

## Education Data Division - Request for Change Form for CBDS

<b>Section 1 - Details of Change</b> <b>(To be completed by the RFC Originator / CBDS Administrator)</b>		
<b>Project / Service:</b>  <b>CBDS</b>	<b>Type of Change:</b>  Addition of three new data items	<b>RFC624</b>
<b>Name and team/company of RFC Originator:</b>  Ann Hughes, Operational Data and MI, EFA		
<b>Originator Contact No:</b> 02476 660304	<b>Originator email address:</b> Ann.hughes@education.gsi.gov.uk	
<b>Date RFC Raised:</b>  24/05/2013	<b>Date change required:</b>  In systems for the start of the 2014 autumn term and for collection in the 2014 Autumn School Census	
<b>Priority:</b>  1	1 = <b>Top</b> - Ministerial or legislative requirement 2 = <b>High</b> - Senior official customer requirement or clear net benefit / efficiency saving to EDD, department or MIS suppliers 3 = <b>Medium</b> - Customer requirement, marginal net benefit 4 = <b>Low</b> - Nice to have, net cost, does not affect functionality, cosmetic change	
<b>DSD Contact:</b> Alison Hamilton, DDU, EDD		
<b>Change Title:</b> New data items to identify post-16 pupils who are in full-time employment		
<b>Data item / Rule Number:</b> New CBDS data items – data item sequential numbers and identifiers to be confirmed if the RFC is approved.		

**Description of change:**

Under Raising the Participation Age (RPA) young people must be in full-time education/training unless they are in full-time employment (20 hours or more per week). We therefore wish to introduce a new data item to indicate those pupils who are in full-time employment and are therefore eligible for part-time education/training. Although we do not require start and end dates for this flag, which will be collected termly, schools may find them useful and software suppliers may therefore wish to include them in systems. It is therefore suggested that CBDS should include FT employment start date and FT employment end date as well as the indicator itself.

*Metadata Requirements:*

Sequential Number – TBC  
CBDS Level - Pupil  
CBDS Module – Pupil characteristics  
Identifier 1 - TBC  
Identifier 2 – n/a  
Data Item Name – Full-time employment indicator  
Description – Pupil who is in full-time employment (20 hours or more per week)  
Type and format – A(5)  
Code set / Valid values – 1, 0, true or false  
Item Level Validation – None  
XML Tag – <FTEmp>  
Status - Active  
History Notes – H  
Multiplicity Notes – S (Single occurrence)

Sequential Number – TBC  
CBDS Level – Pupil  
CBDS Module – Pupil characteristics  
Identifier 1 – TBC  
Identifier 2 – n/a  
Data Item Name – Full-time employment start date  
Description - The date full-time employment commenced  
Type and format - A(10)  
Code set / Valid values - CCYY-MM-DD  
XML Tag – <FTEmpStart>  
Status - Active  
History Notes – H  
Multiplicity Notes – S (Single occurrence)

Sequential Number – TBC  
CBDS Level – Pupil  
CBDS Module – Pupil characteristics  
Identifier 1 – TBC  
Identifier 2 – n/a  
Data Item Name – Full-time employment end date  
Description - The date full-time employment ended  
Type and format - A(10)  
Code set / Valid values - CCYY-MM-DD  
XML Tag – <FTEmpEnd>  
Status - Active  
History Notes – H  
Multiplicity Notes – S (Single occurrence)

### Reason for change (including benefits):

RPA requires that young people age 16 must stay in learning to the end of the academic year that they are 17, and from 2015 that 17 year olds stay in learning up to their 18<sup>th</sup> birthday, and to meet the requirement of RPA full time pupils must be engaged for 540 hours. Pupils can be studying part time only if they are in full time employment. Although we anticipate that there will be few part-time pupils in schools, we need to identify both the hours the young person is doing to ensure that the correct funding is allocated to the institution, and their employment status, to ensure that their programme is eligible for funding. Once fully operational, only pupils who are in full-time employment will be funded on programmes of less than 540 hours.

The Education and Skills Act 2008 set out that from 2015 all 16 and 17 year-olds will be required to participate in education or training. This change is happening in two phases: from summer 2013, all young people will be required to participate in education or training until the end of the academic year in which they turn 17. From summer 2015, this will rise to their 18th birthday. In December 2011 we set out, in *Building Engagement, Building Futures*, our plans to implement this change, together with additional funding through the Youth Contract to support the most disengaged 16 and 17 year-olds back into learning.

