

Skills for Sustainable Growth – consultation on the future direction of skills policy

Introduction

The Association of Learning Providers (ALP) represents the interests of a range of organisations delivering state-funded vocational learning. The majority of our 550+ member organisations are independent providers (from both the private and the third sector) holding contracts with the Skills Funding Agency, with many also delivering Department of Work and Pensions (DWP) provision. In addition to these we have a number of colleges in membership, as well as non-delivery organisations such as SSCs and awarding bodies as Associate Members, which means that ALP offers a well rounded and comprehensive perspective and insight on matters relating to its remit.

Executive summary

1. Consistent with the Coalition Government's policies on public service delivery, BIS should introduce an **open further education and skills market under a single line budget**, where all provision is open to delivery by good quality public, private and third sector providers. Our employers continue to demand a system whereby a business can have a single conversation with the provider about their skills and training needs, with the provider then able to put together a responsive training package – pulling together any public funding where this is available. We are concerned that some of the early proposals from the new Government seemed to be moving away from this important principle, making it impossible for independent providers to respond in the comprehensive way both demanded and necessary.
2. In keeping with pre-election commitments, BIS, DfE and DWP need to work more closely on **integrated employment and skills provision** which recognises that pre-apprenticeship training and full apprenticeships linked with the new Work Programme can make a significant impact in achieving more sustainable employment for our young people and adults.
3. The YPLA and Skills Funding Agency should be brought together into a single procurement agency, or if that is not possible, they should at least use the same systems and processes to avoid costly and wasteful duplication of activity.
4. The Government's strong support for apprenticeships is the correct way forward for meeting the skills needs of the economy and ALP advocates the development of a **four-level all age apprenticeship programme**. This also requires finding a **new high quality pre-apprenticeship route**,

not just for young people who would have previously benefited from proper work based Programme Led Apprenticeships but also for older people, both employed and unemployed, who would benefit from accessing a full Apprenticeship.

5. Employers and learners will benefit from improved efficiencies in the FE system if costs are reduced by the adoption of a single **simplified quality standard** for providers focused on outcomes rather than process.
6. Against a backdrop of severe local authority cuts, the system cannot function efficiently without an **impartial information, advice and guidance service** throughout the country and the Government is urged to intervene before local services are decimated.
7. ALP strongly supports the proposals for **Lifelong Learning Accounts**, providing learners can choose to access provision from any quality assured provider, regardless of type.
8. Given that there are appropriate replacement electronic systems available, there is still a long way to go in ridding providers of **excessive, and often unnecessary, bureaucracy** associated with monitoring and audit of processes.
9. **We have to do more for less and independent providers can help meet this challenge if they can operate in a fully open system under a single budget.**

Overview

ALP welcomes the opportunity to contribute to the future skills strategy for England. We believe that the current financial climate, despite the inevitable reductions in funding expected in the forthcoming Spending Review, offers a real opportunity to completely re-examine the current further education system and design a system better suited to the needs of a modern economy, competing in an increasingly competitive world market. The time is right for a complete, and radical, overhaul of the entire further education sector, not just the kind of tweaking around the edges that has, in the past, so often simply resulted in additional complexity and bureaucracy for all those trying to navigate the system.

This response should be read in conjunction with the ALP response to the consultation 'A simplified Further Education and Skills Funding System and Methodology'.

The importance of skills

There are few who understand the vital importance of skills to the nation and its economy more than ALP's members. Together they deliver the majority of Apprenticeships, key programmes for young people such as Entry to Employment, Young Apprenticeships, etc, the majority of employer responsive provision (previously under the Train to Gain programme) funded by BIS. In addition, many also deliver DWP employability provision. ALP has

argued for greater integration of employment and skills – two sides of the same coin – for many years and welcomes the increased acceptance of this need which is now apparent within the Government and its agencies, particularly as both BIS and DWP have identified ‘sustainable employment’ as the key outcome for their respective programmes.

