

Skills for Londoners Framework consultation

May 2019

The Association of Colleges (AoC) represents colleges in England incorporated under the Further and Higher Education Act 1992.

Question 1

Does the ESFA's definition of London's "fringe" accurately reflect reasonable travel-to-learn distances for London's learners? If not, what other measures might be more suitable?

Answer 1

ESFA's definition of London fringe is used in the primary and secondary funding formula and is therefore not well known among colleges. At first sight the list of 32 London fringe areas seem to cover a sensible travelling distance from the GLA boundary but the list does not include a couple of areas like Stevenage, Wycombe and Farnborough which are close or locations like London Stansted and London Luton airport which, whilst outside the fringe area, are obvious travel to work areas for London residents.

The shift towards more local, city-based commissioning is new for adult education. We recommend that GLA takes a number of steps when implementing this policy:

- Review current Individual Learner Record data to check current travel patterns
- Confirm what will happen in terms of defining the location of grant-funded providers, some of whom have sites both inside and outside areas – our working assumption is that the main campus (college registered address) will generally determine eligibility.
- Introduce a review procedure (with rules) to allow for exceptions among the out of London providers – for example to facilitate meeting the needs of a national employer
- Broker a relationship between current sub-contractors and London providers to allow for the continuation of specialist or niche provision, where appropriate.

Question 2

What other areas relevant to Mayoral priorities should be supported through the Skills for Londoners Innovation Fund?

Answer 2

The consultation lists six priority areas for growth requests. We would suggest that to better meet London's labour market needs the inclusion of engineering and built environment is added within the sectoral priorities. An additional priority which focused on responding to local and sub-regional priorities would enable stronger engagement with the Skills and Employment Boards and support the translation of sub-regional skills strategies into action.

GLA should also set some funds aside to support higher funding rates – particularly in priority activity like English and maths and perhaps testing some fully funded Level 4 and 5 programmes. ESFA has used the same cash rates for AEB since 2013 and did not increase the previous rates for the previous four years. Inflation has eaten away at the value of available funding and forced colleges to hold down pay and teaching hours and to close courses with smaller group sizes to increase overall efficiency.

It is essential that the growth funding process does not instigate additional reporting and monitoring requirements and that the GLA resists this becoming 'project funding'. Given the proposed decision-making timeframe we support the proposal that delivery could take place over more than one academic year.

It is however, important to note that the plan to increase average public funding for ESOL and Digital by introducing full funding support means that there are some areas where there will be a need to grow funding simply to maintain existing levels of activity.

Question 3

Would fully funding ESOL provision up to and including Entry Level 3 be sufficient to reduce barriers to provision? Are there other barriers to participating in ESOL provision we should be aware of and looking to address?

Answer 3

The plan to fully-fund ESOL will reduce barriers for students but will not be enough on its own to reverse the impact of ten years of budget reductions and fixed cash funding rates. Colleges fully support the Mayor's ambitions for a more socially and economically inclusive London and their ESOL provision is key to the achievement of this goal. However, without additional investment then the higher funding required for ESOL will simply displace other activity and result in an overall reduction in learner numbers.

Clearly colleges must retain responsibility for the mix and balance of provision but could find themselves unable to meet local need if this is introduced as an entitlement without additional resources.

We would suggest it is important for the GLA to model the potential impact of this proposal, particularly in the light of the current commitment to fund learners who are employed and in receipt of a low wage, which is anticipated to enable 40,000 more Londoners to access ESOL provision.

The plans outlined in the consultation to review provision, to use European Social Funds to address gaps and to use commissioning powers to support innovative approaches are all sensible additional steps. We would anticipate that barriers associated with childcare and travel costs will emerge and would welcome these being addressed, along with support to attract and develop ESOL practitioners.

Question 4

Do you support the creation of an enhanced London Digital Skills Entitlement? How should City Hall look to introduce this entitlement?

