

**FURTHER EDUCATION
COMMISSIONER ASSESSMENT
SUMMARY**

Wandsworth Borough Council

FEBRUARY 2015

Assessment

Background

- 1) Wandsworth Borough Council's Lifelong Learning Service (WLLL) is part of the Education and Social Services Department and acts predominantly as a commissioner of adult and community learning, other Workplace learning (including traineeships) and apprenticeship delivery. The Borough has a small amount of direct ESOL and Health and Social Care delivery and it provides Intermediate and Advanced Apprenticeships in Business Administration. It commissions mainly non-accredited programmes for adult learners in Community Learning, which is delivered, almost in its entirety, through a large network of local sub-contractors. 7 sub-contractors deliver most of the Apprenticeship provision in 13/14 with the majority of learners being located outside of the sub-region and others significantly outside of London.
- 2) Following the Skill's Funding Agency's notification that Wandsworth Borough Council Lifelong Learning Service had been graded as inadequate by Ofsted at its most recent inspection, the Minister for Skills decided that the FE Commissioner should assess the position of the local authority in line with the government's intervention policy set out in '*Rigour and Responsiveness in Skills*'.
- 3) The FE Commissioner's report is intended to advise the Minister and the Chief Executive of the Funding Agencies on;
 - a) The capacity and capability of Wandsworth Borough Council's leadership and governance to deliver quality improvement within an agreed timeframe;
 - b) Any action that should be taken by the Minister and/or the Chief Executive of the funding agencies to ensure the delivery of quality improvement (considering the suite of interventions set out in '*Rigour and Responsiveness in Skills*'); and
 - c) How progress should be monitored and reviewed, taking into account the Agency's regular monitoring arrangements and Ofsted's monitoring visits.

Assessment Methodology

- 4) The FE Commissioner requested that two advisers visit the Wandsworth Borough Council's Lifelong Learning Service over the period 24th February – 25th February 2015. They received briefing information in advance from the Skills Funding Agency and met with those with overall responsibility for the service, managers, staff and learners. They also met with some subcontracting providers and examined the documentation on the service that was available.

Governance arrangements

- 5) Governance arrangements currently are inadequate and actions to improve accountability are too slow. Although lead Councillors and senior managers have a clear commitment to apprenticeships and to the role played by community learning in

addressing inequalities in the Borough, this has not translated into a clear strategy for the service. It is not clear how the Borough's Employment and Skills priorities influence curriculum planning or commissioning. The rapid expansion of apprenticeship sub-contracting at significant distances from the Borough does not appear to have been endorsed by senior staff or members. Growth has been more important than localism for the Lifelong Learning team and this has not been endorsed by the Borough leadership.

6) There has been a lack of effective arrangements to monitor the service and its impact. There is insufficient transparency around the balance between Borough's management overheads and the monies allocated to sub-contractors, and no system for evaluating the value for money provided by the service beyond an ambition for it to cover its own costs in total. Overall there has been insufficient scrutiny of what the service offers and how it aligns to Council priorities. Whilst the Post Inspection Action Plan (PIAP) recognises the need to improve scrutiny, the meeting to agree future reporting is not scheduled until March 2015.

7) Whilst a 3 year Development Plan is in place, it is difficult to see the strategic links to employability and progression in practice. The plan is only updated annually and there appears to be no impact if actions have not been delivered. Both the Development plan and overall supervision have had too great a focus on participation and little focus on quality or impact. There is an urgent need to clarify the offer for the 15/16 curriculum and commissioning plan which flows from the overall Borough strategy before sub-contractors finalise their offer. The current aim of providing 'something for everyone...' may need to be adjusted to improve outcomes for key communities. The annual September 2014 Progress update records where targets or actions have been under achieved but there do not appear to be any implications for missed targets.