Underpinning the overarching duties, there needs to be some very limited regulation so that people are clear about how the law should be applied in practice. This 12 week consultation covered: the definition of residency, the definition of full-time education, ways of working, and the size of possible fines against employers. The findings were used to inform the development of concise statutory guidance for local authorities and focused secondary legislation.

The consultation covered a wide range of areas and responses were finely balanced in a few of those. Where needed, we have had further discussions with relevant organisations to clarify the position and discuss options. We are keen to continue to engage key partners as we develop requirements. In particular, we will explore further with the Department for Work and Pensions how the requirements for education and volunteering align with benefits conditionality. We will work with a group of voluntary and community sector organisations to develop a set of principles for 'reengagement' provision and we will involve local authorities as we prepare the statutory guidance that will support RPA implementation.

Most of the findings were clear, and in accordance with the majority view we will:

- not regulate to define residency in relation to RPA; and
- clarify that self-employment, volunteering and holding an office could combine with part-time study to meet the duty to participate.

In some areas, the responses were more finely balanced, and so we have had further discussions with relevant organisations to clarify the position and discuss options.

On the definition of full-time education for RPA:

- we will set a legal RPA minimum of 540 hours for EFA funded provision (to fit with the recent announcements that all students will be funded at a rate equivalent to 600 hours, with leeway either side for individual cases); and
- we will work with voluntary and community sector partners to provide an alternative definition for 're-engagement' provision based on principles of good practice, rather than an hourly rate.

16- and 17-year-olds who do work full-time will still be under the duty to undertake education or training part-time alongside their work. We are sure that employers will see the benefits of training for their young employees – both for the individual and the business – and training for this age group is all fully-funded by Government.

We will work further with employers' organisations and local authorities to make sure that this is clearly communicated; and that employers have the information they need to understand the benefits of training for their young staff without the need for regulation.

These duties will remain on the statute book and we will keep this under review, with the option to introduce the employers' duties and enforcement in future, if these were needed.

Employment status is collected in the Individualised Learner Record (ILR). One of the codes within this ILR field relates to full-time employment of EFA funded students. There are additional options which are not required in CBDS as they are only required for SFA funded students. The Star Chamber Scrutiny Board (SCSB) has approved the termly collection of the full-time employment indicator for pupils aged 16 and over via the School Census, starting in Autumn 2014.

**Impact of not doing the change:**

Without this change neither schools, Local Authorities, nor the Education Funding Agency (EFA), will be able to monitor progress towards compliance with RPA. Nor will it be possible to enforce RPA, as EFA will not be able to identify ineligible pupils for part time programmes.

**ISB view of the proposed change:**

The proposed change meets the current policy as set out.  
We support the encouragement to also hold start and end dates.  
The proposal would be better future-proofed (e.g. against change to the 540hr threshold) if instead of a flag the number of employed hours were collected, either annual or weekly hours.

**Funding availability:**

Not applicable

**Impact assessment to be undertaken by:**

Core software suppliers  
School Census software suppliers  
School Census Working Group

**Date consulted:**

31 May 2013

**Response requested by:**

7 June 2013

**Section 2 - Impact Analysis  
(To be completed by Impact Assessors)**

**Software Suppliers' Summary of Impact Assessment:**

**Supplier No 1**

I have a number of issues with this RFC:

- I don't think that the date fields should be included in the CBDS as they are not data that a school is going to be the provider of and how will a school know that the data it is holding is accurate?
- The RFC should specify what year groups or ages the indicator is applicable to
- The school is going to have to rely on asking the student how many hours a week they are employed for and what happens if the number of hours changes?
- The RFC says that this flag will be collected termly but Post 16 data is only currently collected in the Oct census so where will this be located in the xml structure?
- If this is collected termly there will need to be clearly defined dates as to when the value of the status should be considered

**Supplier No 2**

We have not had sufficient time to review this proposal thoroughly, but have the following comments/concerns:

- There will need to be a clear definition of how start and end dates are to be used when they are used – in particular:
  - In general, how will the system cope with flexible working patterns – e.g. what will be the position if a student works <20 hours some weeks and more in others – will the school need to record start and end dates in these cases.
  - It is likely that schools will not know end dates for students who continue working after they leave.
  - It may be difficult for schools to establish a specific employment start date when employment started before the student joined the school.
  - There will need to be some clarification as to the strength of evidence that a school is expected to gather to support any identification of the student's employment status and monitor ongoing employment status, again this could be a burdensome area particularly if ongoing monitoring is needed.
- If start and end dates are not required in termly returns:
  - There will need to be clarification as to what the flags mean/how the flags should be used in this context. For example if a student (say) works 20 hours a week in the week of the census should the flag be returned as 'true'? What happens in cases where a student is in full employment throughout the previous summer holiday and only stops the week before the Census.
  - Again what happens for students with flexible working patterns? Or in cases where a workplace holiday week coincides with a school week?

