and of short duration and accreditation was not a requirement.
- 22. Their success was demonstrated by the enrolment of 22,000 learners in the first year of the projects. Many were effective in tackling Basic Skills. Other outcomes included progression not only onto accredited programmes but also into local community work and into neighbourhood renewal schemes, and a few directly into employment. If LSC is to make its contribution to the agenda for neighbourhood renewal, these wider benefits of learning need to be taken into account these can include social interaction, community involvement, building of self-confidence, building of social capital.
- 23. Work by LSDA and NIACE has suggested that there are ways in which learning can be evaluated which do not result in a formal, accredited qualification. The NIACE research report<sup>2</sup> puts forward proposals for a framework of criteria that can be used to determine the eligibility of non-accredited learning for funding. Research also indicates that learners can contribute to devising the criteria and that their needs and perceptions are crucial in considering how criteria might be used.
- 24. The LSDA-NIACE research project *Recognising and Validating Outcomes of Non-Accredited Learning* has concluded that there are many and diverse ways in which learning and outcomes can be recorded but an essential component of this

<sup>&</sup>lt;sup>1</sup> Skills for Life: The national strategy for improving adult literacy and numeracy skills, DfEE, March 2001

<sup>&</sup>lt;sup>2</sup> Squaring the Circle, Cheryl Turner, NIACE, May 2001

is the identification of Learning Objectives which should be understood as the particular goals that the tutor will seek to confirm with the learners. These learning objectives need to be negotiated with the learners and the learners themselves need to reflect on their own learning and progress. This can be formalised into a system which provides robust evidence of learning having taken place<sup>3</sup>.

- 25. We believe that this work provides an important foundation for developing LSC policy in this area. However, further work is needed on the following:
  - how to measure, as distinct from verify, non-accredited learning
  - how to take account of soft outcomes
  - how to devise benchmarks to allow for reliable comparisons between providers
  - learners' perceptions of attempts to record and validate what they are doing.

26. We look forward to working with the LSC to take forward this agenda.

#### Participation targets

#### Young people

- 27. The consultation paper proposes participation targets for 16-19 year olds. Current patterns show a significant drop in participation between 16 and 19. At the end of 1999, 86.4% of 16-year-olds were in education and training, this drops to 79.9% of 17-year-olds and 60.2% of 18-year-olds. These suggest that a disaggregated analysis of participation by different year groups may be needed.
- 28. Consideration of targets and participation strategies for this age group should be based on detailed understanding of their participation patterns. Changes in the national curriculum and the 16-19 curriculum (curriculum 2000) could have a significant impact on patterns of participation post-16. The option for learners to leave with qualifications after one year of study, and lifestyle pressures to combine work and full- and part-time study, may have a significant impact.
- 29. Therefore we believe that patterns of participation should be monitored and learner motivations researched in order that the attitudes and ambitions of this complex age group are better understood. Education Maintenance Allowances are likely to impact on these patterns and should also be considered in the research. The proposed national research centre for Learning and Skills will want to address this issue.

#### Adults

- 30. We are concerned that there is no target for participation by adults. We believe this will be particularly important given the difficulties discussed above of measuring achievement that does not lead to qualifications, and the importance of engaging new learners through first step learning without threats of failure.
- 31. The grant letter to the LSC stated that there would be 625,000 more adult learners in 2001/2 compared to 1997/8 and that 65% of that growth would be

<sup>&</sup>lt;sup>3</sup> Recognising and Validating Outcomes of Non-accredited Learning, LSDA, May 2001

among disadvantaged people. If this current consultation is to replace the target set out in the grant letter, then a target directly related to adults and to disadvantage should be established.

- 32. The figures in the grant letter are hard to relate to trends of growth in participation for the whole of the new sector due to lack of data. However, in the FE part of the sector where data is readily available, growth in adult enrolments between 1997/8 and 1998/9 was about 60,500 of whom 20% attracted the widening participation factor. If growth were maintained at this level during the period proposed in the grant letter (1997-2002) it would have reached around 300,000 additional adults.
- 33. We recognise that Ufi is a key element of the government's strategy to increase adult participation and will have a significant contribution as it becomes fully operational. Even so, the target of 650,000 new adult learners was extremely ambitious. We therefore welcome reconsideration of the numerical target.
- 34. We strongly support the implication in the Grant Letter, referred to above, that participation by disadvantaged individuals should be a primary concern. The inclusion of a funding element related to disadvantage will provide an incentive to providers and will enable performance to be monitored. Consideration should be given to whether a target should be set for specific kinds of disadvantage (for example, lack of qualifications, social deprivation, worklessness) once patterns of recruitment across the new sector are known. We believe that local LSCs, through their planning processes, will need to set specific targets for age, gender, disability and learning difficulties, ethnicity and geographical area.