8) Senior staff and council members are keen to see improved links with the Borough's overall strategy for employment and skills especially to their Nine Elms plans, Europe's largest regeneration project and recognise the value of strengthening local partnerships. The Council values the impact the adult community learning service has on individuals and disadvantaged communities and there is much support for that activity. The Council are totally committed to improving access to apprenticeships for their own communities, especially young people. There is a growing recognition that it might be advantageous to reduce the size of the apprenticeship programme to give it a greater local focus. Scrutiny arrangements now need to ensure that all sub-contracting arrangements for Apprenticeships comply with SFA requirements and that sub-contractor details are reported to the Skills Funding Agency. The Borough describes its own Putney School of Arts as a sub-contractor even though its staff are Borough employees.

Leadership and Management

9) The Lifelong Learning team consists of 25 staff led by the Head of Lifelong Learning who reports to the Assistant Director for Prevention and Intervention and is responsible for the delivery of the service – adult and community learning (ACL), direct delivery and apprenticeships but his responsibilities also encapsulate some ESF, Big Lottery and work experience activity. His role is ensuring that the curriculum is developed in response to central and local government priorities, is insufficiently well defined. The Head and several of the team have been in post for a considerable time and the allocation of funds seems more closely aligned to historical roll over rather than through regular strategic decision

making. This team manages the range of activities beyond those funded by Skills Funding Agency (SFA).

10) This team has been subject to significant churn over the past year and is still not stable. Many role holders are temporary and new permanent appointments are still awaited. The result is that roles and responsibilities remain unclear. Many role holders have very broad responsibilities across more than one area. The overall lead for Apprenticeship delivery through sub-contractors, only managed six monthly visits during 13/14 owing to competing workload demands. Growth in apprenticeships was not reflected in team structure and responsibilities. Consequently, quality monitoring of apprenticeship delivery was inadequate leading to the very low levels of apprenticeship success in 13/14.

11) The Lifelong Learning team's strategy is not clear to all sub-contractors and apart from the 3 main sub-contractors' delivery, 29% of funding is allocated through an expressions of interest process. There is a funding panel consisting of members of the internal team and 2 external members to ensure objectivity. Many funding requests are agreed for vulnerable learners or to support widening participation and well-being. There are no attempts, for example, to use contracts for ACL to incentivise providers to focus on priority curriculum through providing double weighting for some SSAs. The Development Plan refers to the systematic gathering of local learner needs and demands but there was no evidence available as to how learner demand directly influences curriculum provision.

12) The role of the Lifelong Learning Development Group (LLDG) which is chaired by the Head of Lifelong Learning is not clear. It is not the commissioning group and has no clear role in the monitoring of quality or the PIAP. There appear to be some operating tensions and lack of clarity of objectives between the Lifelong Learning Service and the Economic Development Unit, although a paper to Council in February 2014 did attempt to clarify the importance of the LLL's contribution to localism.

13) Monitoring of adult and community sub-contractors has been less demanding for the WLLL team as success is determined by participation rates. ACL learner success rates are high on mainly non-accredited provision but none of the performance management arrangements for subcontractors has been clear or effective. Contracts are too heavily focussed on participation targets and data compliance. References to quality measures such as success or destination/progression are limited and given less priority or are not stretching. For example the contract for large ACL provider has financial penalties for under recruitment and failure to return data, but not for failure to achieve the success rate target. It does include a target of 80% of Teaching, Learning and Assessment observation grades to be good or better, and 95% to be requires improvement or better. It is not clear how these are verified. Contracts have targets for priority groups e.g. learners with declared disabilities, older learners, adults from areas of high deprivation and learners from BME groups but these targets are not linked to financial payments. In Apprenticeship contracts there is no explicit clause relating to WLLL having right to observe training and assessment practice.

14) The Lifelong Learning team recognise that the current profile of 92% good or better grade outcomes for the observation of teaching and learning in adult and community providers is unrealistically high and may be indicative of over grading. Consequently, they are providing increased CPD opportunities and paying teachers to attend. They are also

increasing the requirements for the regular auditing of schemes of work and individual learner progress data.

15) Data management has been poor although steps have been taken to improve access through a recently acquired kite marked software package. Up to now there has been no comprehensive formal template reporting. It was difficult to evaluate the Borough's direct provision as no data was made available.

