Skills for Jobs: A New Further Education Funding and Accountability System

Government consultation response

July 2022

Contents

Introduction

On 15 July 2021 we launched the consultation 'Skills for Jobs: A New Further Education Funding and Accountability System'.[1]

The consultation contained proposals for delivering the government's vision for Further Education (FE) funding and accountability reform, set out in the 'Skills for Jobs' White Paper published in January 2021.[2] The consultation was split into two chapters covering funding and accountability respectively. The consultation closed on 7 October 2021.

Our consultation proposed reforms to the adult skills funding system, with the aim of making it simpler and more effective in enabling colleges to focus on their core role of education and training.

We sought views on:

- establishing a new Skills Fund to bring together all direct funding for adult skills ensuring that the system can support both qualification-based provision and non-qualification provision, so that adults can retrain and upskill in the most effective way

- introducing a needs-based approach to distribute funding across England

- distributing funding most effectively between colleges in Education and Skills Funding Agency (ESFA) funded areas, particularly seeking views on what a simpler formula might look like if a system based on funding learners is retained; moving to a lagged funding system, and delivering a multi-year funding regime

- applying entitlements and eligibility in a new system

- managing Independent Training Providers (ITPs) and other non-grant funded providers within a reformed system

We also proposed to reform the accountability system to focus on outcomes, in particular in relation to meeting local and national skills needs; and to take a more strategic approach to support and intervention.

We sought views on:

- specifying the outcomes that we expect colleges to deliver, through a new Performance Dashboard

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[1] The 2021 Funding and Accountability consultation document is available at https://consult.education.gov.uk/fe-funding/reforms-to-funding-and-accountability/user_uploads/skills-for-jobs-a-new-further-education-funding-and-accountability-system-1.pdf

[2] 'Skills for Jobs: Lifelong Learning for Opportunity and Growth' is available at: http://www.gov.uk/government/publications/skills-for-jobs-lifelong-learning-for-opportunity-and-growth

- the introduction of a new skills measure that will capture how well a college is delivering local and national skills needs

- the introduction of a new Accountability Agreement that will reinforce colleges' autonomy while providing a clear sense of mission

- exploring an enhanced role for Ofsted to inspect how well a college is delivering local and national skills needs

- enabling the FE Commissioner to enhance its existing leadership role, with a renewed focus on driving improvement and championing excellence

- improving data quality and reducing the requirements that we place on providers through student data collection and financial reporting

- retaining the necessary regulation and oversight to ensure the effective operation of the market, including providing assurance on use of public funds

We received 142 unique responses to the consultation. Of these:

- 51 were from local authorities

- 38 were from further education providers[3]

- 21 were from representative bodies

- 17 were from respondents listed as 'other'

- 14 were from independent training providers

- 3 did not declare the nature of their organisation

- 2 were from employers

- 1 was from a learner

A number of respondents indicated that they were responding to the consultation in more than one capacity and so the total above is greater than the 142 unique responses received.

We would like to thank all those who responded to the consultation as set out in Annex A, as well as college leaders and sector experts who have worked with us to co-design our proposals.

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[3] This question asked respondents to note the capacity they were responding in. Whilst providers might fall into multiple categories, for example independent training providers are also further education providers, these responses note how respondents recorded themselves in their response.

How we have used your feedback

In the following chapters we summarise the responses that we received to our first consultation. Where there was a multiple choice question, responses have been summarised and provided in a table. These have been rounded to the nearest percentage point, so might not always add up to 100%. Where the consultation included free text questions or asked for supporting comments in addition to a multiple-choice question, we have summarised the key themes that respondents raised in the relevant section.

The feedback received from the consultation has been considered by the Department for Education (DfE) and has helped to shape the further development of our proposed reforms as set out in more detail in our second consultation, which is available here.

We encourage and welcome all those who work in and with the FE sector to review and contribute to our second consultation, which is open for responses until 12th October 2022.

Question Analysis – Funding Reforms

This section includes a summary of the responses received to questions 1 to 31 from our 'Skills for Jobs: A New Further Education Funding and Accountability System' consultation. Questions are grouped by the broad theme of the proposal that they refer to, to allow responses to be considered alongside each other.

Skills Fund: Objectives

Question 1

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

	Total	Percent
Yes	69	54%
No	34	27%
Unsure	24	19%

Question 2

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

Question 2 was separated into three separate questions, allowing respondents to answer specifically on each reform objective:

Simpler and more streamlined	Total	Percent
Yes	109	91%
No	2	2%
Unsure	9	8%

Outcome-focussed	Total	Percent
Yes	56	47%
No	37	31%
Unsure	26	22%

Effective	Total	Percent
Yes	109	92%
No	1	1%
Unsure	9	8%

Summary of responses to questions 1 - 2

Respondents generally agreed with the objectives as set out, and that adult education and skills funding should be simpler and allow for a wider set of provision to be funded. Many remarked that the core of the present system is not complicated, but that the add-ons and various funding streams have made it complicated.

