

Raising Expectations: enabling the system to deliver

(Joint DCSF/DIUS consultation)

Consultation Response Form

The closing date for this consultation is: 9 June
2008

Your comments must reach us by that date.

department for
children, schools and families



THIS FORM IS NOT INTERACTIVE. If you wish to respond electronically please use the online or offline response facility available on the Department for Children, Schools, and Families e-consultation website (<http://www.dcsf.gov.uk/consultations>).

The information you provide in your response will be subject to the Freedom of Information Act 2000 and Environmental Information Regulations, which allow public access to information held by the Department. This does not necessarily mean that your response can be made available to the public as there are exemptions relating to information provided in confidence and information to which the Data Protection Act 1998 applies. You may request confidentiality by ticking the box provided, but you should note that neither this, nor an automatically-generated e-mail confidentiality statement, will necessarily exclude the public right of access.

Please tick if you want us to keep your response confidential.

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If your enquiry is related to the policy content of the consultation you can contact James Addy on:

Telephone: 0207 925 6209

e-mail: James.Addy@dcfs.gsi.gov.uk

If you have a query relating to the consultation process you can contact the Consultation Unit on:

Telephone: 01928 794888

Fax: 01928 794 113

e-mail: consultation.unit@dcfs.gsi.gov.uk

Please tick the box that best describes you as a respondent.

<input type="checkbox"/> Young person (under 18)	<input type="checkbox"/> Parent or carer	<input type="checkbox"/> Adult learner
<input type="checkbox"/> Teaching staff	<input type="checkbox"/> Professional working with young people	<input type="checkbox"/> Headteacher/college principal/leader of educational institution
<input type="checkbox"/> Local authority	<input type="checkbox"/> School	<input type="checkbox"/> General Further Education College
<input type="checkbox"/> Private sector organisation	<input type="checkbox"/> Sixth Form College	<input type="checkbox"/> Voluntary and community sector organisation
<input type="checkbox"/> Tertiary College	<input type="checkbox"/> Work-based learning provider	<input type="checkbox"/> Large employer
<input type="checkbox"/> Small or medium-sized employer	Other = TRADE ASSOCIATION	

Please Specify:
A TRADE ASSOCIATION of employers, a company limited by guarantee
{The voice of career guidance businesses in England}.

Chapter 2: Local authorities commissioning provision to meet the needs of young people

1 Do you agree that transferring funding from the LSC to local authorities to create a single local strategic leader for 14-19 education and training is the right approach?

<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not Sure
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Comments:

Whilst we agree that transferring funding for all of the 14 – 19 learning stage to local authorities should provide a more coherent approach across this age range, we are concerned that apprenticeship funding for young people has been excluded from the arrangements. Increasing the number of apprenticeships for young people is seen as essential both to increasing skill levels within the wider economy and enabling the raising of the leaving learning age to succeed.

It seems at odds, therefore, to separate funding for this important route from that for other 14 – 19 learning through the creation of the National Apprenticeship Service. We understand that the NAS will oversee apprenticeships for those over 19 also but would point out that the proposals for FE funding already split responsibilities between local authorities and the proposed new Skills Funding Agency.

Our major concern is the impact this will have upon the planning of sufficient and appropriate opportunities in all learning and work options in each part of England for young people.

Chapter 3: Operational models for commissioning

2 Do you agree that the model we have proposed for transferring funding to the local authority is the best way to give local authorities effective powers to commission, to balance the budget, create coherence for providers and retain the national funding formula?

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not Sure
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Comments:

We support the proposal that local authorities will need to collaborate in their commissioning decisions – especially where large FE colleges are involved. We also agree that, at least in the formative stages of arrangements, that there is likely to be a role for the Young People’s Learning Agency in intervening where agreement cannot be reached locally, or where commissioning has not been sufficiently effective.

However, we repeat our concerns that apprenticeship funding for young people is being treated separately and do not think that this part of the proposals is likely to lead to the greatest level of coherence for providers, nor the assurance that the sufficient range of opportunities will be assured to all young people everywhere.