It goes without saying that the provider workforce will have a vital part to play in delivering the national skills strategy. It is important that the skills delivery workforce is itself excellent, so that learners get the best possible opportunities, especially as skills levels are driven up to level 4 and higher.

Principles for a skills strategy

Overall ALP supports the general direction of the principles outlined in the document. Our comments on some specific points of particular importance or concern are set out below.

1. A respected and credible training offer

ALP agrees totally in the need for the vocational route, and vocational qualifications, to be given the same respect as the academic route/qualifications – always described in the past as ‘parity of esteem’.

Employers themselves do recognise the value of Apprenticeships, rightly seeing them as the ‘gold standard’ of vocational training, a fact clearly demonstrated by the following quotes from research undertaken by Warwick University in 2005¹:

“Employers of apprentices acknowledge that the future of their companies requires them to make an on-going investment in young people that will provide a strong internal labour market capable of filling a range of jobs in the future.”

Too often, however, individuals have been persuaded, on the back of a mistaken perception that off the job training is somehow better than work based training, to go on a course offering qualifications that ultimately do not equip them with the skills expected by employers. One example of this is the usually college based, non-employer located Programme Led Apprenticeships (PLAs) which did much to discredit the many valuable, and very different, employer based PLAs which offered many young people a valuable route into employment. All PLAs will now cease following the recent ‘Apprenticeship’ Act, and there is a real need to find an alternative high quality **‘pre-Apprenticeship’** route for the many young people who would previously have benefited from proper work based PLAs. We will return to this later in this document.

One essential for learners to choose the training best able to meet their needs will be the availability of appropriate information – plans for **‘course labelling’**

¹ Employing Apprentices: The Business Case – report prepared for the Apprenticeships Task Force by The Institute for Employment Research, University of Warwick., September 2005.

are currently being considered which would be able offer simple, clear and easy to understand data on available provision.

As is recognised in the consultation document, Apprenticeships bring value to individual and employer alike, and we believe that a clear, well understood and credible vocational route, along the lines of the **four level, all age Apprenticeship programme** suggested in the paper 'Time for the next phase of development for Apprenticeships'², is more important than ever. Such an approach would also facilitate opportunities for progression, not just to level 3, but beyond. ALP still has a clear position on what constitutes an Apprenticeship: an Apprenticeship at whatever level (2, 3, or higher) has to be **employed** (ie the Apprentice works for an employer and is in receipt of a wage). The true value of Apprenticeships, however, is far more than the simple sum of their constituent parts, offering structured work integration and progression within sustainable employment. The Apprenticeship should follow a fully approved, employer designed, clearly defined '**framework**', and employers will need to play their full part in ensuring all Apprenticeship frameworks meet the criteria for their trade or occupation.

At the same time, given the current financial situation, employers must now expect to have to pay more towards any training their employees require. There is, however, a danger that this expectation of employer contributions for 16-18 year olds in work based learning might lead to discrimination against young people. In addition, removal of Government communications budgets will impact directly on businesses' understanding of the changes at a time when they are being requested to contribute more – clear communication will be vital. The recent independent review by former LSC Chair, Chris Banks, of **fees and co-funding** in Further Education in England makes some specific recommendations which are being considered as part of the parallel consultation, 'A Simplified Further Education and Skills Funding System and Methodology', and ALP will comment on the review proposals in its response to that consultation. We must, however, make it clear here that ALP does not believe that there should be a requirement simply for up-front **cash** payments from employers before Government funding for any programme flows as there needs to be a proper recognition of the considerable levels of 'in kind' contribution being made by employers.

If, as seems likely, a requirement to collect fees is introduced it must be applied rigidly and equally to all providers (regardless of type) that are delivering that programme or there will be a real danger of some providers being able to 'undercut' others by offering reduced prices to employers. ALP has always argued that no provider should be given preferential treatment – protection – based on its type (public, private or third sector) and we welcome recent declarations from the Government, including the Prime Minister, on the importance of **neutrality** in its **commissioning** of any services. We ask BIS to respect this Government policy.