A significant number of respondents did not agree that Community Learning should be included as part of these reforms and expressed concern that we would lose sight of the positive impact of this provision on communities as a result. Some respondents expressed concern that the focus on higher levels of provision would lead to displacement of provision at lower levels which are crucial in enabling learner progression.

Skills Fund: Purpose

Question 3

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

There were 115 responses to this question, which was a free-text question.

Question 4

How can we ensure this provision is high quality?

There were 113 responses to this question, which was a free-text question.

Question 5

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

Summary of responses to questions 3 - 5

Respondents agreed that non-qualification provision plays a vital role in supporting returners to learning and want to see the current approach continue, particularly for the provision currently delivered through Community Learning.

In response to how non-qualification-based provision could most effectively be funded in the future, a number of respondents supported an approach based on a Guided Learning Hours (GLH) model. Others recommended a needs-based approach, and some thought it should be co-funded. Many suggested that funding for non-qualification provision should be based on a reasonable percentage of a provider's total spend, with local partners then determining how it is used. Some respondents suggested that the Community Learning funding stream should be increased and expanded as, in their view, it is already simple and effective.

In response to how we can ensure non-qualification provision is of high quality, many respondents supported the continued use of the Recognising and Recording Progress and Achievement (RARPA) cycle. Others recommended that the Ofsted inspections framework is used to determine quality. A number of respondents remarked that if provided with clear, simple, uncomplicated criteria related to how learning should be delivered and assessed, providers and employers can be trusted to use this funding appropriately.

We asked for your ideas on how we could fund providers for innovative provision that is not currently funded by the system. Most respondents agreed that this sort of flexible funding should be part of any new system, providing local employers and providers with flexibility to co-design non-qualification-based provision that supports business growth, productivity, and in-work progression for employees. Some respondents questioned whether state funding should be used to fund employer-led innovative provision, suggesting that employers should meet the cost of their skills needs from their own resources.

Respondents were generally supportive of a discrete innovation funding pot that providers could access to develop and fund this type of provision. There was general agreement that the method should be simple, flexible and with little bureaucracy. Some respondents favoured a very simple application process, while others preferred the allocation of a percentage of Skills Fund specifically for research, development, and innovation, or for testing of new ideas and approaches. Several respondents suggested that funding for the purpose of innovation should be part of an embedded growth system, rather than top sliced.

A number of respondents remarked that innovation often requires providers to take on some risk and to invest where there may be failure, and therefore the system would need to allow for failure and provide investment funds up-front.

Skills Fund: Design

Question 6

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?

	Total	Percent
Yes	56	44%
No	43	34%
Unsure	27	21%

Question 7

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 were 115 responses to this question, which was a free-text question.

Summary of responses to questions 6 - 7

Respondents who agreed with the proposal to bring together all adult skills funding into a single Skills Fund felt that this would ensure effective and efficient use of the funding and provide a mechanism to reduce complexity within the system. Some wanted to see the government go further by including Skills Bootcamps and the UK Shared Prosperity Fund (UKSPF).

Those who did not agree raised concerns about implications for the future of Community Learning, noting the risk of losing dedicated funding for this provision at a time when no other community fund is available until there is a replacement for the European Social Fund (ESF). Some respondents suggested that Community Learning funding be reviewed separately.

Some respondents felt unable to give a view without further detail as to how it would work in practice, and assurance that there would be no negative impact on funding levels, particularly for priority groups.

In terms of general reflections, several respondents felt that by not including 16- to 19 funding, apprenticeship funding, Higher Education (HE), and funding through Mayoral Combined Authorities (MCAs), the benefits of these reforms in terms of overall

simplification would be limited. Others commented that what was proposed represented only a partial answer to the issue of complexity and felt that it would quickly lose relevance with the expansion of devolution.

Funding for devolved learners

Question 8

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

	Total	Percent
Yes	44	40%
No	4	4%
Unsure	63	57%

Respondents who agreed with funding through a needs-based assessment believed that this could result in a fairer funding system. There was general agreement that it should be introduced with 'levelling-up' policy in mind, and not adversely affect disadvantaged areas. Some respondents believed that it should be introduced in a way that protected against potentially large reductions in some areas.

Few respondents disagreed, but a majority of respondents were unsure. The respondents that were unsure generally agreed in principle with a needs-based formula but wanted to see what this would look like in practice and were concerned about a change in the system if it meant taking funding away from disadvantaged areas.