Answer 4

We support the plan for a new Digital Skills Entitlement, but we are not sure there is a case to have different rules in London than elsewhere on this issue. There have been cases in the past where IT courses have been oversubscribed when offered free and where there has been a swift expansion in activity which has been unsustainable. We would reiterate the point that we support in principle the concept of an enhanced London Digital Skills Entitlement, which would extend the national entitlement to all Londoners aged over 19 and requiring digital skills training, but only if funding is available to meet other priorities.

We suggest that GLA seeks to influence the development of the new entitlement and the criteria for national eligibility and presses for additional funding to deliver the entitlement. The GLA may wish to monitor the impact of this proposed change quite carefully in the first two years.

Question 5

What interim measures could City Hall put in place to record and demonstrate the impact of Adult Community Learning in London?

Answer 5

We recommend GLA uses a basket of metrics to measure ACL activity, performance and impact including:

- Participation of people with social, economic and educational disadvantage. A broad-based approach should be used to define this. It could include those with learning difficulties and disabilities and those who are on low income.
- Progression to basic skills, ESOL, Level 2 and 3 courses covered by the statutory entitlements
- Progression on a range of health and well-being indicators; self-evidenced by learners in a non-obtrusive manner
- Learner satisfaction as evidenced from surveys
- Ofsted inspections

AoC has participated in the research being undertaken by Learning & Work Institute and contributed strong views; including those regarding the burden of evidence-gathering. We would reassert that destination data for learners who have completed their provision could be most economically collected at a regional level, post-learning – and fed back to providers as appropriate.

We would also suggest that the agreed metrics to record and demonstrate impact of Adult Community Learning should be applied to provision type rather than institution type; i.e. increasingly be viewed as ‘provider-neutral’

Question 6

What changes should be made to AEB funding to address the challenges identified in the SEND review?

Answer 6

There are fundamental and well-evidenced issues regarding the funding of high needs students; essentially Government needs to insist on better quality Education Health & Care Plans (EHCP) and fund them adequately. The SEND review points to a woeful lack of provision to meet both current and projected demand. There needs to be significant investment, both capital and revenue, targeted geographically but also clearly focussed on learner progression in terms of employability, independent living and social integration.

Question 7

What additional learner support is needed for learners with SEND to improve their retention, achievement rates and progression?

Answer 7

It is important to recognise that the vast majority of learners with SEND do not have an EHCP and are catered for generally in all colleges. The most significant thing the GLA could do would be to undertake a comprehensive review of the restrictions currently operating relating to Additional Learner Support – particularly at ‘low’ level support. We would anticipate a requirement for greater flexibility of funding rules and the need to clarify access to such funds in order to maximise use

Question 8

What more could City Hall do to support low-paid Londoners to get the skills they need?

Answer 8

The introduction of low wage fee remission in 2018-9 is a new initiative and the plan to extend the threshold in London in 2019-20 has not yet happened. As a first step, GLA should assess the impact of both changes by analysing data and by gathering examples of impact and good practice from colleges and others.

GLA could also conduct a review of the current funding rules associated with learning in the workplace to identify which present barriers to upskilling and advancing the careers of low paid Londoners. A more permissive approach to funding 'stepping stone' (non-accredited) provision with work readiness focus, recognised by employers, would be helpful as would explicit support encouraging the uptake of English and maths – this could be through campaign work but also through weighting funding rates to support additional delivery through selected vocational programmes which match, perhaps, with Mayoral priorities.

In addition to this, GLA could use its wider convening role and its high profile to improve the links between employers and the adult education system. Colleges already engage with employers at various levels from their role in governance, advising on courses, providing work placements for young people and apprenticeship training but there is much more that could be done to help the supply and demand side for skills to work better together.

Question 9

What more could City Hall do to support the sector to boost retention and achievement rates in English and Maths provision?

Answer 9

GLA's plans to commission research into participation and achievement in basic English and maths should be useful. There has been a lot of attention and focus from DfE and Ofsted into English and maths for 16 to 18 year olds but less when it comes to adults. We agree with the plan to use the research to devise a package of support for 2020-21.

We anticipate that the research will demonstrate a need for initiatives that support the upskilling of the workforce and would suggest considering incentives to participate; for example, a Mayor accredited 'Dual Professional' award. Importantly flexible RARPA based programmes and a higher funding rate for the delivery of English and maths would better recognise the costs of provision and the critical link to learner progression both into and whilst in-work.

