Raising Standards in Post 16 Learning Consultation
Response from the Association for College Management

The Association for College Management is an independent professional association and trade union representing and supporting managers in post-compulsory education and training. The Association is pleased to respond to the consultation on this vital new element in the post 16 education and training reforms. What follows is based on the views of our members – college managers who have substantial experience in managing quality improvement and managing change.

Key Observations:

- The Association welcomes the commitment to treat all providers with the same degree of rigour in assessing quality.

- We raise concerns about the seam between the work of the inspectorates and the QI work of the LSC / ES, and the possibility of unhelpful overlap.

- The effectiveness of the LSC Quality Improvement arrangements will be a function in part of the quality of LSC staff in this area. We recommend that careful thought be given to the training of these staff; that training should articulate closely with the training of OFSTED and ALI inspectors.

- We support investment in the development of common national information and communication systems. The new information system should capture information in such a way that data can be drawn down from a single database for a range of requirements. The key objective here is to simplify and reduce bureaucracy. We recommend that new systems are trialled before being widely launched – untested systems may bring difficulties that will add pressure to the change process.

- A transparent process whereby agencies can exchange information and data electronically will aid the reduction of bureaucracy and free resources to be channelled directly to learning.
• We remain concerned about potential incoherence between the systems of the LSC and those of the Employment Service. We recommend that these agencies should achieve a single unified system for provider purposes.

• We anticipate that common and coherent arrangements will produce benefits in research, models of good practice, and training and development opportunities.

• We welcome the reduction in administration implied by the rationalisation of arrangements. This will release resources that can flow directly to learning.

• We welcome the emphasis on self assessment and the integral part that self assessment will play in the LSC / ES processes of review and continuous improvement.

• We support the continuous and cyclical nature of the proposed QI processes and their potential to ensure a steady, day to day, on the ground focus on quality improvement.

Design Principles

Q1  Do you agree these are the key design principles to underpin the development of the arrangements for raising standards in post-16 learning? (para 8) /Chapter 1

| Strongly agree | ✔ |
| Tend to agree |   |
| Neither agree nor disagree |   |
| Tend to disagree |   |
| Strongly disagree |   |
| Don’t know |   |

The Association for College Management supports the design principles described in the document. In particular we welcome the principle ‘all suppliers of education and training will be subject to the same degree of rigour in assessing the quality of their provision’ which allays our fears arising from earlier consultation documents.
Raising Standards in Post 16 Learning

Q2 Do you agree that these proposals provide clear responsibilities for those involved in raising standards in post-16 education and training? (paras 9 to 17) / Chapter 2

Strongly agree [ ]
Tend to agree [ ]
Neither agree nor disagree [ ]
Tend to disagree [ ]
Strongly disagree [ ]
Don’t know [ ]

ACM:

Role of Providers

We agree that the principal responsibility for improving the quality of provision should lie with providers. We are convinced this is the most effective route to raising standards as without organizational ownership and responsibility, externally imposed controls will not be entirely successful. Raising standards is top of the development agenda in all colleges at present; colleges managers already take the lead in developing internal strategies around self assessment, quality improvement and staff training and development: key factors in excellence. The development of FENTO national standards and teacher qualifications based on those standards is welcomed, as offering an excellent platform for these processes.

Role of the LSC

We welcome the promise of common systems, and greater consistency and coherence. The sector has long argued that the plethora of funding, inspection and monitoring systems in colleges, and their associated administration have absorbed resources that could have directly benefited learners. Common systems will also ensure the greater transparency necessary for comparability.

The document states that ‘The LSC will have duties under the Learning and Skills Bill to secure ‘proper’ facilities for the education and training of 16 – 19 year old young people. ‘Proper’ facilities are defined as those of sufficient quantity and adequate quality to meet the reasonable needs of young people’. In the view of the Association the reasonable needs of young people (and indeed adult learners) go beyond the provision of their core learning programme and extend to support and facilities including advice and counselling, personal development opportunities such as sport and cultural events, learning centres, libraries, and a general environment which is safe, stimulating and respectful of all staff and learners. These factors need to be considered in assessing the adequacy of provision.
The Association is concerned that the primacy the LSC is required to accord to provision for younger learners, does not result in the ghettoising of adult learners into second class facilities through a lack of funding. The responsibility placed on the LSC to promote lifelong learning would seem to be undermined from the outset if this were the case.