Question 9

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

Question 9 was separated into seven separate questions allowing respondents to answer specifically on each of the elements:

Demographic	Total	Percent
Yes	101	96%
No	1	1%
Unsure	3	3%

Educational	Total	Percent
Yes	101	96%
No	0	0
Unsure	4	4%

Economic	Total	Percent
Yes	99	94%
No	1	1%
Unsure	5	5%

Disadvantage	Total	Percent
Yes	99	94%
No	1	1%
Unsure	5	5%

Rurality	Total	Percent
Yes	92	90%
No	2	2%
Unsure	8	8%

Cost of Provision	Total	Percent
Yes	85	83%
No	10	10%
Unsure	8	8%

Transitional Protection	Total	Percent
Yes	84	82%
No	6	6%
Unsure	12	12%

A number of elements that could help build this formula were proposed: demographic / educational / economic / disadvantage / rurality / cost of provision / transitional protection. Most respondents agreed that each of the proposed elements were important, though to slightly different extents. Some respondents mentioned that the specifics were important, for example, any weighting between such elements, and the overall pot of funding available.

Funding for learners in ESFA funded areas

Question 10

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?

There were 100 responses to this question, which was a free-text question.

Question 11

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?

Question 11 was separated into four questions allowing respondents to answer on each of the potential elements:

Unit of activity	Total	Percent
Yes	52	53%
No	9	9%
Unsure	38	38%

Simple funding rates	Total	Percent
Yes	61	62%
No	7	7%
Unsure	31	31%

Addiitional needs uplift	Total	Percent
Yes	66	67%
No	4	4%
Unsure	29	29%

Area costs	Total	Percent
Yes	57	58%
No	7	7%
Unsure	34	35%

Question 12

Do you agree that we should use the same needs-based formula between all areas of England? How should we balance responsiveness to activity delivered and equal opportunity to access training?

	Total	Percent
Yes	35	35%
No	15	15%
Unsure	51	50%

Question 13

How can we introduce these changes most effectively?

There were 93 responses to this question, which was a free-text question.

Summary of responses to questions 10 - 13

There was broad agreement from respondents that an activity-based system was the best option. Some respondents were concerned about the potential for income volatility, which can make it more challenging to do certain things, for example, employing teachers on permanent contracts. However, respondents generally preferred it to other models. Some respondents suggested alternatives, but there was a general sense in the responses that whilst an activity-based model was the best option, there were pros and cons to all of the options.

We set out the elements that could make up this system: funding rates based on unit of activity / simple funding rates / additional needs uplift / area costs - and asked for views on each. There was a large amount of support for inclusion of these elements, but also a call for more detail. In particular, there were questions about how Community Learning learners would be accommodated in this funding formula.

We asked whether the same needs-based formula should be used between all areas of England, and how we should balance responsiveness to activity delivered and equal opportunity to access training. Many respondents emphasised the need for fairness in the way that funding is distributed to devolved and ESFA funded areas. A number of respondents wanted more detail on the formula. Several highlighted the importance of ensuring that the right elements were considered in order for a needs-based formula to work effectively, given variations between and within regions.

Respondents suggested a number of ways in which we might introduce changes most effectively. Some of the more common themes raised by respondents included the need for open communication with the sector, and an impact assessment. Some respondents wanted DfE to take a direct and comprehensive approach in engaging and getting feedback from the sector on any changes.

There were also a number of responses that brought out the importance of finances in helping any changes work effectively. In particular, respondents suggested increased investment, and transitional protections for those areas that would be more affected by the changes.

Simplifying funding through a single additional needs element

Question 14

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

	Total	Percent
Yes	82	70%
No	15	13%
Unsure	20	17%

Question 15

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

There were 96 responses to this question, which was a free-text question.

Question 16

Is there a different approach we should explore?

There were 77 responses to this question, which was a free-text question.

Question 17

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

There were 99 responses to this question, which was a free-text question.

Question 18

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

There were 92 responses to this question, which was a free-text question.

Summary of responses to questions 14 - 18

The majority of respondents agreed with the proposal to bring together funding for disadvantage, learning and learner support through a single additional needs element as part of a new funding formula. However, many commented that their support was conditional on the overall level of funding for disadvantage and additional needs being increased, and an assurance that consolidation would not lead to a reduction in support for those most in need. Of those who disagreed with the proposal, a number were concerned that merging this funding into a single pot risked learners with additional needs being inadvertently disadvantaged and that it could take away the flexibility providers currently have in terms of meeting learner needs. There was strong support for this flexibility to be retained.

Of those who offered a view on whether the proposed approach would have unintended consequences, many highlighted the risk that this proposal could lead to a reduction in support for those most in need - suggesting that this is what happened with the introduction of study programmes in 16- to 19 provision. Respondents also suggested that because each funding stream reflects a different type of need, bringing them together might not meet the need for which they were intended, especially if the level of funding is not increased. Others thought it might lead to a focus on in-class support at the expense of support for learners to get to class in the first place, for example support with costs for childcare or travel.