Question 10

Should City Hall look to support, promote or fund higher level skills (Level 4 and above) skills through the AEB? If yes, which groups of learners, levels and sector subject areas should be prioritised and how?

Answer 10

London has large number of universities, high number of higher education students and attracts significant numbers of recent graduates from the rest of England, Wales and continental Europe. GLA has identified the need to increase participation from those from black and minority ethnic backgrounds and for those with disabilities. There is a case nationally for developing a stronger higher technical education offer to help people into highly skilled work without so many people needing to take a full-time residential degree programme. In London this is particularly relevant in the light of recent research findings in the *Higher Education Journey of Young Londoners* and the GLA commissioned research from the Social Mobility Foundation.

Colleges in London support the need to invest in Levels 4 and 5, particularly to enhance the professional development associated with in-work progression. Colleges however, need a risk sharing approach where the costs associated with provision is nonviable, particularly where learner demand is low – even where employer skills needs are high. Colleges should have discretion in which higher level skill programmes to fully fund, reflecting college specialisms.

Advanced Learner Loans are a known barrier for many learners at Level 3 and above and there is much more that can be done at a regional level to the address these issues – in terms of both practicalities and perception. In addition, the requirements of the Office for Students could mitigate against any expansion in provision and may even lead to a decline.

There is, though, a risk in GLA shifting funding towards this activity in advance of the government's post 18 review and at a time when the demand on the adult education budget is already high.

Question 11

What more could City Hall do to tackle skills shortages in London's key sectors?

Answer 11

Colleges need little encouragement to align their provision with London's sectoral and occupational skills needs. Unfortunately, learner demand and occupational skills needs are not always aligned. There is more that could be done to improve information about current and future needs and to ensure there is high quality information advice and

guidance. This should be a high priority for the Skills for Londoners Board and the planned Knowledge Hub.

Initiatives like the Mayor's Construction Academy can also help to create a stronger sense of sectoral priorities and a means to work collaboratively.

Question 12

What more could City Hall do to support colleges in dealing with the implications of Brexit for staff and students?

Answer 12

The government's immigration white paper starts from the assumption that the UK will leave the EU after which there will be a transition period; that Parliament will pass necessary legislation and the Home Office will develop new IT systems capable of handling an amended but higher volume migration regime. Five months after the white paper publication, it already seems unlikely that the government will have all three things in place by mid-2021. Some things may be in place – the Home Office's EU Settlement Scheme has got off to a good start – but these are reforms on a once-in-a-generation scale so business as usual is likely to continue in the short-term: definitely in 2020-21 and probably in 2021-22.

London has strong links to continental Europe and high numbers of EU nationals. A key role for GLA is to provide reassurance that people from all backgrounds and skills are welcome.

Question 13

How could the AEB be used to fund or part fund entitlement to a second Level 3 qualification for specific disadvantaged groups of learners, or to tackle skills shortages in particular sectors?

Answer 13

There is a good case for an extended Level 3 funding entitlement, particularly to support sectoral priorities. This could be by extending the entitlement to those aged over 24 or by fully funding a second Level 3 in subjects supporting sectoral priorities. However, the budget is under pressure, new systems are being developed and the interaction with Advanced Learner Loans would need to be worked through. Nevertheless, colleges in London are supportive of this proposition and would suggest introducing a pilot in 2019-20 to assess the impact.

Question 14

What more could the Mayor do to support and champion London's FE and Skills sector?

Answer 14

The Mayor's support for the Love Our Colleges campaign has been welcomed. The Mayor, Assembly members and GLA staff are welcome to visit colleges, to engage with learners, staff and governors and to work with the sector across all its programmes both the ones that are directly funded via the adult education budget but also other activities. London's colleges are a resource for the city and while the immediate priority of institutions will be to meet the needs of the students and employers who directly engage with them, there are also many ways in which the sector can support wider city goals ranging from economic regeneration to improving mental health. A better understanding of what colleges can do - and what they can't currently do - can only help.

Association of Colleges
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