The different status accorded to academic and vocational learning is deeply entrenched – and yet increasingly incompatible with the skills needs of a knowledge based economy. We welcome the responsibility placed on the LSC to promote equivalence of opportunity, quality and value, regardless of the learning route. The strong emphasis throughout the document on equal opportunities is fully supported by the Association.

Role of the Employment Service

We welcome the promise of maximum coherence between the arrangements of the LSC and those of the Employment Service. However the principle of maximum coherence is one thing and the reality another. The devil is in the detail, and unfolding arrangements will need to be carefully monitored to ensure consonance. Ideally a unified administrative system should be developed.

LSC and ES - Contracting Arrangements

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? (paras 21 to 23) /Chapter 3

- Strongly agree
- Tend to agree ✓
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don’t know

ACM: We agree that the local LSCs should contract directly with providers for the vast majority of provision. However we are pleased to note that advice in our response to an earlier consultation document – that one level of sub-contracting should be permitted where it demonstrably adds value – has been heeded. This will ensure an avenue for innovation. The arrangements spelled out in the documents to cover such circumstances are clear.

We welcome the arrangements that enable employers who have contracted directly with the LSC to arrange for some elements of training to be delivered by
other providers. This is practical and realistic. Again this will support innovative initiatives. We welcome too the ‘one stop shop’ for national and multi site employers.

We recognize the need for transition arrangements with LEAs while a drive on information collection enables a fuller picture of Adult and Community provision to be developed.

Requirements of Suppliers

Q4 Do you agree with the requirements of suppliers and do they focus effectively on raising standards? (para 26 to para 30) /Chapter 3

Strongly agree ☐
Tend to agree ☑
Neither agree nor disagree ☐
Tend to disagree ☐
Strongly disagree ☐
Don’t know ☐

ACM:

Table 2 helpfully maps the LSC / ES quality requirements against the indicative evidence to inform LSC and ES assessments. The detail of the indicative evidence is useful and well focused on raising standards.

‘Table 2’, continues the document, ‘describes the position for FE colleges and work-based learning suppliers, and the systems, information and records which the LSC and ES will look at to obtain evidence that their requirements are being met.’ Is the implication here that other providers, for example private training providers, will be subject to different quality requirements? We would appreciate clarification on this point.

Table 2 is also helpful in attempting to map the connectivity between the responsibilities and requirements of the inspectorates, and the responsibilities and requirements of the LSC / ES. We welcome the emphasis on self-assessment in the latter while remaining concerned about its low profile in the former.

In our response to an earlier consultation we expressed our anxiety about the separation of inspection from quality improvement, mainly on grounds of the need for a seamless relationship between these two processes, maximum impact on quality, and minimum wasted administrative resources. The following statement in the document ‘The LSC and ES will seek much of this evidence from suppliers, but will not do so in a manner which amounts to inspection by the
**LSC/ES’** does little to allay our fears. It is clear that much of the indicative evidence required by the inspectorates will also be required by the LSC. It is essential that the requirements of the inspectorates, the ES, the LSC are developed in such a way that they are identical wherever possible. It is pointless to free colleges from the yoke of the monitoring demands made by the present plethora of funding and inspection bodies, only to replace them with a new set of diverging demands.

Q5 Do they favour any particular types of suppliers at the expense of others? (para 26 to para 30) / Chapter 3

- Yes [ ]
- No [ ]

ACM: To answer this we need clarification on the question above about the implication in the document that these requirements pertain only to colleges and work based providers.

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? (para 27) / Chapter 3 and appendix 2

- Strongly agree [ ]
- Tend to agree [ ]
- Neither agree nor disagree [X] [ ]
- Tend to disagree [ ]
- Strongly disagree [ ]
- Don't know [ ]

ACM: Students in most colleges currently receive a student handbook, or a student contract at the outset of their programme that contains many, often all, elements of what is proposed here. Such a document is commonly an important element in the induction programme for the learner. It would be sensible to build on this good practice. In our view the kind of 'statement' that is proposed is more helpful to the learner if it is linked to the relevant learning context. A national, general document may be too abstract. However it would be helpful to integrate a common national statement of entitlements for learners of all ages into ‘local’ handbooks.
Q7 What are the key issues to be addressed in developing common measures and evidence portfolios for the LSC/ES and other national agencies to inform quality monitoring arrangements? (para 9 and para 31) / Chapter 3

The key issues are:

- The common measures should, in totality, be a true reflection of quality. To this end a measure of distance travelled must be developed.
- In addition to distance travelled / added value, published information about achievement must find ways of expressing:
  - Partial achievement
  - The outcomes of non-accredited achievement
  - The complexity of part time modes of participation
  - Distinctions between the achievements of full and part time learners
- The measures should be common, with minimal variation between national agencies.
- The maximum use should be made of electronic communication technology.
- Information should be shared / accessible to national agencies in such a way that does not require providers to supply the same information to a variety of agencies. We welcome the development of a national database that enables the sharing and exchange of information between agencies.