#### **Quality and effectiveness targets**

- 35. We welcome the intention to seek systematic feedback from learners about quality of provision to complement numerical data and information obtained through inspections.
- 36. Customer satisfaction measurement is often included as a key performance indicator and forms an integral part of the balanced scorecard approach adopted in many leading organisations. We have done significant work related to measuring satisfaction. Our Raising Quality and Achievement programme is currently providing both a student and staff satisfaction service to the further education sector and the take up of this service suggests that much of this sector is aware of the benefits of understanding their customers. We do not have hard evidence of the extent to which this is true of other providers in the Learning and Skills sector.
- 37. From our work, we can identify a number of key issues that need to be taken into account:
  - The measurement should not be considered an end in itself but the resultant measurements should inform management planning and service improvement and development.
  - Staff should be included as a stakeholder group when measuring and monitoring feedback. Recent research we carried out suggests that there is

clear correlation between student and staff satisfaction in colleges and that satisfaction of students and staff is higher in Beacon Colleges. These findings are backed by marketing and customer research across all occupational sectors.

- It will be necessary for organisations to have quality tools and techniques at their disposal for them to identify and understand the causes of dissatisfaction, for example:
  - Use of customer groups
  - Good complaint systems
  - Problem solving and analysis techniques
- Using customer satisfaction measurement as published performance indicators can make them less effective management tools as organisations will tend to focus less on the cause of dissatisfaction and more on how to improve the public perception of satisfaction levels. Colleges that currently undertake considerable monitoring of satisfaction may decide that it was in their interest to carry out only prescribed monitoring and to concentrate on getting the "best results" rather than the most accurate and useful information.
- The LSC should be wary of publishing data from individual, identified providers, as this will skew results. Instead it should require evidence of both monitoring satisfaction and of how this monitoring impacts on management planning as part of both self-assessment and inspection.
- 38. LSDA would be pleased to work with the LSC to support development and implementation of these proposals.

#### **Section 4**

#### Is the suggested model for a local strategic plan, with its three integrated strategies, helpful? Do you have any other suggestions of how the Learning and Skills Council can secure cross-agency support?

- 39. We are conscious in commenting on this section, that the new Learning and Skills sector is a complex and diverse sector. Strategic planning to take account of the range of needs and provision will therefore be a very substantial task. Given the challenges of start-up activity in all 48 LSC offices and the necessity to create new systems, the strategic planning operation is likely to come under strain during the first year of operation.
- 40. We welcome the aim of balancing top-down and bottom-up processes. This should enable realism from the bottom to be combined with ambition from the top. Our reservations lie in the time required to carry this out as described, particularly given the necessity of co-ordinating plans with other organisations such as RDAs and local authorities. Given the statutory role of RDAs in preparing a skills strategy, their links with industry sector interests and higher

education, we believe that a system for regional co-ordination of LSC planning needs to be considered.

- 41. A significant challenge for local LSCs will be to secure the meaningful engagement of providers in the process of target-setting and strategic planning in order that proposals are realistic and that providers are committed to delivering them. LSCs will also need to listen carefully to feedback and messages from Learning Partnerships and from local strategic partnerships as part of the strategic planning process. This will enhance their credibility with providers and hence secure more meaningful engagement with them. Other key partners should include the National Training Organisation (NTO) network, (including relevant NTOs in the area as well as the NTO National Council regional contact), relevant trade unions and large employers.
- 42. The model proposed for strategic planning provides a helpful starting point which can evolve as practice develops. The three elements to the planning process provide a useful means of dividing up the task of planning. Each element of the task will be demanding in different ways.

#### A local skills strategy

- 43. Labour Market Information (LMI) is a key component of the local skills strategy. One of the original triggering factors for creating the LSC was to rationalise the collection, provision and analysis of LMI and eliminate the duplication of effort that was taking place between TECs, local authorities, regeneration agencies, regional bodies, etc. It is important that the range of functions in relation to LMI are made clear:
- collecting LMI data, for example, through workforce surveys, longitudinal studies, obtaining demographic data, counts of school age cohorts, etc
- providing validated reports and analyses as base documents to be used confidently by planning and provision authorities of any kind
- having a research function to look at relevant LMI provided above and drawing conclusions for the locality, for a given provider, etc.
- 44. It needs to be clear how the LSC interacts with any or all of these functions, and how it interacts with bodies that already undertake them. LMI is not the only source of information for a skills strategy, there is also the economic analysis of global, national, regional and local industrial trends (DTI and RDAs offer this), and the interpretation of these trends into skill needs.
- 45. The LSC local skills strategy therefore needs to build on and utilise the existing systems and avoid recreating them from scratch. In particular they need to use:
- RDA Regional Skills Strategies
- NTO Skills Foresight plans
- NTO Skills Dialogues with employers
- NTO Sector Workforce Development Plans