Quality

16) Inspection

Ofsted's inspection of WBC on 8-12 December 2014 (Appendix B) was confirmed on 19th January 2015 at overall Inadequate (Grade 4) with the following grades:

Inspection outcomes

Overall effectiveness of provision	Grade 4
Outcome for learners	Grade 3
Quality of teaching and learning	Grade 3
Effectiveness of Leadership and Management	Grade 4
Sector Subject Area	
Health, Social Care and Early years	Grade 3
English for speakers of other languages	Grade 3
Visual arts	Grade 2

17) The Post inspection Action Plan has been developed by an experienced consultant who has been working within the Lifelong Learning team over the past few years. This plan has not been informed by key partners and as at late February 2015, the main sub-contractors had not seen the plan. Meetings with key partners to increase ESOL accreditation do not appear to have taken place and the ESOL PIAP is weak with late milestone expectations and no recorded progress. The overall PIAP does not use any system of RAG rating to highlight progress or variance from plan and there is no objective monitoring. In fact under the current arrangements, the monitoring of the PIAP is the responsibility of its author. It is unclear how the quantitative targets within the plan have emerged.

18) The PIAP focuses heavily on the introduction of new monthly monitoring arrangements, although these were described as an informal addition to the more established 3 monthly reviews. Some timeframes for completion fail to recognise the need for urgent improvements. Although some meetings have taken place there is no detailed update in the plan beyond generic descriptors making early intervention with specific sub-

contractors impossible to monitor. Many of the review dates are months away from the initial Ofsted judgements and therefore much of the progress column remains blank, especially relating to improvements in English and Maths. The responsibilities of the individual provider as opposed to the Lifelong Learning team are insufficiently clear. Sample minutes from the new monthly arrangements are very descriptive and still light on quantitative data and the key timely actions required

19) The PIAP does focus heavily on apprenticeship improvement and one apprenticeship sub-contract is already identified to be discontinued. The need for rapid functional skills improvement is recognised but the relationship between assessors sourced directly by the Borough and the responsibility for individual sub-contractors is insufficiently clear. Generally progress improvements and their impact need to be much more detailed. The plan relies heavily on the impact of new 'consultant' role holders and again is too early to see their effectiveness.

20) The actions to remedy the safeguarding weaknesses identified by Ofsted are largely complete in that a central file is now available. It is too early to judge whether monitoring arrangements will be effective. Minutes from a sub-contractor performance monitoring visit held on January 2015 judges some safeguarding actions as 'potentially met' rather than 'met'.

21) There is no requirement for all teachers to be observed annually, although the Lifelong Learning team are increasing CPD opportunities and offering observation support to small sub-contractors. The contract for large ACL sub-contractors requires 66% of teaching staff to be observed (graded). There is no explicit requirement in other contracts demonstrating a lack of consistency in the approach to independent observations. Plans are now in place to retain monies for apprenticeship sub-contractors until achievements are known.

22) Whilst there is recognition that progression data analysis is key, no evidence of progress on this priority is yet available. The WLLL team accept that they completely underestimated the improvement journey required for functional skills for apprentices and failed to check that learners were enrolled on the right levels with sufficient rigour.

23) WLLL requires providers to supply WLLL with the CVs for all staff delivering qualifications and ensure that the staff delivering the qualifications are fully qualified assessors and verifiers as appropriate. The provider is expected to provide ongoing CPD for staff but this is being supplemented by a WLLL central Continuous Professional Development (CPD) offer.

Finance

24) The Council provided financial information for the Lifelong Learning Service for the academic year 2013/14. Wandsworth receive funding of £2.5m for Community Learning and Adults Skills Budget, which accounts for 74% of the income of the service. The balance comes from ESF contracts and some charges for services. From the information provided, central and departmental recharges of £84,000 account for 2% of the total income. The costs of the Lifelong Learning function itself totals £1.1m, although from the information provided it was not possible to determine how much of this is for direct

delivery of services and how much is management overhead. A further analysis of the costs of delivery and management would help the Council determine if the Lifelong Learning Service provides value for money.

