

Response of the Association of School and College Leaders to the Department for Business, Innovation and Skills' consultation on skills for sustainable growth

Introduction

- 1 The Association of School and College Leaders (ASCL) represents over 15,000 members of the leadership teams of secondary schools and colleges throughout the UK.
- 2 Many ASCL members are in the forefront of developing and providing opportunities for skills development. This consultation response has been collated after discussion with members of the ASCL Education and Post-16 committees.
- 3 Members are pleased to note that the wider benefits from people engaging in learning are included as part of this consultation document and are committed to increasing the provision of help to those who need additional help to progress, including disengaged young people, the unemployed, offenders and those with disabilities.
- 4 ASCL accepts the principles articulated in the document, though there are few new points made.
- 5 The clarification of the point relating to accreditation of existing competence and its lack of real and lasting difference to the national skills base is well made.
- 6 Colleges are willing to respond flexibly to employer and learner demand within a coherent and simplified further education system and welcome the chance to display their professional competence without undue intervention.
- 7 However, government should recognise the professionalism and expertise of those that lead our colleges, and allow them to make their decisions without excessive audit or interference. If sustainable growth is to result from their efforts, then the level of trust between government and provider has to improve.
- 8 Simplification of the skills system should be based on the extensive work already undertaken on establishing and using the Qualifications Credit Framework (QCF).
- 9 The government's stated intentions to allow an unstructured growth of qualifications through the assessment bodies may limit such simplification. Clear pathways to progression are needed; there is a danger that unlimited multiple offers will obscure these, both for learners and employers.
- 10 The balance between private and public investment in skills development depends on the benefit that employers perceive from their involvement. If the government were to offer incentives, for example tax rebates for employers

prepared to lead on skills development, further private investment would be encouraged.

- 11 BIS might also like to consider re-introducing training levies on relevant industries, in order to increase what has been patchy involvement of employers making the existing skills pledge and to ensure wider contribution to the skills development that will benefit individual companies as well as the nation. Compulsory levies would be unpopular with employers, but their effectiveness in contributing to both national transformational development through investing in long-term future training would be considerable.
- 12 The consultation document does not acknowledge that the achievement of a vocational qualification has some merit in its own right, regardless of whether the person qualified actually uses the specific industry skills learnt. Many employers require employees that are flexible, receptive and able to learn, so that they can then add value to that person's qualifications through specific training for a particular role. It is important to recognise that many vocational skills are generic.
- 13 However, ASCL supports the intention that all vocational qualifications should be respected and are therefore keen to see them properly organised, accredited and recognised through the QCF.
- 14 ASCL agrees that employer-led bodies should lead work on ensuring that apprenticeship frameworks offer high-quality, economically relevant and industry-ready provision. The existing Sector Skills Councils (SSCs) are designed to provide this service; whilst their performance is variable resources would be saved by using and reforming existing structures rather than inventing new ones.
- 15 In order to encourage apprentices to progress to level 3 and beyond, there is a need to ensure that there is a genuine parity of esteem between vocational and general qualifications, acknowledged through fair funding and public support for those who choose the vocational route over others.
- 16 In order to support those who might benefit from an apprenticeship, but do not yet have the skills to begin one, attention to the development of foundation learning and clear, acknowledged progression routes to apprenticeships should be given now, whilst this curriculum is still in its introductory stages.
- 17 There is a lack of continuity for young people with learning difficulties (called 'SEN' pre-16 and 'LLDD' post-16) with two separate systems separately administered. Such divisions do not encourage young people to progress beyond Foundation Learning. The DfE's Advisory Group for LLDD, chaired by Professor Peter Little, has repeatedly made efforts to raise this situation and could usefully be further consulted.
- 18 Progression from level 3 apprenticeships into higher education is supported by ASCL members, who are keen to encourage the work of such initiatives as AimHigher and Action on Access. It is, however, important that HE provision of level 4 and 5 apprenticeships is not seen as a second class route and the government should be aware of this in any public pronouncements made on the topic.