² [Time for the next phase of development for Apprenticeships – published by ALP in October 2008.](#)

Linked to this, ALP has long argued the case for a single, professional procurement agency working to a range of Government Departments, and in particular (though not necessarily exclusively) the Department for Education, the Department of Business Innovation and Skills and the Department on Work and Pensions. Whilst this is still our ultimate aim, there is a real case to **bring the YPLA and Skills Funding Agency together now** – the savings to both providers and Government would be considerable and would help mitigate some of the inevitable cutbacks in funding that will be announced following the CSR – and we urge the Government to take immediate action to merge these two organisations into a single body. Whatever the decision on such a merger, we do not feel there is a need to retain the National Apprenticeship Service (NAS) as a separate entity within the Skills Funding Agency, and would suggest its activities be subsumed into the Agency at the first opportunity. If a decision is taken to retain the YPLA and Skills Funding Agency as separate entities, they should at least commit to operate on the same basis, in order to avoid the additional bureaucracy and cost – to both providers and to Government – of having to manage two different systems and processes.

As mentioned earlier there is a **need for a comprehensive pre-Apprenticeship programme**. ALP has just published a paper, 'Government funded vocational learning: preparation for and delivery of full Apprenticeships'³. This paper draws out what needs to be encompassed within pre-Apprenticeship provision and makes the case that Government funding for such provision should only support training that would ultimately directly support the achievement of an Apprenticeship framework at some later stage. It also suggests that any learning that can contribute in this way should automatically be accredited at the time it is achieved, to avoid potential 'double funding' of similar learning activity later.

Of particular concern to work based learning providers at the moment are the proposals to introduce mandatory **functional skills** into Apprenticeships. At the ALP conference in July Minister John Hayes announced that the move from key skills to functional skills would be put back until at least March 2011 pending a review – a decision welcomed by providers. ALP has been increasingly concerned, however, that the revised implementation date was more a 'stay of execution', rather than the much needed review of their 'fitness for purpose'. Providers' concerns were not that they were unready for the change over in September 2010, nor were they 'anti functional skills' – they were simply concerned that the new arrangements were not yet fit for purpose as they had not been properly trialled in a work based learning, or indeed adult, environment. We urge the Government to undertake a thorough review of functional skills and only make them a mandatory requirement within Apprenticeships when they can offer improvements on the current practices. If this requires that the current 'review period' is extended beyond March 2011, then this is what should happen. It is in no-one's interest to introduce a system of qualifications into work based learning that do not serve the

³ [Government funded vocational learning: preparation for and delivery of full Apprenticeships – published September 2010.](#)

purpose for which they were intended. Currently too many foundation level qualifications are predicated both in terms of content and delivery on the needs of under-achieving sixteen year olds, as a backstop for a failing compulsory education system. This is not what FE should be about. FE should be an "added value" sector offering qualifications tailored to meet the needs of an adult learner cohort instead of making them do the same ones as recent school leavers.

Some members have also pointed out that some vocationally gifted learners could be prevented from improving their skills by accessing higher level qualifications because of their inability to achieve functional skills, and argue that this is both unfair and discriminatory. This raises once again a question as to whether Functional/Key Skills ought to be included in Apprenticeship frameworks at all.

Whilst **Apprenticeships** are rightly deemed the '**gold standard**' in work based vocational training, there will always be some occasions when it is not the right option for a particular learner. We would hope, however, that even if an Apprenticeship is not the ultimate goal when the learning starts, Government funding for other workplace learning should be reserved for those learning activities that can directly support the achievement of an Apprenticeship at a later stage should circumstances change. As long as such **skills are properly accredited at the time they are achieved** they can be used to form part of a valuable '**portfolio**', which can be built on as and when the learner becomes ready to progress further, possibly into an Apprenticeship framework proper. As stated earlier, an Apprenticeship is far more than simply the sum of its parts and a key element is the experience the Apprentices acquires as an **employee**, in the workplace. This must be an essential requirement before an Apprenticeship is deemed to be completed and accredited.

