

Full consultation

[Skills for Jobs: A New Further Education Funding and Accountability System](#)

Overview of Timescales to write the response

Response to be submitted by: 6 October 2021

Suggested WYCA Response:

Recommendation to E&S Committee to submit a light touch response to the consultation for the record, and for the Mayor to respond to consultation by letter and aligned to MCA response. Responses to the questions should be limited to those that are most relevant to the findings of the FRSC e.g. on national skills fund and future UKSPF.

Full list of questions:

Part 1 -

Our objectives in reforming the adult skills funding system

Q1. Do you agree with our objectives for reforming adult skills funding?

Following successive changes to the FE system to inform its improvement, the Future-Ready Skills Commission set out the key changes required for the system to work more effectively for learners, business and training providers.

We would also like to see better alignment and integration of the whole system in reforms e.g. apprenticeships. In general, a more ambitious and integrated approach is needed than the one proposed, that truly addresses the current fragmentation of the system and which provides for a more holistic approach to the devolution of funding and powers. The proposed objective of a simpler and more streamlined funding system is not reflected in the detail of the proposed reforms..

Consideration also needs to be given to the overall level of funding and investment for the adult skills system. Spending on adult education is nearly two-thirds lower in real terms than in 2003–04 and about 50% lower than in 2009–10. Structural reforms to the system can only succeed and ambitious objectives realised if there is sufficient investment to enable institutions to deliver the high quality technical provision that is required.

Restoration investment to real-terms seen a decade ago would also serve to raise and broaden participation in adult education, strengthening the prestige and credibility of the system among all sections of the community.

The Department also need to be mindful of the pressing need for a period of stability in the further education sector, following the almost constant introduction of attempted reforms over recent decades. In the past reforms have been entered into too lightly. We need to ensure that the proposed reforms are truly sustainable this

time and that they are introduced in a controlled, phased manner that minimises the disruption for key players within the system.

Greater coherence should be another key principle. There is little consideration of how changes to funding and accountability in further education, designed to get more people into high quality work will align with the wider support landscape, particularly employment support delivered through Jobcentres and careers

Q2. Do you agree with our reform objectives for an adult skills funding system, or are there other principles that should be included?

The devolution of funding and powers is not sufficiently central and integral to the proposals. There is reference made to decisions being made in the right place. If we are seeking to meet local needs then accountability of colleges to local stakeholders should be a key principle. The Department needs to demonstrate a real commitment to devolution as a guiding principle for reform.

A focus on quality of provision is implicit within the objectives but this critical element is not given sufficient weight within the detail of the proposals in terms of ensuring sufficient investment is available.

The consultation does not place enough emphasis on the aspirations of individual learners including those relating to personal development and well-being as well as vocational development. This is one of the main drivers that shapes the profile of provision under the current approach to adult skills. Although learner demand does not fully align with the needs of employers and the wider labour market it cannot be disregarded. A greater emphasis on high quality careers education and, information, advice and guidance is vital to ensuring that the market for learning operates effectively and that a balance can be struck between economic need and learner choice.

True local accountability should be a guiding principle of the reforms. The consultation document rightly emphasises the importance of colleges' role in serving local communities but there is only limited scope for democratically-accountable MCAs and local authorities to participate in the proposed accountability system.

New Skills Fund

Q3. How can non-qualification-based provision most effectively be funded in the future?

Alongside other mainstream funding mechanisms for non-accredited learning, traditionally the European Social Fund has played a key part in supporting those who lack formal qualifications to take the first step to learning. Any successor funding, possibly through the new UKSPF, will need to continue to be offered alongside mainstream funded provision. Locally designed and delivered non accredited provision has a strong track record of meeting the requirements of employers and individuals seeking to progress into, within work or to allow them to change roles. For example, the ESF funded bootcamps in West Yorkshire have been oversubscribed by almost twice the amount of people that places available and have achieved success through the outcomes they have achieved. They have built local

capacity of delivery providers, and have delivered skills required by employers locally. National Skills Fund bootcamps should follow this example to ensure coverage and to meet the needs of local labour markets.