- 19 The need to ensure that training actually leads to new skills, knowledge and competence is obvious. Employers are in a unique position to encourage this through organising competitions; providing case study situations for assessment purposes, arranging visits to manufacturing and other sites and encouraging their employees to become governors of colleges in order to support vocational training that will lead to local employment and prosperity.
- 20 In order to ensure that colleges access alternative funds than those directly from government to provide training options, reduction of paperwork and the high dependence on an expensive and time-consuming bids culture is necessary. Professionals should be allowed autonomy, reduced paperwork and unnecessary audit requirements.
- 21 Question 9 of the consultation suggests that colleges are in some way making the transition from learning to work more complicated than necessary. In order to reduce this perception, the government should allow for learners to leave courses before their completion if they are entering employment, without financial penalty for the learning organisation. At present this facility is limited to qualifications that are directly related to the job gained – this should be made more flexible in order to recognise the generic value of many vocational qualifications.
- 22 Enterprise education in colleges has been a successful feature in the past. The government's best route to returning to this is to ensure that funding goes directly to the provider and is consistent, long-term and focused. Too often, funding for such programmes has been directed through other local organisations, thus reducing its effectiveness and value for money.
- 23 ASCL members are firmly committed to reducing low levels of literacy and numeracy at the earliest possible learner age. Therefore they support continuance of entitlements-led funding.
- 24 This funding should not be time-constrained and should be available to all those that require it. An extension of the concept of the pupil premium to post-16 learner funding would be welcomed by providers and help to provide consistency and continuity.
- 25 The excellent work carried out through Unionlearn should be further encouraged, as this enables low-skilled employees to acknowledge and improve their literacy and numeracy in a non-threatening manner. The point made in paragraph 17 above on ensuring that foundation learning has a direct link to apprenticeships for young people with learning difficulties and disabilities is also relevant here.
- 26 The QCF contributes extensively to rationalising the offer and design of vocational qualifications. It is, however, necessary to ensure that once there are adequate qualifications to cover the depth and breadth required by employers for particular vocational areas, the development of parallel qualifications should cease.
- 27 Whilst it would be unwise for the government to become party to specialist area skills strategies, it cannot wholly abdicate responsibility for ensuring lack of duplication and complexity. The removal of the QCDA's overview of what assessment bodies offer may well create a new problem of over-offer and subsequent devaluation of vocational qualifications.

- 28 Employers are not always aware of current qualification offers and the government should be wary of assuming that the views of national employers' always represent those of employers, many of which are far too small to be involved in national discussions or even to be aware of the pronouncements of the bodies that may be thought to represent them.
- 29 ASCL is committed to independent careers guidance and supports any moves made to give coherence to the careers services, particularly in the difficult transition period from pre to post 19.
- 30 Whilst the concept of Lifelong Learning Accounts for individual adults is attractive, it will require very strong support through informed advice and guidance. It is often those adults who are most in need of such support and funding who are unable to access it.
- 31 It is important that the professionals employed in colleges are trusted to approach local learners in manners best suited to their individual needs – through their communities, churches, welfare centres and other networks. To be successful, there must be an element of flexibility and trust as those that are difficult to reach are by definition inaccessible by standard routes.
- 32 Whilst ASCL members welcome simplification of any approach to informing learners and employers about the quality of their colleges and the courses they offer, they are conscious that they have already devoted considerable energy to the development of the Framework for Excellence. ASCL will not be supportive of any attempts to repeat what has become a time-consuming and costly exercise for both government and individual organisations that have devoted extensive staff time and effort to developing the Framework. Any new approach to such work should be based on current practice.
- 33 ASCL approves any moves towards intelligent accountability and will support the proposed Business Enterprise Partnerships as long as they truly replace and do not duplicate current practice.
- 34 High quality information should be accessible on websites in a simplified form to all those who require it, with hyperlinks to detailed information for further research purposes.
- 35 The government may like to consider providing briefings for press agencies relating to specifically local industry, thus encouraging interest in areas through the use of regionally focused reports in the local media.
- 36 As leaders themselves, ASCL members appreciate the importance of good leadership and management in ensuring successful business performance. They also believe that such responsibilities and effort require commensurate reward.
- 37 ASCL members are pleased that their efforts in meeting the needs of the local community have been so clearly recognised. College leaders are keen to make facilities available for learning as widely as possible. But government must recognise that such activity has a high cost for colleges that are already struggling to meet the demands of learners on reducing budgets, often in unsuitable premises. These issues will have to be addressed if there is to be any meaningful development of productive partnerships with third sector organisations.

- 38 Colleges are being asked to consider the reinvigoration of adult and community education when so many excellent ventures have been discontinued in the past few years. In the current economic situation it is difficult to motivate staff and renew energies that have been depleted by repeated cuts. It is only through the concerted efforts of colleges, government and businesses that this will be possible. Consistent and long-term activity will be required.
- 39 Whilst the proposed performance indicators to measure the success of effort are sensible and have the merit of simplicity, this essential criterion of simplicity is not specified. To have any chance of success, the new skills strategy should be simple, accessible and consistent over a period of time, allowing for organic growth and the development of good practice that can be shared.
- 40 ASCL will be happy to explore any points made in this response and to contribute to further discussions if required.

Martin Ward
Deputy General Secretary
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