

## BIS review of IACL – WEA response

**Q1: Do you agree that BIS-funded IACL contributes to the development of the Big Society and complements the delivery of other Government policies. If yes, which policies and how might IACL's contribution be measured?**

Yes. As outlined in the consultation paper, IACL makes a number of contributions to the Big Society initiative. It links directly to other government policies in particular localism, social cohesion, health promotion and well being, cultural transmission, intergenerational learning and digital inclusion. However, because IACL has many purposes and many outcomes, measurement is less easy than in single focus enterprises. This means that efforts to provide simple and standardised impact measures can prove difficult, expensive and inhibit innovation.

**Q2: Should BIS-funded IACL be aimed solely at supporting specific outcomes such as progression to training and employment, or should it enable progression in a broader sense?**

It should seek to enable progression in a broad sense. To narrow it down to training and employment would be at odds with Big Society intent. This budget is tiny in relation to the overall Skills budget and its impact must be maximized – especially in the context of current social, community and economic change. Adults who failed to achieve their full potential at school often have negative attitudes to formal education. For this group, a return to education is often prompted by an initial interest unconnected with career planning or employment outcomes. An example of this is the WEA's "Helping in Schools" programme where learners are motivated initially by their desire to support their children but engagement with the programme often leads to a formal training programme or employment. It also contributes to school performance and the life prospects of the learners' children.

**Q3: If the latter, what other types of progression are relevant and how could they be measured?**

IACL embraces a wide range learning programmes and opportunities customised to meet the needs of individuals, communities and localities. This means that there a wide range of potential progression outcomes. For the individual progression can mean a range of things including access to further learning, increased civil engagement, greater confidence and well-being, decreased dependence on public health services, improved mental health, improved parenting skills, and progression to employment. Universal measures are likely to be difficult to develop due to the range of outcomes and the fact that the impact is not necessarily immediate or indeed the single factor causing progression and change. Rather it is one of the necessary contributory factors.

**Q4: What should be the respective national and local roles in relation to IACL?**

We agree that the benefit of the current BIS approach to BIS funded IACL is that it is flexible rather than prescriptive, with opportunities for significant variation in content and delivery according to local needs. For this approach to thrive in the context of the localism and Big Society agendas it is essential that Government should define the parameters for BIS investment in IACL through a clear statement of aims and objectives.

Q5: What (if any) steps could facilitate the changing role of central Government in IACL?

No comment on this question.

Q6: What are the implications of seeking a wider local provider base?

This is a relatively small funding stream. Given this care must be taken to make sure that any extension of the local provider base does not destabilise existing providers. This is particularly important if a decision is taken to redistribute funds according to new criteria.

Q7: What would a localised IACL offer mean for providers, such as the Workers' Educational Association, delivering learning across localities?

The WEA has a highly localised IACL offer delivered through partnership working with small community based organisations. At present, there are established networks and communication channels between providers and communities which facilitate the best local use of resources.

In order to ensure a diversity of provision we think it is important for the model to be able to accommodate organisations working at local, regional and national levels. This is particularly important not only for the WEA but also for organisations which cater for particular communities of interest such as disability.

Given the above it is important that any new framework provides opportunities to strengthen partnership working and does not create new bureaucratic structures which increase organisational overheads and thus reduce the impact of the funding on individuals and communities. This is particularly important given the relatively small amount of funding available for IACL.

Q8: Should BIS-funded IACL be targeted or universal, and why?

Universal. Centralised targeting increases transactional and administrative costs, reduces potential class size and fee income and can lead to learning ghettos. However universal holds within it the principle that public resource should be prioritised to support learners who have had least educational opportunity. IACL should always promote the value of lifelong learning. To do this a greater proportion of resource has to be used to support people in establishing a lifelong learning behaviour and in facing periods of change in their lives.

Q9: What are the key challenges to generating fee income and what associated solutions would encourage more sophisticated approaches to income generation?

The key challenge is changing the culture of IACL provision in relation to fees. The approach may not need to be too sophisticated; set fee proportion targets balanced with objective disadvantage indicators and let providers determine and change individual fees within this framework. It will be hard to promote an enterprising culture with too much centralised fee regulation.

Q10: In a localised model, what are the key challenges and associated solutions that would secure accountability for taxpayers' investment?

If this type of model is to work effectively it is crucial that the Government establishes clear aims and objectives for the funding stream as outlined in question 10. Paragraph 15 of the consultation paper identifies the key characteristics of the framework which will need to be established to ensure local accountability.

Q11: Which, if any, of options a) b) and c) presents a proportionate approach to measuring impact? Are there any alternatives?