There needs to be continued scope for local flexibility along the lines of the existing Adult Education Budget funding rules.

Q4. How can we ensure this provision is of high-quality?

Department for Education have an important role to play in conducting a national evaluation of non-qualification provision in order to develop a robust evidence base around what works.

Ultimately though, responsibility for skills programmes needs to be devolved in an holistic manner so that local players can ensure that provision is reflective of local needs.

For example, devolving the funding for non-accredited provision and giving accountable bodies such as Mayoral Combined Authorities the responsibility to commission provision locally will ensure only that which best meets local need is selected. Mayoral Combined Authorities work closely with partner local authorities in shaping regional priorities to ensure that the needs of the region and each district are met. Local commissioning will go hand in hand with robust quantitative and qualitative monitoring and evaluation frameworks. This will ensure high quality provision is maintained and continues to evolve and improve over time, by seeking regular feedback on the effectiveness of such provision for both individuals and employers.

In 2020, West Yorkshire Combined Authority secured an ambitious devolution deal, including recognition of its landmark partnership with West Yorkshire colleges setting out a joint plan to align college training provision with the need of the Leeds City Region economy, including the £65 million per annum Adult Education Budget. The partnership, formalised through unique 'Delivery Agreements' for each college, is pioneering in its degree of collaboration and its comprehensive targets and actions, making it the first of its kind in the UK. Developed in partnership between the Combined Authority and each of the seven colleges, the agreements publicly outline how each college will contribute to the Leeds City Region Employment and Skills Plan objectives, Skilled People, Better Jobs 2016-2020 and subsequently the needs of the City Region economy. The targets set for each college aim to address the acute skills shortages faced by the City Region's key sectors: manufacturing and engineering, health and care, infrastructure and digital. The agreements mean the colleges will increase levels of apprenticeships starts, pledging to also increase higher and degree apprenticeship provision within these sectors. Benchmarking provision, alongside the ongoing partnership conversation creates the right conditions for the continuous improvement, through monitoring and evaluation.

The current system of adult and community learning within the FE sector is already the best in the sector with 92% of community learning providers rated Good or Outstanding with Ofsted. Adult and community learning providers are held to the same high standards as colleges within the sector and subject to the same

inspections by Ofsted, the FE Commissioner, Awarding Bodies, IFA etc and this should continue to remain so. There must be a consideration within the reforms for the current quality system of recognising and recording progress, achievement and progress (RARPAP) for non-accredited provision which ensures a high level of quality within those courses which do not have national standards attached to them.

Q5. We would welcome your ideas – particularly from employers – on how we could fund providers for innovative provision currently not funded by the system.

The Future Ready Skills Commission argued for greater devolution of post-16 skills funding in order to drive more innovation in provision so that it can be designed with local employers. To support this, both greater investments in capital and to support staff development and retention in the sector is needed, alongside greater flexibilities in funding streams.

The funding model is also key to innovation, good funding design should drive the right behaviours. Too often output driven provision has led to the wrong behaviours, and to be innovative requires an element of risk which requires a flexible approach to funding where it is aligned to the needs of the labour market.

The consultation

Skills Fund Design

Q6. We would welcome your views on our proposal for a single Skills Fund: do you agree that we should formally merge the existing AEB including community learning, and National Skills Fund (NSF) investment into a single stream of funding?

We welcome the proposal for a single Skills Fund, comprising AEB, community learning and the National Skills Fund as a step forward. This integrated fund should be devolved to MCAs as a single pot. However, we feel that this proposal does not go nearly far enough and there needs to be greater integration of activity in the adult skills space, not least of largely unco-ordinated activity sponsored by different government departments. Adult community learning holds both social and economic benefits, including health and wellbeing, and supporting individuals furthest away from the labour market to re-engage.