We have already stated our belief that employment and skills training are inextricably linked, and would wish to simplify the system to allow greater flexibility for providers trying to support the **unemployed** into work and beyond. DWP ministers have already stated their belief that for many unemployed the best such opportunity would be an Apprenticeship. That being the case, it would seem to make sense if properly accredited training in those elements of an Apprenticeship framework that can be undertaken outside the workplace could be offered to unemployed – a form of pre-Apprenticeship – ready for them to convert onto a full Apprenticeship and continue their training once in work. The best way to achieve this is for the employment and skills agendas to be devised in conjunction with each other so ensuring the best use of finite resources.

This response so far has concentrated mostly on work based vocational learning, but we do accept the value and importance of much college based and other provision not so particularly focused on the workplace. Colleges have much to offer both individuals and employers, and undoubtedly have a particular **role to play in their communities**, but so too do **independent providers**, who must be involved at all stages as local priorities are identified

and solutions worked up. It should be a **requirement that both independent and public sector providers are fully and properly involved in any local partnerships set up to identify the skills needs of their area** and devise strategies to address these. What does need greater clarification is to what extent some of this provision should be supported by the taxpayer, and what should be paid for by the employers and individuals who will benefit from it. We can see merit in some colleges opening up their facilities and inviting third sector and others to offer the more social and community-based learning opportunities so valued by many as a 'stepping stone' to further development, or even to work based learning providers supporting workers and employers in sectors where they have greater expertise than would be available from the college.

2. Funding and entitlements

ALP believes that anyone with a need for 'skills for life' should be fully funded to level 2 but it is unclear how such needs led, very flexible provision would be funded, especially as flexible provision is not best suited to ESF. Helping this particular group – both 16-18 year olds and 19+ – would bring significant benefits, not only economically, but also socially and would also increase the monies raised by taxes as they gain and progress in work.

Again, this whole area needs to be considered alongside the proposals set out in the paper, 'Government funded vocational learning: preparation for and delivery of full Apprenticeships'⁴.

3. Helping individuals and employers choose the learning they want

At the moment there are far too many different kite marks and **quality standards** which can only confuse and actually make it harder to compare similar provision because of the different standards used. A particular concern to ALP since the introduction of the new OSFTED inspections is that grade 1 colleges will be risk assessed but not be inspected whilst independent providers in the same position will still be inspected. ALP believes that the same processes should apply to any provider regardless of type. In its paper outlining how to drive up quality whilst reducing unnecessary costs in FE⁵ ALP has argued that Government designed quality standards are superfluous, with evidenced **outcome based performance** offering all that consumers and funders need to justify Exchequer funding.

Regarding the Qualifications and Credit Framework, ALP believes that the most effective way of ensuring that each qualification is quality assured by employer led bodies is for all parties, including providers, to be involved in the design and delivery. Providers are the experts who deliver and manage the learning programme in the majority of work based learning settings (especially for SMEs) therefore have a vital role to play in identifying employer need and developing suitable units and qualifications.

⁴ See footnote 3.

⁵ [ALP's main points for driving up quality whilst reducing unnecessary costs in FE – published by ALP in June 2010.](#)

It is critical that any qualifications developed are quality assured to ensure the needs of employers has been fully considered. However this should be a simple process which quality assures rather than designs/regulates qualifications. Any submitting body (mainly Awarding Organisations) should only have to demonstrate that there is employer demand for the qualification/unit and that the qualification being submitted has been developed having involved employers and providers in the design. Each SSC should make Ofqual aware of their criteria for demonstrating meeting their needs and these criteria should be considered by Ofqual as part of the approval process. This would not only ensure that employer needs are met, but also strip out any unnecessary bureaucracy from the approval process, and making the learning market work more efficiently, effectively and economically.