46. In addition to identifying LMI, overall economic trends and the skills needs, shortages and gaps, *learning needs* must be identified. This is a key role for the

LSC. In addition, it will then need to identify the gaps and shortages in provision and match skills needs to learning programmes. While the LSC will be accountable for implementing the skills plan, the key responsibility of employers, Small Business Service (SBS) and NTOs will be to make clear demands of the LSC to ensure that provision is relevant and meets their needs. Given that the SBS is relatively newly established and NTOs are likely to be undergoing reorganisation as a result of the recent review of their role, time may be needed to secure their full engagement.

#### A local participation strategy

- 47. We support the development of a local participation strategy. This will be a crucial focus for the LSC. It should be informed by the experience of practitioners in the area and their knowledge of local communities, including local authority expertise in community planning activity. We welcome the emphasis on analysis of participation by age, gender, disability and learning difficulties, ethnicity and geographical area. Analysis of these patterns of participation should provide a basis for measuring performance of providers and of the LSC.
- 48. Important work has already been done in the FE sector by John Tomlinson on Inclusive Learning<sup>4</sup> and Helena Kennedy QC on Widening Participation<sup>5</sup>. Their reports have researched and explored the requirements to achieve these two vital goals, and provide important evidence for the LSC. For example, they have examined the need to fit provision to the needs of the individual learner, have noted the dangers of funding encouraging recruitment of those most likely to succeed, and explored approaches to securing a flexible curriculum. The LSC can draw on this extensive experience to achieve the objectives of inclusivity and equal opportunities.
- 49. The capacity of the LSC to develop a participation strategy may be assisted where the Learning Partnership is well developed. However, Learning Partnership capacity is currently very uneven. We believe that if they are to play a significant role in new arrangements, that support is needed to develop their capacity and to enable exchange of best practice between regions.
- 50. The local participation strategy may reveal a pattern of demand which is not consistent with the outcomes of the skills strategy. In other words, demand may not be in the areas of skills that the economy requires. We recommend against seeking to fit individuals to prescribed provision. This would be at odds with a system that aims to place the learner at the heart of the system. We strongly believe that for those who have low level skills, the primary goal should be to encourage participation in active learning, rather than attempting to steer them into specific areas of learning.
- 51. Where there are skill needs in the local economy that do not attract recruits, the industry sector concerned may need to consider incentives and strategies for improving recruitment which go beyond education and training opportunities. In addition the participation strategy needs to seek to actively influence how advice

 <sup>&</sup>lt;sup>4</sup> Inclusive learning: report of the learning difficulties and/or disabilities committee, FEFC, 1996.
<sup>5</sup> Learning Works – Widening Participation in Further Education, FEFC, June 1997

and information agencies interact with schools, providers and local employers to ensure that learners are aware of the range of options. Ensuring good workbased routes locally depends on the active participation of business and education through the NTOs and Education Business Link Organisations.

#### A local learning strategy

- 52. The learning strategy will be at the heart of the task of strategic planning. We agree that the achievement of the *'right combination of quality, flexibility and choice'* will be a key challenge (draft corporate plan, page 12). Such features will flourish best on the basis of provision which is coherent in scope and range, relevant in offer and within which progression routes are clearly delineated and recognised, offering progression to, from and within the LSC sector. Progression routes can be discussed and agreed with local partners including Higher Education, NTOs and SBS. In particular, providers will need flexibility to respond to actual demand which despite the best analysis may differ significantly from identified skill needs in a region. We therefore see dangers in a contracting system which specifies volumes of provision and specified programme areas without freedom for virement.
- 53. We note reference to 'contractual and non-contractual influences' (page 12). We would urge that effort be made to avoid a culture which relies unduly on contractual agreements to secure change. This may secure minimal compliance as compared to active partnership in a joint endeavour.
- 54. Data lag is likely to be a key issue in the preparation of the learning strategy. For example, in relation to the planning of 16-19 provision, LSCs will need to get robust data from former FEFC records and LEAs for school sixth forms in order to be able to make informed judgements about planning for the future. In the current system the validated data from Individual Student Records for 2000/01 enrolments participation and achievements will not be available until May 2002. LSC planning systems will need to be prepared to take account of such practical limitations in the short-term while developing improved systems as a matter of urgency.