Do you agree that there is a need for:

3 a) Sub-regional groupings of local authorities for commissioning?

√ Yes No Not Sure

Comments:

We agree that there will be a need for collaboration between local authorities in planning and commissioning. Travel to learn and work patterns must be factored into all planning and commissioning.

3 b) Authorities to come together regionally to consider plans collectively?

√ Yes No Not Sure

Comments:

We support even more strongly the view that Local Authorities should be REQUIRED to work collaboratively at regional level and that this is more likely to lead to consistent commissioning decisions and provision for young people.

3 c) A slim national 14-19 agency with reserve powers to balance the budget and step in if needed?

Yes

No

✓

Not Sure

Comments:

We agree that it will be necessary for someone to carry out the responsibilities described for the new 14 – 19 agency. We are not sure of the advantages of setting up of a new, discrete agency to carry out these functions as opposed to DCSF assuming direct responsibility, which may be a more cost effective solution.

4 Do you agree that we have described the way that these bodies would function in broadly the right way? Is the balance of responsibilities between them right?

Yes

No

✓

Not Sure

Comments:

We think the arrangements as described sound extremely complex with perhaps too many players involved.

Apart from those involved locally there will also be the national Young People's Learning Agency, the Skills Funding Agency for adults and the National Apprenticeship Service, all of which appear to be providing separate funding pots (directly or indirectly) to learning providers.

We are concerned that the National Apprenticeship Service appears to straddle the two sets of arrangements for adults and young people rather uncomfortably and suggest that some of its functions would be better carried out at more local level (for example its role in contracting with employers and training providers).

5 Do you agree that there is a need for a single local authority to lead the conversation with each provider?

√

Yes

No

Not Sure

Comments:

This makes total sense from the point of view of the provider.

6 Do you agree with the proposed approach for Learners with Learning Difficulties and/or Disabilities?

√

Yes

No

Not Sure

Comments:

We agree that local authorities should continue to have responsibility for learners with LDDs up to the age of 25. AND Regional and inter-regional mechanisms will need to be responsive to LDD Learner need.

7 a) Do you agree that local authorities should be responsible for commissioning provision for young offenders in custodial institutions?

√

Yes

No

Not Sure

Comments:

We agree with the proposal that host local authorities should plan and arrange education for young offenders. AND Regional and inter-regional mechanisms will need to be responsive to Young offenders' needs.

7 b) Do you favour the 'host' funding model, or the model where 'home' authorities are charged?

√

Host

Home

Not Sure

Comments:

Given that it is known which local authorities have young offender institutions within their areas, and how many young people these are likely to accommodate it seems simpler for funding to be made available direct to these local authorities than implement complex arrangements to recoup costs from home authorities.

7 c) Are there planning or legislative levers other than funding systems which would create the right responsibilities and incentives to promote the best outcomes for this group of young people?

√

Yes

No

Not Sure

Comments:

It should be possible to implement measures for both home and host authorities that take into account transition outcomes for young people leaving young offender institutions. Regional and inter-regional mechanisms will need to be responsive to Learner need.

Chapter 4: Management of the system

Do you agree with:

8 a) Proposals to ensure that informed learner choices should be a key part of shaping the system?

√

Yes

No

Not Sure

Comments:

Absolutely. We strongly agree that informing learner choice is key to successful outcomes. All young people must be assured of support throughout 13-19 learning and work on all options, all routes and all providers without bias or prejudice. Choices must be informed by labour market knowledge and understanding.

Participation in learning up to 19 must lead not only to achievement at 19 but also assistance impartially to post 19 options which will also be varied and must not be promoted with bias.

We question why, in paragraph 4.4, mention is made only of 'courses' as opposed to work based learning routes which should become increasingly important and valued with parity of esteem.