Q8 Do the proposed performance indicators provide an appropriate base to assess quality and continuous improvement effectively? (para 36) / Chapter 3

Yes ☑
No ☐

The Association welcomes the prominence accorded to relevance – that is the match between provision and need / demand.

Distance travelled is an essential performance indicator, and needs to be included in the category ‘relevance and achievement’.

Financial probity should be included as a performance indicator, and should be tightly enforced.
The proposed performance indicators are generally a good basis on which to assess quality and continuous improvement effectively.

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? (para 39) /Chapter 3

Very useful
Useful
Not useful
Don't know

Comparative performance information and benchmarking are essential elements in the quality improvement process, especially in terms of setting targets, sharing good practice, and informing learner choice. However such data is only useful – indeed is only valid - where it reflects what it claims to measure. It is important therefore that provider institutions contribute to the design and characteristics of this process so that they have confidence in the validity of the data, and the messages that the data sends to learners, funding bodies etc.

The LSC and ES Supplier Review Processes

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? (paras 40 to 44) /Chapter 4

Yes
No

The Association supports the proposed supplier review process. For the sake of clarity and lean administration it is important that it is clearly articulated with the inspection process. A continuous review cycle that is bedded in providers’ internal quality improvement processes could be more valuable than ‘hit and run’ inspections which might tempt some providers to prepare for inspection rather than improve quality.
Q11  Should the current accredited and Beacon status of FE colleges be carried forward until the new arrangements are established? (para 47) /Chapter 4

Yes ☑
No ☐

ACM: These current kite marks are considered valid and well earned and there is no evidence whatsoever that they should be withdrawn.

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? (para 48) /Chapter 4

Strongly agree ☑
Tend to agree ☐
Neither agree nor disagree ☐
Tend to disagree ☐
Strongly disagree ☐
Don’t know ☐

ACM: Approved supplier status should be available across all types of supplier. The benefits of this status should bring:

- Light touch inspections
- Light touch review
- Three year budgets
- Opportunities for expansion
- Extra resources to promote good practice

Investing to raise standards

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? (Paras 54 to 56)

/Chapter 4

ACM: It would not be appropriate where an institution can identify the resource from within its own budgets: unsatisfactory provision is not invariably the outcome of inadequate resources. Resources should only be invested if there is well grounded confidence in the capacity for improvement, and where there is a clear and well developed strategy for improvement. (This would suggest that providers with a long term and across the board record of poor management should not receive such investment as there is unlikely to be the confidence that it would be used effectively.) There must be rigorous monitoring and regular short term reviews to ensure that progress is being made.

There needs to be caution with regard to the last resort measure of closing providers down. Consideration must be given to the social impact on communities, and the related issues of adequacy and sufficiency.

However in the view of the Association neither in these nor any other circumstances should private for-profit training providers be eligible for capital funding. Capital funding by central government represents an investment from the public purse, and public ownership of the infrastructure bought by such investment must be secured.

Promoting Good Practice

Q14 What type of support should the LSC and ES provide to encourage new developments and collaboration to improve learning opportunities and the efficiency and effectiveness of delivery? (para 59) /Chapter 4

ACM: High quality provision can be promoted through:

- A training and development entitlement for all college staff, articulated to raising the quality of service
- Maximising the value of the FENTO standards by cementing them into the foundation of training and development programmes, and by encouraging and broadcasting standards-based good practice.
- Excellent training opportunities – conferences, workshops, seminars, mentoring, work shadowing.
- Conferring an LSC kite mark on approved research, good practice guides, published models etc.
• Maintaining a database of all approved publications, with universal electronic access
• Continuing the standards fund model of supporting the dissemination of best practice (reports on such projects could be placed on the dbase described above).

Colleges regularly collaborate with other institutions to extend the range or improve the quality of learning opportunities. The local LSC planning process should also be alert to the potential for such arrangements.

We hope that these comments from the Association are helpful. Please contact us if there are any further contributions that we might make.

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