Consideration needs to be given to the future role of community learning within the Skills Fund and the role of adult education in re-engaging disadvantaged individuals, not necessarily with a direct connection to entry into a job. We need to ensure that protection is afforded to this type of provision within the funding system and maintain a focus on key objectives around personal development, community cohesion and family learning. Erosion of family learning would negatively impact on school outcomes for example and there would be wider effects on health and wellbeing.

Whilst in West Yorkshire AEB is devolved, Level 3 fund is delegated and with no scope of flexibilities. A delegated funding approach of the kind used for the Level 3

adult offer severely limits the value that MCAs can add in terms of developing local capacity and capability to meet local needs.

The skills bootcamps element of the National Skills Fund should also be devolved alongside the other elements.

Whilst European Social Fund (ESF) is out of scope for the National Skills Fund, once Government confirm the eligibility rules for the new UKSPF, it will be important to ensure the 'people' strand of UKSPF and the respective eligible interventions, are fully aligned to the NSF. In this way this valuable resource and successor funding will complement and add value, key to future economic growth and the government's levelling up agenda which employment and skills is integral to.

Q7. How can we implement this Skills Fund in a way which best supports individuals to access skills which meet the needs of local employers?

There is a case for an elected and accountable regional role in convening employers and employer representative bodies who are often inundated with skills offers so that they can be better served through a coordinated skills offer. This would support employers, particularly SMEs, to better navigate the landscape, address skills gaps and recruitment issues faced by employers and industry sectors. Currently, only 36% of businesses have training plan and 29% a training budget.

Access to training in the workplace is unequal: workers who are already qualified to a high level (level 4+) are almost twice as likely to receive training than their less qualified colleagues.

Q8. We would welcome your views on our proposal to fund devolved authorities through a needs-based relative assessment. Do you agree with this approach?

In order to fulfil levelling up ambitions, a needs-based approach to devolution of funding would be supported. As this could significantly change the funding envelope in some areas, a transitioned approach should be co-designed and agreed between the Department and devolved authorities.

Q9. What elements do you think are important to include in such an assessment?

Funding for learners in non-devolved areas: [do not answer]

For funding of learners who are funded directly by the Department, rather than devolved authorities:

Q10. Do you agree that an activity-based system of funding colleges based on the learners they provide for should be continued or are there other approaches which would be more effective or should be considered? Q11. What are your views on the potential elements (set out above) to include in a simpler funding formula? Are there other elements which should be included? Q12. Do you agree that we should use the same needs-based formula between all areas of the country? How should we balance responsiveness to activity delivered and equal opportunity to access training? Q13. How can we introduce these changes most effectively?

Simplifying funding for disadvantage, learning and learner support through a single additional needs' 'element' as part of the formula

Q14. Do you agree with our proposal to bring together disadvantage funding, learning support and learner support into one element?

We agree with this proposal in principle but practical mechanisms need to be put in place to ensure that the funding is distributed in a fair manner to the different groups within scope of disadvantage funding.

In principle, we agree with simplification of the funding system and the removal of administrative and audit costs to focus funding onto the learner – aligned to a strategic plan. The strategic plan must recognise and guide the need to ensure that this funding is improving the life outcomes for our residents who are disadvantaged and/or in need of additional support.

We welcome the recognition that learners who have been out of work for a sustained period often require additional support – alongside those with learning needs and those residing in disadvantaged areas.

Q15. Are there likely to be unintended consequences we would need to manage?

The current system of 'disadvantage uplift' ensures that funding follows the learner living within a disadvantaged area. This often incentivises providers to work with disadvantaged learners and to target provision in disadvantaged areas. While intended to provide flexibility, providing this as block funding based on demographic data might remove this incentive, particularly where audit and evidence requirements are being relaxed.

If a block funding allocation is to replace this (based on area demographics), this needs to be monitored alongside the number of disadvantaged learners actually supported – ensuring that the provision matches demographic proportions, and need is being met.