**Supplier No 3**

I have no comments to make on the RFC.

**DfE Internal Colleagues' Summary of Impact Assessment:**

**Alternative Solutions / Workarounds (if appropriate):**

**Estimated Cost of Change:**

**Impact Assessed by (name):**

**Date:**

**Section 3 - Outcome / Decision  
(To be completed CBDS Administrator)**

**Review Meeting:** Data Standards Board Meeting

**Attendees:**

Ian Casey, Gill Turner, Alison Hamilton

**Date of Review Meeting:**

11 June 2013

**Brief Summary of Discussion:**

Comments were received from three software suppliers and ISB in response to this RFC.

In response to the comment from ISB that instead of a flag, the number of employed hours should be collected which would future proof the data item, SCSB felt that counting the number of hours would be a considerable burden for schools and so only approved the introduction of a flag.

In response to the comment from supplier No 1, regarding inclusion of date fields, it is not mandatory to include the date. However, if schools have the data they may populate the date field if they so wish.

In response to the question on whether the school is going to have to rely on asking the student how many hours a week they are employed for and what happens if the number of hours changes, this is a question to be addressed in the specification and is not relevant to the CBDS. However that said, the norm would be that students will be on full-time courses, and this field is only required for part-time students. It therefore seems reasonable that if a student wants to do a part-time course they should be able to prove they are eligible. If the change in hours pushes the student into/out of the full-time employment category then the flag should be changed as potentially the student would need to be moved to a full-time study programme.

The Board advises that the SCSB approval of the business case was for this flag to be collected annually, not termly as previously stated. This data item will be located in the Pupil Characteristics module in the xml structure and further details will be included in the specification. In response to when the value of the status should be considered and whether this will be at census date is something which will also be considered in the specification.

In response to the comments from supplier No 2, these are again in relation to the specification and not relevant for the CBDS. These comments will therefore be considered as part of the 2014 Autumn School Census specification.

The Board has decided to accept this RFC.

**Accept / Reject:**

Accept

**Deferred to:**

Not Applicable

**Type of Funding:**

Not Applicable

**Fund Holder Agreement:**

Not Applicable

**If Defer, provide details**

Not Applicable

**If Accept, provide details:**

**The CBDS will be updated with the following metadata requirements:**

1. Full-time employment indicator

Sequential Number – 1492

CBDS Level - Pupil

CBDS Module – Pupil Characteristics

Identifier 1 - 100521

Identifier 2 – n/a

Data Item Name – Full-time employment indicator

Description – Pupil who is in full-time employment (20 hours or more per week)

Type and format – A(5)

Code set / Valid values – 1, 0, true or false

Item Level Validation – None

XML Tag – <FTEmp>

Status - Active

History Notes – H

Multiplicity Notes – S

2. Full-time employment start date

Sequential Number – 1493

CBDS Level – Pupil

CBDS Module – Pupil Characteristics

Identifier 1 – 100522

Identifier 2 – n/a

Data Item Name – Full-time employment start date

Description - The date full-time employment commenced

Type and format - A(10)

Code set / Valid values - CCYY-MM-DD

XML Tag – <FTEmpStart>

Status - Active

History Notes – H

Multiplicity Notes – S

3. Full-time employment end date

Sequential Number – 1494

CBDS Level – Pupil

CBDS Module – Pupil Characteristics

Identifier 1 – 100523

Identifier 2 – n/a

Data Item Name – Full-time employment end date

Description - The date full-time employment ended

Type and format - A(10)

Code set / Valid values - CCYY-MM-DD

XML Tag – <FTEmpEnd>

Status - Active

History Notes – H

Multiplicity Notes – S

The CBDS, version control log and RFC log [Common Basic Data Set \(CBDS\) database - Data, research and statistics](#) will be published by week ending 28 June to reflect this change.

**If Reject, provide details:**

Not Applicable