- a) Responsibility for measuring impact is left to the recipient of funding and there is no attempt to capture a national picture.
- b) Responsibility for measuring impact is left to the recipient of funding and this information is aggregated to present a national picture.
- c) In addition to the recipient of funding taking responsibility for measuring the impact of IACL investment, there could be a national learner survey.

We need a combination of options a) and c). Option a) ensures there are self evaluating providers. However there could be value in having an annual national learner survey as long as the questions genuinely reflect the range of intentions and outcomes that IACL learners have and avoids the inappropriate and costly mistakes of generic frameworks designed to meet the needs of the broader FE sector. Measures of impact should make sense to the potential learner and – with the breadth of IACL – these will need to embrace a range of recognisable impacts that people can see in the context of their lives rather than in a narrow consumer sense.

Q12: What core information should recipients of BIS investment have to provide in relation to learner characteristics and learning activity?

Information requested from providers might include:

- 1 Learner hours
- 2 Learner hours÷BIS investment expressed as £s per learner hour
- 3 Fee income from learners and other sources as £s per learner hour
- 4 Equality and diversity indicators expressed as percentages. As a minimum should include: age characteristics, ethnicity, gender, and disability
- 5 Proportion of learners and learner hours delivered to learners in receipt of means tested benefit
- 6 Average length of learning programme
- 7 Number of Community Learning Champions registered and working to support provision

Q13: How can administrative data be used effectively to map fee income and learner disadvantage?

The simplest solution may be to map the level of participation by learners dependent on the receipt of income related benefits. This could be combined with objective disadvantage postcode data. Care must be taken to take into account rurality in any model since population density and transport costs make work in these areas particularly challenging.

Q14: What factors should be taken into account in the distribution of BIS funding for IACL?

There are well established processes for the allocation of resources to local communities based on factors such as population level, indicators of social deprivation and rurality. In addition, a proportion of funding (at most 10%) could be top sliced to provide opportunities to promote innovation, change and the sharing of best practice.

Q15: Which, if any, of options a), b) and c) would best secure more localised delivery and are there alternatives that could be considered?

- a) Funding allocated directly to providers.
- b) Single local commissioning body (or commissioning partnership).
- c) Tender out a few large contracts across England.

All three options have strengths and weaknesses which suggests that a mixed model may be the most appropriate.

Having said this, it is critical that whatever approach is adopted care must be taken not to destabilise the existing provider base. The overall amount of funding is relatively small and this funding achieves a high level of leverage.

Finally, any decisions in this will be heavily dependent on other policy developments including the impact of decisions around Minimum Contract Levels and the proposals in the Localism policy consultation document in relation to the separation of commissioning and delivery.

Q16: Should BIS IACL funding be used to fund capacity building and innovation?

Yes. This should be an optional element of all grants capped at a maximum of 10% of grant value. Providers would need to report on this separately and its use made conditional on engagement in ongoing research and dissemination.

In addition we would support the establishment of a small national funding pot to promote innovation. This could be modelled on the Adult Community Learning Fund. However, given the difficulty in mainstreaming initiatives of this type we would suggest a cap on the amount of funding used in this way to a maximum of 2.5% of the available resources.

Q17: If yes, how should funding be balanced and what type of activity should be funded?

The bulk of this activity should be determined locally. The approach outlined in 16 would allow providers to develop activities which supplement the current learning offer. This would enable providers to include outputs such as the establishment of Community Learning Champion schemes, learning circles and support for other forms of self-organised learning as fundable outputs.

We are less convinced that the development of online learning resources should be funded through this funding stream unless they could be funded from within the innovation fund proposed in the answer to question 16. In other words, initiatives of this kind should be piloted in localities as innovation projects competing for resources alongside community led initiatives.

Q18: Is there a need for quality assurance arrangements to be changed in light of the potential changes to BIS-funded IACL? If yes, in what way?

True and transparent self assessment remains key to provider improvement, development and innovation. Because the majority of IACL remains non-accredited there is no genuinely reliable achievement data to replace proper inspection to confirm self assessment. This inspection, however, could be cost effective and robust if it was based on very short notice (24 hours) visits by a single HMI to test thematic issues. This HMI would have discretion to call in a full inspection if problems were identified. Alternatively, to build a reflective practitioner network, there could be a required peer visit model linked to HE research to promote staff and teaching development. Whatever, it needs to be simple and reflect the actual purpose and outcomes of IACL.

Q19: What adjustments to current workforce development arrangements in England would best support the new vision for IACL?

The current arrangements are too based on generic FE full time and subject teaching standards and the overseeing institute is not held in high regard by many tutors, particularly those on shorter contracts. IACL needs qualified tutors undertaking CPD with proper recognition of higher education and other teaching backgrounds and a smaller teaching qualification to support their understanding and capacity to work within and develop IACL as it is conceived in the consultation document.