Q16. Is there a different approach we should explore?

As above, we are in broad agreement with the simplification proposal and the reduction of funding lost in administration costs associated with calculating, evidencing and auditing individual funding values. While we welcome the flexibility this approach affords providers to deliver support as per their own area needs, we need to ensure there are clear measures of participation, support and outcomes in place to demonstrate the impact and value of this funding. In short – we must be able to ensure that this funding is improving the life outcomes of our residents who are disadvantaged and/or in need of additional support.

We would be happy to engage in future consultations on this matter

Q17. What factors do you think should be incorporated in a measure of additional needs?

The proposed factors are sound: learning difficulties, disabilities, disadvantaged backgrounds, economic status, length of unemployment, travel to learn/access support.

Each organisation should be able to make a case for any additional factors/characteristics within their own support policy, as detailed in paragraph 73.

Q18. Will this help reduce requirements on colleges and enable them to support their learners better?

It will provide an initial additional requirement and cost to the organisation during transition: determining it and rolling out their policy. Support should be provided to Colleges/providers to ensure they embrace and utilise the full flexibility and opportunity this change provides in order to better support learners.

The end reduction of requirements on colleges/providers will remain to be seen, depending on what other outcome measures/evidence might be required. Undoubtedly, the proposal should reduce current administration and evidencing costs.

Funding on lagged learner numbers

Q19. Do you think we should move to a lagged system for the core funding or continue with the current “allocation and reconciliation” approach?

The proposal for a lagged system is broadly sensible and supported.

Q20. Is there another method, not outlined here, that you would prefer?

Upfront funding for growth areas

21. Do you agree with our proposal for a mechanism within the Skills Fund to provide up-front funding for specific growth areas?

One of the challenges colleges face is that they are hampered by the funding post being reliant on last years’ numbers which makes growth harder to fund and therefore deliver so this approach is welcome and should be applied across all funding pots.

Funding for priority growth areas should be properly devolved to MCA areas rather than delegated, as per current arrangements for the Level 3 Offer. MCAs should have greater flexibility around what provision is commissioned, over what time period. The current Level 3 Offer has been hampered by the lack of lead-in time given to providers to gear-up to deliver a narrow and specialised range of qualifications and by the limited time available in which those qualifications need to be completed. There was little consideration of capacity and capability on the ground in the design and implementation of the Level 3 Offer. Allocating a defined envelope of resources to MCAs in order to deliver outputs in line with local employer

need and government's growth objectives would be a more effective approach to achieving the desired outcomes. In line with the general thrust of the consultation, devolved areas should be given greater freedom to determine how best to achieve national priorities using dedicated funding pots.

Q22. Are there other mechanisms which we could explore to achieve this aim of supporting growth in specific skills areas?

Multi-year funding

Q21. Do you agree with our proposal for a mechanism within the Skills Fund to provide up-front funding for specific growth areas?

Yes, this would support growth and a degree of flexibility of funding that is needed to give colleges and other providers (e.g. local authorities) accountability for their provision.

Q22. Are there other mechanisms which we could explore to achieve this aim of supporting growth in specific skills areas?

MCAs are already using their devolved powers to test and trial a variety of mechanisms, including funding flexibilities, for promoting take-up of courses in economically valuable disciplines and in response to emerging and growing needs. This could provide valuable lessons for future approaches in this area.

Funding Eligibility Rules

Q25. Which entitlements and eligibility rules should be maintained in the new system, and why?

Although devolved areas have some power to set their own entitlements and eligibility rules it is vital that the national approach is fundamentally right to ensure coherence across the skills system.