In the paper on how to reduce costs ALP identified the need for a **demand-led open market** as a top priority. It is vital that the FE system is led by, and able to respond to, the real time needs of the economy and employers. Any attempts to plan and set targets for skill provision in advance will inevitably restrict providers to delivering pre-determined, and often out of date, levels of provision that do not reflect the real need in the market place, in turn preventing the system from supporting training vital for the future of businesses and their employees. (An initial paper, 'Moving to a real time 'Demand led system', published in June 2006, describes how such a system might be introduced.⁶)

In addressing the open market issue, we were encouraged that in his foreword of the consultation John Hayes referred to the Leitch review and we believe it is right that the new government should continue with the direction of travel that began in response to it. Furthermore in the BIS Strategy for Sustainable Growth, the Secretary of State promoted the case for open markets⁷ and it would surely be wholly contradictory to his set principles (also espoused by the Prime Minister in newspaper articles on public service delivery since May⁸) if the Department continued to ringfence FE budgets to exclude certain types of provider.

A single budget for FE and skills will generate the dynamism that ministers want from the system in terms of being more responsive to the demands of employers and learners. By this, we really mean a single budget with no need to maintain separate Adult Learning Responsive and Employer Responsive budgets or any other proposed budget suggested in the BIS skills funding consultation document.

⁶ ['Moving to a real-time 'Demand led system' published in June 2006.](#)

⁷ BIS Strategy for Sustained Growth, July 2010 – "... an economy where the public sector does not crowd out private sector opportunities, but instead, leverages private sector investment and encourages businesses to start, grow and thrive".

⁸ Guardian article by David Cameron, 11th September 2010 – "...we will increase competition in public services".

Within a single budget, we would recognise that the Government would want to earmark certain types of provision as key priorities, but **all** provision within the single budget should be open to any good quality provider from the private, public or third sectors.

In the four years since Leitch's call for an open market we have since seen a massive deterioration in the state of the public finances, which necessitates the delivery of more efficient public services. In its July report on public services, the OFT commented: "Restrictions on the scope of competition have not allowed the full potential benefits to flow through⁹".

We agree and therefore it is totally unacceptable in these circumstances for it to be proposed that independent providers should only be invited locally to step into certain types of adult learning and community provision when colleges have failed to deliver effectively. The country simply cannot afford to wait for failure to occur nor pick up the costs of dealing with it.

In this context we need to put to bed the myth that independent providers are only interested in the 'low hanging fruit' in adult learning. ALP has many private and third sector providers, including those involved in the delivery of welfare-to-work programmes, who have worked for many years to seek out and help the hardest to help in the most deprived areas and estates in the country, often achieving life-changing outcomes.

David Willetts said in his AoC conference speech last November that "a new settlement for further education must include a level playing-field for all providers". He promised later in the same speech that the whole sector would be 'strengthened by new competitive pressures which are a necessary quid pro quo for the freedoms' which have since been granted to colleges.

Against the background of this commitment and the other principles laid down by senior ministers on opening up public services, it is simply indefensible for ring-fenced budgets to remain a feature of the FE system.

Where the publicly funded skills market is open, the benefits are clearly seen. One of the coalition government's first announcements on entering office was to set a target of an additional 50,000 apprenticeship places to be filled this year. The latest indications are that this will be far exceeded. Once again, independent training providers, who continue to be the majority providers of apprenticeships and adult work based learning, have demonstrated their flexibility and ability to respond quickly to changing priorities by delivering excellent results for the Government. As David Willetts said, **we have to do more for less; and independent providers can help meet this challenge if they can operate in a fully open system under a single budget.**

More specifically, in answer to question 3, in the consultation, ALP believes that more private sector investment will be attracted into the sector if a fully

⁹ Speech, Reform Conference, London Stock Exchange by John Fingleton, Chief Executive, Office of Fair Trading, 7th July 2010.

open market becomes a reality, eg since its purchase of Melorio earlier this year, Pearson plc has been investing heavily in its training arm and we are confident that there would be more examples like this if the market were opened up.