High quality information, advice and guidance must be available and must be provided independently of providers to ensure impartiality. IAG providers must be subject to robust quality assurance arrangements to ensure every part of England is served by the best quality provision meeting NATIONAL standards. It is essential that funding for IAG is sufficient to enable all learners to access the help they need.

Management of transitions and adequate support is also important if learners are to succeed as they move through the system.

8 b) The proposed approach to a common performance management framework based on the Framework for Excellence?

√

Yes

No

Not Sure

Comments:

We would like to see included within the performance framework measures for the retention, churn and progression of young learners (including progression post 19 into options in which discontinuation levels are reduced from current high (too high) levels.

8 c) The local authority role in commissioning to improve quality?

√

Yes

No

Not Sure

Comments:

We agree with the approach put forward but feel that currently the process of commissioning within some local authorities is under developed.
The term commissioning is not always interpreted in the same way and this can lead to inconsistency of approach.
NATIONAL guidance must be more robust.

9 Do you agree with the proposals for managing changes to 16-19 organisation and adjusting the arrangements for 16-19 competitions and presumptions?

√

Yes

No

Not Sure

Comments:

Feedback from learners, providers and employers must inform future plans.

Chapter 5: Funding

Are you content with the proposals:

10 a) To retain a national funding formula based closely on the existing one?

Yes

No

✓

Not Sure

Comments:

We have insufficient knowledge of the existing formula to comment in detail but urge that the cost of travel to learn/work is taken into account, especially for those institutions serving more rural areas where the cost of transport can be prohibitively expensive for young people. Too often rural communities are disadvantaged.

We would support the introduction of free travel on public transport for all young people up to the age of 19, especially in light of the raising of the leaving learning age.

10 b) For funding to flow to institutions on the basis described?

Yes

No

✓

Not Sure

Comments:
Please see above.

11 Would you support a move to a single national 14-19 funding system?

√

Yes

No

Not Sure

Comments:
We would like to see funding for apprenticeship for young people included in the arrangements rather than dealt with separately through the NAS – please see comments under question 1 above.

12 Do you agree with the proposals for capital funding?

√

Yes

No

Not Sure

Comments:

Chapter 6: Implementation

13 Do these proposals about timescale and transition appear reasonable?

Yes

No

√

Not Sure

Comments:

Whilst appreciating that change needs to be driven forward in order to achieve the desired outcomes, nevertheless the timetable for change is ambitious given the current position.

A balance needs to be struck with the need to avoid de-stabilising the system, particularly the FE sector, and the pace of reform.

Chapter 7: Reforming the post-19 skills system to secure better outcomes for adults

14 Do you agree with the proposal to create a new Skills Funding Agency to replace the Learning and Skills Council post-19?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> ✓	Not Sure
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Comments:

We feel to some degree that these proposals present an inconsistent approach to funding, particularly for the FE sector.

For 14 – 19 funding a strong case has been made to support local planning and funding through sub-regional groupings of local authorities. We support REGIONAL planning even more strongly.

For adult learners, however, funding will be administered nationally through the proposed new Skills Funding Agency (SFA), although with some input in terms of strategic planning for skills from RDAs and regional skills partnerships.

This approach of a largely locally led system for 14 – 19 learning but a nationally led (with regional input) system for adult learning appears to us to be inconsistent, and neither in the best interests of any age of learner nor of providers.

Funding may flow through LAs for 14-19, BUT we urge again a Regional requirement for opportunity planning.

15 Do you agree with the proposed role of the Agency?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> ✓	Not Sure
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Comments:

Whilst we note that the SFA will be ‘focussed on funding not planning’ and that most funding will be distributed through Train to Gain and Skills Accounts, we are not convinced that this approach will provide sufficient strategic overview of future skills needs at local, sub-regional and REGIONAL levels.

We note in chapter 8 that there is acknowledgment that some strategic planning for the future will be necessary and that this will largely be informed at regional level by RDAs and Regional Skills Partnerships.

We remain unconvinced of how effective this approach will be in finding the right balance between current demand for skills training and planning and implementing learning for future skills needs.