Existing rules seem broadly right in context of limited funding pot. People who are already well-qualified or can afford to do so should take responsibility for their own personal development and expect to pay for their own learning. This should also apply to employer training. Employer investment in skills is far greater than public and individual investment, although more employers need to be persuaded by their peers that there is a connection between increased productivity and a range of practices to make the best use of the skills of their workforce including creating diversity in the workplace, particularly within leadership and management. However, there is a need to think about how we promote wider demand for learning e.g. among those in employment who need to reskill.

There is an argument for broadening eligibility and reinstating previous entitlements for a full level 2 and level 3 for all adults, particularly for qualifications in growth sectors or skills shortage areas. These types of qualification are closely associated with positive labour market outcomes and as the Augar Review notes, the removal of the associated entitlements has contributed to a large-scale reduction in participation.

Q26. If entitlements and rules are significantly reduced in number, in the context of an activity-based and lagged system, how would you expect colleges to allocate funds when the available budget is limited? Are there specific additional rules that you think should be introduced to constrain their activity?

Funding for Independent Training Providers (ITPs) and other providers

Q27. In what circumstances should direct procurement of skills provision be used by government?

In devolved areas, MCAs should continue to hold responsibility for procurement of provision. It is our general view that it is beneficial to have a “mixed economy” of provision, comprising independent training providers as well as colleges and local authorities. We will not be adopting the model hinted at in the consultation of colleges assuming a lead provider / co-ordinatory role and sub-contracting specific elements of provision to independent providers. In the context of a policy shift towards provision that is more responsive to the needs of employers, we feel that independent training providers have an important part to play in meeting specialised needs through responsive delivery models, complementing the broader capacity and capability of colleges. This is reflected in the important role played by independent training providers in the delivery of apprenticeships.

Q28. How can government improve the way it procures provision to ensure it complements existing areas of provision delivered by colleges and local authority providers and improves value for money?

The white paper and consultation imply a reduction in the role of independent training providers and an increased role for colleges in commissioning a wider range of provision at local level. The case for change needs to be more fully evidenced in terms of the scale and nature of any current issues and in respect of the benefits it will bring.

A strong independent training provider sector needs to be maintained in order to drive competition, performance and value for money in the adult skills sector and maximise spill-over benefits from the apprenticeship training sector.

This can be best be achieved through a transparent and open approach to commissioning linked to a clear statement of requirements (such as the forthcoming Local Skills Improvement Plan). In non-devolved areas the full range of local stakeholders need to be fully involved in overseeing these processes.

Q29. How can we support colleges to improve how they commission and oversee provision by providers they will commission from?

The notion that colleges should act as lead provider in an area, delivering and commissioning skills provision funded directly by government, is a relatively novel one and places a greatly increased responsibility on colleges, creating a need for significantly enhanced capacity and capability. In some ways the move to colleges as lead providers runs contrary to the existing direction of travel in skills policy. This is particularly the case since colleges have been running down subcontracted provision in recent years.

If colleges are to take responsibility for commissioning in non-devolved areas this needs to be carefully piloted in advance, otherwise there is a risk that local training ecosystems could be disrupted and needs not met. Few colleges offer a range of provision that is sufficiently comprehensive to meet the full range of needs in a local area. Careful evaluation also needs to be undertaken to show that this approach offers performance benefits and value for money compared to existing commissioning approaches.

In devolved areas MCAs and their partners will seek to fulfil this commissioning role themselves and will be subject to full local accountability in their performance of this role. It could be argued that the proposed lead provider approach bypasses these mechanisms in non-devolved areas.

Needless to say, full transparency arrangements around procurement need to be put in place for large scale commissioning activity, along with measures to ensure there is no conflict of interest and that the best providers in a given discipline receive funding to deliver that provision.

Q30. How can we best support this arrangement for providers that are commissioned by colleges?

The new subcontracting rules developed by the ESFA for adult provision need to be implemented. Management fees need to be minimised to ensure that the maximum amount of funding reaches the learner. As noted above procurement processes need to be open and transparent.

Supporting changes in provision

Q31. How can we best support local areas to improve and expand their offer to better meet current and future skills needs?