ALP has constantly argued the **critical importance of impartial information, advice and guidance** to the skills system. We are very concerned that many local authorities are currently making savage cuts – 11% - 45% have been quoted - to the funding of their careers guidance services and we urge the Government to take immediate steps to address this potentially disastrous situation before it is too late and services are decimated. Another concern has been the failure, so far, to implement the section of Apprenticeships, Skills, Children and Learning Bill requirement that all pupils in English secondary schools should receive information about apprenticeships as part of the information, advice and guidance (IAG) which they are given about their post-16 options. This has become even more worrying now schools no longer have to complete self-evaluation forms which provide evidence to Ofsted that their IAG obligations are being properly followed. That said, we do also have concerns about the 'quality' of much of the advice given by careers services, as they often do not fully understand the full range of provision that is available, eg many do not appreciate the value of work based learning and the very real difference between undertaking a vocational qualification in a college setting and completing an employed Apprenticeship using a work based learning provider.

We welcome proposals for the introduction of **Lifelong Learning Accounts**, which we believe have much to offer. They must, however, allow the learner to access the provision they need from any provider capable of delivering to the standards set by the funder, regardless of type. This would mean that a learner must be able to access what is usually described as 'adult learner responsive' funding via an independent provider – either private or third sector – should they wish to, and not be forced to go to a college of further education, who are presently the only providers able to access this funding.

Current proposals for the development of a form of **course labelling** would seem to offer an ideal means of helping learners to choose the appropriate learning route for their needs. It will be important that any such system is kept simple, offering only such information as is necessary to allow the learner to make an informed choice – comparative success rates and destinations are obvious requirements. A facility for recording customer satisfaction online, along the lines of that used by hotels, etc, could provide another useful feature for the system.

4. Giving college and training organisations the freedom to respond

For the most part ALP supports the proposals for reducing the regulatory requirements set out in the document. ALP has long argued against the excessive – and often unnecessary – bureaucracy imposed on providers. Far too much data collection, monitoring, inspection and audit of process rather than outcomes involving out of date, 'hard copy' systems still exists.

Management information systems and output evidence should be based on appropriate **electronic systems**, reducing cost and bureaucracy to both Government and providers; a start has been made, but there is still a long way to go.

On performance management, ALP has long pointed out that the responsibility for this must lie with the providers themselves. They should adopt robust **self assessment** processes with appropriate **independent verification** (inspection) at appropriate intervals – perhaps a redefined role for Ofsted? Poor performance reflects badly on the sector as a whole and should be removed from the system rather than being ‘rewarded’ with additional Government funding aimed at bringing it up to the standards achieved without such support by the many other, good quality providers operating in the system.

We also agree the need for proper accountability for service users and have covered our views on proposals for the development of course labelling earlier in this document. We do have real concerns about the development of **local enterprise partnerships** as we do feel that independent providers, and smaller, niche providers in particular, would often lack the capacity and resources to take on the burden of becoming involved, leading to a **lack of visibility** that could ultimately undermine the training infrastructure as a whole in a particular locality. It is unrealistic to expect many training providers to take on a different role that they are not particularly equipped to undertake. At the same time, it will be vital that independent work based learning providers are fully involved in such partnerships as they identify the needs of their area and work up their plans to address these needs. Without the involvement of these key players in the FE system it will be impossible to deliver the skills strategy effectively.

There are already several good examples local provider networks (eg Sussex) that can and do play a role representing providers on many local groups and provide a facility for various groups and bodies to access co-ordinated local provider representation. It will be important that these are not lost, but are strengthened and replicated across the country.

5. Incentives to train in priority areas

ALP has long believed that moving away from the old, qualifications-target driven system to a **real time, employer demand-led system** is key to developing an efficient, effective and responsive skills system. For far too long targets have been set, often 18 months in advance, only to find the world has moved on and the targets are no longer relevant by the time they are being achieved and counted. As described in the paper, ‘A vocational route for the future – the challenges facing the FE system and the way forward’¹⁰ **fundamental change in Government target setting** is required, moving away from qualifications and moving to measure success in terms of

¹⁰ [A vocational route for the future – the challenges facing the FE system and the way forward – published by ALP in May 2010.](#)

increased productivity and profitability (for businesses) and enhanced skills, income and opportunities (for individuals).