25) Wandsworth sub contract the majority of the provision funded by ACL and ASB. For the ASB sub-contracts, Wandsworth retain 17% of the funding generated to cover central costs. It is not clear from the financial information provided, how this income compares with the costs of managing the sub-contractors, although taking in-house and sub contracted delivery together, the Adult Skills delivery is reported to have broken even in the academic year 2013/14. For the ACL provision, there is no percentage retention on each contract, instead Wandsworth keep a lump sum for management costs and the small amount of direct delivery. In academic year 2013/14, £850,000 was paid to sub-contractors with £523,000 being spent on in house delivery and management costs. Within the "sub-contracted" ACL provision is a payment of £91,000 to the Putney School of Art and Design, which is currently within the ownership of Wandsworth Council. There are no measures of efficiency such as average class size, and each provider is free to determine its own fee policy. It is not clear how the Council ensures that the use of funds provides value for money.

Issues

- Senior staff and council members have failed to provide sufficient scrutiny of the service or to provide clear strategic direction on priorities. However, there is a strong willingness to change their approach and to create stronger links with the significant Nine Elms project.
- Too many officers give the impression that the actions required following the Ofsted inadequate are an 'easy fix' and are regarding the imminent Notice of Concern for poor apprenticeship success rates as inconsequential
- The failure is seen to have been around a lack of central record keeping for Safeguarding and consequently the other areas highlighted for improvement are largely dismissed
- The PIAP is underdeveloped. There is no RAG rating and no attempts are being made for its review and monitoring beyond the author of the plan. The review periods are not sufficiently timely.
- There has been a 'flurry' of recent activity but the interconnections between actions and the responsibilities for the Borough as opposed to the providers are not yet clear.
- The individual accountabilities within the Lifelong service team are still changing and many members of staff have competing priorities. The team remains reliant on temporary staff and permanent staff regularly moving their roles.
- There is no transparency in the allocation of funding and the monies retained for Borough overheads. The large sub-contractors are using their allocation of funds as a 'grant' towards a predetermined number of participating learners. There are no penalties for poor quality outcomes.
- Apprenticeship sub-contractors have been identified through a third party. Some of these sub-contractors are operating well outside of Wandsworth priority areas, some

as far as the Midlands. The apprenticeship success rates for 13/14 have been lowest in these out of London areas.

- Growth has been more important than localism, resulting in an over dependence on distance sub-contracting which has proved difficult to monitor and control leading to declining overall and timely success rates over the last three years.
- This focus on growth, coupled with some staff turnover has resulted in previously effective controls over ACL provision being applied inconsistently.
- The absence of effective governance arrangements has meant these changes have gone undetected until the recent Ofsted inspection.
- The senior leadership of the Council now have an opportunity to build on the highly inclusive ACL provision to improve its quality, and relevance for the Council's ambitions regarding employment opportunities for those in the areas of highest deprivation.
- Similarly, the Apprenticeship provision should be more locally focussed to improve linkages with the Council's economic priorities and the Council should formally consider the use of sub-contracting to confirm that this is their preferred delivery method, and that they are able to exercise control over the quality of provision.

Recommendations from Further Education Commissioner

- The linkage between the Local Authority priorities for skills and employment and the curriculum planning for adult community learning and apprenticeships needs to be significantly strengthened
- The Local Authority needs to review the strategic decision to accelerate apprenticeship growth through sub-contractors operating outside of London
- The arrangements for the performance management of the service, sub-contractors and service managers need urgent improvement. This could be achieved by developing and reporting on KPIs, beyond participation, including retention, success and progression across all areas of the service
- The Post inspection Action Plan needs further development to increase the pace of improvement and to provide clear evidence of review, intervention and follow-up actions, with a priority emphasis on apprenticeship success rates
- There is an urgent need to clarify the roles and responsibilities within the Lifelong Learning team, including the Head of Service, which has been subject to significant change during the past year and is still not stable
- In order to improve scrutiny, the Local Authority needs to identify an appropriate forum for the objective and independent monitoring and evaluation of the service provision, including timely implementation of the PIAP.
- Working with the Skills Funding Agency, the FE Commissioner should follow up within 3 months to review progress.

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