Skills Advisory Panels (SAPs), introduced by DfE, are advisory with no specific levers to improve the responsiveness and relevance of education and training provision. Whilst they have a diverse membership representative of the key stakeholders in the system they have no specific resources to incentivise behaviour change.

To develop this model, each region should have a statutory responsibility to produce a five-year skills plan for their area. This would immediately raise awareness of the regional skills agenda among key audiences and lend greater prestige and credibility to the work of Panels. It would also provide a focus for accountability with all key partners in the region signing up to the Plan.

Devolution of the Adult Education Budget (AEB) is a welcome step in moving towards responsive provision for those areas that have received it, but AEB is a declining budget and represents only a small part of the skills landscape, and there is a need for influence and co-ordination on a holistic level, including careers, apprenticeships and loan-funded adult education provision. At present these are run centrally with limited co-ordination at national level between different programmes.

The five year skills plan would serve as the mechanism for a more efficient and effective joined up approach across these different programmes and would provide the basis for addressing the current lack of regional and local direct powers to address gaps in provision. Once a gap is identified a business case needs to be presented to ESFA to make a decision on whether to put the relevant requirement out to tender. This is a protracted and bureaucratic process, which negatively affects the credibility of partners' leadership role in the regional skills system and their perceived ability to bring about change. Five-year skills plans need to come with a discretionary funding pot that would enable regional partners to take an agile approach to ensure that local provision is responsive to emerging needs.

Chapter 2: an accountability system focussed on outcomes

A new performance dashboard

Q32. What measures are most suitable in showing how well colleges are delivering good outcomes? Which measure do you think best matches the purpose we have described in this section?

The details of the technical approach to be adopted for the dashboard indicators are not set out in the consultation and this needs to be clarified before a genuine assessment can be made of the value and feasibility of this approach.

In principle, we support the proposed shift to a greater emphasis on labour market outcomes and measuring responsiveness to local needs in the performance and accountability framework. Indeed, West Yorkshire Combined Authority has already adopted a similar approach as part of its Delivery Agreements with West Yorkshire colleges.

We agree with the suggestion that student outcomes, including employment and further learning outcomes are of central importance. Measuring career progression (in terms of increased earnings and other indicators) is important as is progression within education (from community learning to a level 2 qualification, for example).

Student outcomes including confidence, health and wellbeing, self-esteem, communication and engagement should also be recognised in adult and community learning. [Program-level impact \(the impact that individual services have on the people who directly participate in them\) and community-level impact \(the impact that many different partners, working in collaboration, have on a specific community\) should also be considered.](#)

There are additional more direct measures that could be employed, such as the level of income generated by colleges from commercial sources, including levy and fee income from employers. This gives an insight into college responsiveness to employer needs.

The details of the technical approach to be adopted for the dashboard indicators are not set out in the consultation and this needs to be clarified before a genuine assessment can be made of its feasibility. The Department's outcome-based

success measures for further education show that this kind of approach is hugely technical and complex.

However, a range of fundamental issues need to be overcome if outcome data are to be used to inform performance management in the way that is envisaged. Most notably, student outcomes are not purely determined by the curriculum offered by an institution: there are a whole range of other drivers. Variation in sustained employment and sustained learning rates appear to be heavily dependent on factors such as the age of the student, level of study, provider type, level of deprivation and whether they have a learning difficulty/disability. This needs to be taken account of in the calculation of performance to ensure that a fair picture is presented for each institution. Standard practice in economic studies is to use complex regression methods but this may not be feasible here

Q33. Of the outcome measures you have suggested above, how effective would they be at assessing college performance in a timely way?

Although outcomes measures are of key importance, they do not provide a timely indication of performance since a sufficient time period needs to be allowed for outcomes to be realised. This supports the case for a balanced scorecard of measures, including more timely indicators of quality of provision such as qualification achievement rates.