#### Section 5 Does this section clarify the structure of the Learning and Skills Council and help define its relationships?

55. We welcome the aim to combine 'a national programme and national resourcing with local flexibility and initiative' (page 15). However, we believe this will be a difficult balance to achieve. We recall that an ambition expressed in early statements about the proposed post-16 review, was to create a fair national system which offered an entitlement to a range of provision which was not dependent upon where people live. We believe that this should continue to be a key aim of the new system. The inequality in access to provision which preceded the Learning and Skills Act was one of the greatest weaknesses of the old system.

- 56. If policy is to be set nationally by the LSC Board, effective communication to the local arms will be vitally important to ensure that policies are supported and understood at the local level. If this is not achieved, interpretation of policy could vary greatly across LSCs. We believe there is a latent danger, given the powerful membership of local Councils, that they may wish to set policy for their patch to an extent that is not consistent with the national unitary status of the LSC. The parameters of their role need to be set out clearly to manage the expectations of members and avoid conflicts between local and national levels. We welcome the commitment (page 20) that *'national and local accountabilities for functions and activities'* will be established in the revised Corporate Plan for 2002-5.
- 57. We welcome the establishment of the national committees for young people and for adults. We agree with those agencies that have suggested that similar structures at local levels may be desirable. Certainly we believe there will need to be very effective means of ensuring that local LSC staff, Councils and providers understand polices developed and have a means of contributing to the policy-making processes.
- 58. Contribution to policy-making from the local level will help ensure that policies reflect the practicalities of local LSCs and secure greater commitment to policies. Within the remit of the Adult Learning Committee, there are fears that the focus on adult and community learning may be slight compared to that on workforce development. Effective local engagement in policy development could help to ensure due consideration is given to the range of interests.

#### **Section 6**

## Is the list of key groups comprehensive? How do you feel the relationship between the Learning and Skills Council and its partners could be developed, both at local and national levels?

- 59. We believe that the relationship between the Neighbourhood Renewal Unit (NRU) located in the Department for Environment, Transport and Regions (DETR), and the LSC will be a critical one. The NRU is charged with delivering the skills element of the neighbourhood renewal strategy and will need to work closely with LSC.
- 60. Our main concern is not that the list is comprehensive, but that priorities are clear for the initial phase of operation. Alongside the extensive tasks of setting up a new organisation of this magnitude and complexity, the range of key partners is daunting and it is likely to be beyond the capacity of LSCs to develop effective relationships with all these in the short-term. It may be helpful to suggest the primary function of the relationship to each partner for example whether information sharing, delivery, approval of planning proposals, etc. This could help to rationalise processes.
- 61. As indicated earlier in this response, we believe that the LSC's key partners will be providers. The delivery of LSC objectives will depend essentially on the engagement of the full range of providers. Their commitment will be fostered

through clear policies, a strong vision of how the provider network should evolve, and clarity of operating systems that allow long-term planning and the development of stable relationships. This will be key to the quality of the sector.

#### Further consultation Do you have any views on how the areas identified for further consultation should be developed?

62. We welcome the notification of consultations that the Council intends to initiate over coming months. We would recommend that as work is started in these areas, a contact point at LSC, both locally and nationally, is given to encourage contributions at a formative stage.

#### Workforce development

63. We note that Skills/Workforce Development Strategy is identified as a key priority. However, the Performance and Innovation Unit at the Cabinet Office is currently running a major project on this issue, working across government departments. We recommend that the LSC resources are used to work with this project rather than to generate a separate body of work. Given the demands on LSC staff at this time, this would be an efficient means of progressing the work.

#### Provider infrastructure development

64. We believe, as described earlier, that currently there is uncertainty among providers about how to position themselves and develop their business in the new context. A paper setting out for consultation a view of the longer-term shape of the provider infrastructure and the roles of the public, private, voluntary and community sector providers would we believe be welcome. This would help to secure a national view and the basis for consistency of approach between LSCs.

#### **Equal opportunities**

65. We have consistently welcomed the focus on equal opportunities in the Secretary of States remit letter and in other documents relating to the LSC. We are very concerned that this focus does not get lost, and development of proposals for how the LSC might develop practice would be helpful.

#### **Neighbourhood Renewal and LSC**

66. It is essential that the skills element of the Neighbourhood Renewal Strategy taken forward through local authorities and local strategic partnerships is coordinated with the efforts of LSCs. For example, Learning Partnerships must relate to local strategic partnerships, and community planning processes need to be choreographed with LSC planning. We believe that development and publication of case studies of good practice together with operating principles for debate could help to maximise use of resources and impact at the local level.