Chapter 8: Funding and commissioning

16 Do you agree with the funding and commissioning role proposed for the Skills Funding Agency?

Yes

No

✓

Not Sure

Comments:

Please see comments above under questions 14 and 15.

17 Do the proposals in this chapter reflect the right balance of strategic commissioning and individual customer choice?

Yes

No

✓

Not Sure

Comments:

We note that the Skills Funding Agency will have a regional as well as national presence and that it will work closely with partners to 'respond to strategic demand and ensure an effective environment in FE at a regional level'. We welcome this.

We are concerned, however, that inconsistent messages are contained within the document since the previous chapter gave a clear message that the SFA would be a funding and **not** a planning body. It will be important that there is clarity about the precise remit of the agency before these proposals are developed further.

We urge that the SFA must have a strategic role in planning otherwise our fears that some young people will be disadvantaged in terms of option choices will be exacerbated.

Chapter 9: Sponsorship of the FE system

18 Do you agree with the proposals on performance management and the performance intervention role of the Skills Funding Agency?

Yes

No

✓

Not Sure

Comments:

Please see final comment on Q 17

19 Have we got the right approach to sponsorship of the FE sector as a whole?

Yes

✓

No

Not Sure

Comments:

The proposals are at risk of being too complex, with too many opportunities for confusion between the roles of the various organisations mentioned within them – local authorities, the SFA, the Young People’s Learning Agency, RDAs, Jobcentre Plus, the National Apprenticeship Service, government offices, the Improvement Body for FE and the providers themselves.

We are concerned that such a complex set of arrangements may be difficult to fully implement. We also have concerns that such a dichotomy between funding mechanisms for young people and adults will not be helpful in terms of the transitions of individuals between the two systems.

We remain concerned that PLANNING responsibilities and accountabilities will still leave too much to chance in terms of sufficiency of opportunity options in all

localities (by which we mean established travel to work & learn patterns which are not LA boundary bound).

Chapter 10: An integrated system: other functions of the Skills Funding Agency

20 Do you agree that each of the functions in this chapter should be performed by the Skills Funding Agency?

Yes

✓

No

Not Sure

Comments:

Careers England responded separately to the recent 'World Class Apprenticeships' consultation and expressed our concerns at that time about the setting up of the NAS as currently proposed. In particular we have significant concerns about the national matching service proposed for the service which will not best serve the needs of employers or young people and adults at local level. In our response to that document we made detailed alternative suggestions.

We are also concerned that for the last year for which statistics are available 59% of apprenticeship and advanced apprenticeship starts were for those aged 16 - 18, yet it is planned to house the NAS within the adult Skills Funding Agency.

Apprenticeships will become an increasingly important route for young people as the raising of the leaving learning age is implemented. The current approach risks too low a prominence being given to apprenticeships by those planning 14 – 19 learning locally (by which, again, we mean established travel to work & learn patterns which are not LA boundary bound) .

Chapter 11: An integrated system: how the Skills Funding Agency fits into the wider skills landscape

21 Do you agree with this description of the wider skills landscape within which the Skills Funding Agency will operate?

✓

Yes

No

Not Sure

Comments:

22 Have you any further comments?

Comments:

CAREERS ENGLAND, as a growing TRADE ASSOCIATION, has members (employers) across England which are providing publicly funded careers information, advice and guidance services to young people.

We look forward to working more closely with DCSF and local/regional partners to improve the career pathways, achievement and economic success of all young people in every Region and local area of the country.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply : YES PLEASE

Here at the Department for Children Schools and Families we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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All UK national public consultations are required to conform to the following standards:

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
3. Ensure that your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process influenced the policy.
5. Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

Further information on the Code of Practice can be accessed through the Cabinet Office Website: <http://www.cabinetoffice.gov.uk/regulation/consultation-guidance/content/introduction/index.asp>

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 9 June 2008

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Send by e-mail to:

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