Q34. Do you agree that underperforming on the skills measure (described in paragraph 120) should be taken into account for planning an Ofsted inspection?

This measure could potentially be used in this way, providing that the measure is felt to be sufficiently robust. In view of the quality of local labour market statistics on which such a measure would be based this would need to be applied cautiously with a range of supporting evidence. It is difficult to answer the question in hypothetical terms until further technical details are provided.

Q35. Do you agree that we should publish colleges' financial health ratings in the Dashboard, as we do not currently publish these?

This could lead to unintended consequences such as an impact on the number of learners choosing an institution and therefore fewer students attending. It is unclear what the benefits of this would be.

Autonomous colleges

Q36. Do you agree with our proposal for new Accountability Agreements?

Accountability framework needs to take into account regional governance and priorities as well as broad based national ones. Achieving net zero may look differently in each local area depending on a region's industrial strengths. It is not enough to only set out the national priorities here. Furthermore, as MCAs are responsible for devolved funding, their determination in the overall accountability of that funding needs to be woven into accountability – creating a separate arrangement for devolved funds is not the best option. There should be overall

national objectives that are locally tailored where there is elected leadership and governance. Under the current proposal colleges in devolved areas face a lack of integration and coherence together with an added burden, arising out of the need to work within multiple performance systems. Overall, the proposed role of MCAs in these arrangements is too narrow and there is insufficient recognition of local accountability. This is surprising in view of the importance that is placed on colleges' role in serving local communities and meeting local needs.

There is benefit in coherently developing shared outcomes and plans within a local labour market, these can still be innovative and led by colleges but allow for consistency in strategy (see response to Q4 for how this works in West Yorkshire)

Q37. Do you agree that Accountability Agreements should incorporate and replace Funding Agreements?

As a devolved area we would seek to reserve the right to continue with funding agreements for adult skills provision.

Exploring an enhanced role for Ofsted

Q38. Which of the options above, or combination of options, would have the biggest impact on shifting college behaviour towards meeting local skills needs?

Q39. How do you think Ofsted can best make meeting local skills needs a more prominent feature within its inspection framework?

This would be welcomed, although the value of this would rely on how consistently it was applied. A key consideration here is how local governance e.g. LEPs and MCAs, can support and be involved in inspections to triangulate the information and data..

Q40. Are there any other changes to Ofsted's inspection approach that would support improvement in this aspect of college performance?

A recognised role for MCAs with FE Commissioners could also be considered

How the system will work for other post-16 providers

Q41. Do you agree that our accountability proposals should apply to all grant funded providers on a proportionate and relevant basis?

Yes, but working with regions to ensure that the right mix of provision is available to meet the outcomes needed across the range of provision available.

Apprenticeships

Q42: How might apprenticeships best feature in the new accountability system?

Support and intervention

Q43. Do you agree with our plan to give the FE Commissioner this role with a renewed focus on driving improvement and championing excellence?

In principle yes and with a strengthened link with MCAs and LEPs through a formalised role in working with FE Commissioners

Q44. What lessons can we learn from our current approach to formal intervention to help us design this new approach?

Q45: Do you agree with our proposals to create a simpler and straightforward three stage approach to improve college performance?

Q46: What specific actions do you think we need to take to ensure that performance issues are dealt with quickly and effectively?

Improving data and reporting

Q47. Do you agree with our high-level proposals to improve student data collection?

Audit and assurance

Q48. How do you think we should go about achieving our objective of keeping requirements to a minimum while maintaining confidence in the system?

Implementation and next steps

Equalities Assessment

Q49. Please provide any information that you consider we should take into account in assessing the equalities impact of these proposals for change. (For example, do you believe any groups with protected characteristics will be impacted by the changes and if so, how?)

An emphasis and focus on employment outcomes as a key measure of accountability and funding will lead to a risk of exclusion of those with protected characteristics who may rely on additional support from than qualifications and skills training in order to progress towards, secure and stay in work.