In such a system, responding to actual demand rather than Government pre-set qualification targets, funding should be made available within clear contractual financial limits to support those activities identified by the Government as high priority, via a range of 'product lines' such as Apprenticeship frameworks, pre-Apprenticeship provision, etc. It is important to recognise, as the consultation document itself acknowledges, that there are some factors affecting skills gaps and shortages, such as poor working conditions and employment terms, which are out of the hands of those in the FE system and can only be addressed by the industries and employers themselves.

Employers do not believe they should take responsibility for the deficiencies of the school system and it is unreasonable, within an employer demand led work based learning system, to expect providers to develop basic skills to a satisfactory level (part-time and in a few weeks) where schools have failed to do this over a period of eleven years full-time education. Obviously there is a real need to offer this difficult and very significant group of learners the help and support they need – a need that will require appropriate, and not inconsiderable, resources to be made available if providers are to succeed where schools have failed. It is not just young people that lack these basic skills, however, and there is a real need to retain and maintain provision for older learners, both unemployed and in work, to enable them to gain the necessary skills to get into and progress in work. We believe that the increased tax revenue from these people as they gain employment and/or wage increases would go some way towards meeting the cost of the initial support required.

ALP believes that linking all Government supported vocational training to a full Apprenticeship framework, along the lines proposed in the recent ALP paper, 'Government funded vocational learning: preparation for and delivery of full Apprenticeships'¹¹ would speed up the local supply of skilled labour and so reduce the need for much migrant labour.

6. Encouraging a more productive workforce

Publicising more strongly the data now available that clearly identifies the returns from training for both employers and individuals would encourage greater upskilling of the workforce and would allow employers to compete in higher value/higher skills markets. Sample surveys should also be started to identify the benefits of Government funded provision – by this we do not mean counting the number of qualifications achieved, but the impact on the bottom line, productivity, etc, for employers and earning capacity, job progression, etc, for individuals. We know that some employers, such as British Gas, have already collected much data which might provide a starting point.

¹¹ See footnote 3.

7. Public procurement and regulation

As mentioned previously, removal of Government communications budgets will impact directly on businesses' understanding of the changes in Apprenticeships and other provision. More streamlined public procurement would reduce waste amongst both providers and commissioners and building community clauses into tenders requesting greater use of Apprentices and local workers should be considered.

8. Reinvigorating adult and community learning

We have already suggested we see a role for colleges providing or hosting a variety of adult and community learning opportunities that will enrich their local communities, offering up space for local self-organised groups and volunteering activities. In creating the conditions to allow this it would be unacceptable if preferential treatment were given to some types of provider that was not available to others. It would also not be acceptable if strengthening relationships and encouraging local leadership led to a situation where the colleges became seen as the 'primary' contractors for further education, sub-contracting on to others the work-based and other elements of provision that they were unable/unwilling to deliver themselves. Independent providers, who may often be the best providers in an area/sector, must not be relegated to sub-contractors at the whim of colleges. As stated earlier, the skills strategy cannot succeed without independent providers. They must be fully involved in every partnership and all decision making at both the local and regional levels, as well as the national level.

9. Measuring success

We support the principles suggested, linked to the kind of course labelling proposals mentioned previously. Useful data would include success rates (national/provider) and destinations. As mentioned earlier there should be greater surveying of employers and learners to identify the benefits gained.

Summary

Getting the skills system working at maximum efficiency will be vital to the long term well being of the economy. The country can no longer afford the costs of an overly complex and bureaucratic further education system and the time is right for a radical overhaul to give best value for money to both taxpayers (business and individuals) and the Government that is responsible for investing their money effectively and efficiently.

ALP supports much that has been outlined in the consultation and would welcome the opportunity to continue its involvement as the strategy is developed and then implemented.

Any questions or queries about this response should be directed in the first instance to:

Judy Brandon
National Policy Manager
Association of Learning Providers

jbrandon@learningproviders.org
07891 198037