Some respondents expressed concern that this might lead to variability amongst providers in terms of how support for learners is prioritised. For example, they felt there

would be a risk, with an increased focus on employment outcomes, that some individual support needs might not be met. This might especially be the case for those with difficult to meet needs, if providers focus on those whose needs cost less per capita to maximise numbers and outcomes.

Many respondents supported DfE's suggestion that providers should be required to prepare and publish a policy explaining how they use this funding. However, they felt that this must be supported by changes in other parts of the system. Examples included ensuring that designated Employer Representative Bodies (ERBs) also have appropriate obligations to consider the additional needs of learners; and that performance reporting systems, including the proposed FE Performance Dashboard, do not penalise this sort of activity.

On the question of whether there is a different approach that we should explore, some respondents suggested that the current approach should be retained, but that more be done to better understand the level of demand and ensure that this funding is used effectively to support learners to access education. Other suggestions included:

- adopting an approach similar to the Education Health and Care Plan (EHCP) for the most disadvantaged learners, to identify specific costed support that the individual needs, with the provider funded to deliver the learning and support specified

- distributing the Skills Fund through a needs-based or activity-based formula, so that funding for disadvantage / learning and learner support could be incorporated into the overall fund rather than treated separately

- exploring better data sharing between providers, National Health Service (NHS) and Department for Work and Pensions (DWP) to establish a system of automatic eligibility. For example in declaring a disability or illness, a learner would automatically receive an entitlement to free adult education and related support

The majority of respondents agreed with the factors proposed to be included in a measure for additional needs but suggested that other factors could be added. Examples included those who are socially isolated, those in poverty, those with health issues that impact on learning (mental health, anxiety, addictions issues), learners with caring responsibilities, troubled families, and those living on low incomes. It was also suggested that additional support needed by specific groups including care leavers, English for Speakers of Other Languages (ESOL) learners, refugees and asylum seekers should be reflected in these measures.

A number of respondents commented on the challenge of measuring these factors in a fair and effective way. It was suggested, for example, that measuring disadvantage just by postcode is ineffective in London – and that it would require a more sophisticated assessment of need.

Most respondents agreed that the proposed approach would help to reduce the administrative burden on providers and enable them to support their learners better. They recognised the benefits of simplifying the system, especially if audit requirements were also less onerous. Some agreed that it would enable them to plan more effectively and with greater flexibility to meet the needs of their adult learners. However, there were also suggestions that providers would need time and a guarantee of funding to make the necessary adjustments. Others commented that implementation would need to be carefully handled and monitored to ensure that vulnerable learners were not adversely impacted by the change.

Of those not in favour, some felt that the evidence requirements were simply being moved elsewhere, for example to the proposed Accountability Agreements and Performance Dashboard, rather than being reduced. Some felt that the impact would be of limited benefit because the proposal would not impact MCAs. Others questioned how the new approach would interact with other funding streams, for example from the MCAs/GLA or other government programmes, and suggested that having different approaches to funding and reporting in different parts of the system would be particularly challenging for national providers.

Funding on lagged learner numbers

Question 19

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

	Total	Percent
Lagged system	38	34%
Allocation and reconciliation	26	23%
Unsure	48	43%

Question 20

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

There were 81 responses to this question, which was a free-text question.

Summary of responses to questions 19 - 20

Of those who favoured continuing with the existing 'allocation and reconciliation' approach, many commented that it provided consistency and stability, and that a lagged

approach would simply add complexity and uncertainty. They explained that because adult learning patterns are less predictable and more volatile than 16-19, a lagged approach would not be suitable. Providers need to be flexible and responsive in-year which a lagged approach would not support. There was also some concern about the financial implications of a move to a lagged approach, and suggestions that the current approach could be refined. For example, tolerance levels could be based on the proportion of provision in priority sectors or learner characteristics, rather than on actual earnings as they are now.

Respondents who favoured a lagged approach felt that it would provide certainty and support better planning, especially as it would remove the risk of clawbacks at the end of the year. Respondents also suggested that this approach would allow time for providers to adjust if demand fell, as it helps smooth out fluctuations in learner numbers over financial years without penalising the provider for unexpected dips.

While some respondents felt that a lagged approach rewarded growth, others thought that it worked less well when there is growth in learner numbers. There were suggestions that DfE would need to put in place ways to support exceptional growth in learner numbers. Some respondents were concerned that the implications of a lagged approach for individual providers would depend on their size and that it could penalise providers who deliver small provision to lots of learners. It was suggested that a lagged approach would need to be phased in to avoid instability.

A number of respondents were unsure, acknowledging that there were benefits and weaknesses with both systems, and that both can lead to financial pressure on providers. Some felt they did not have enough information on how a lagged approach would work in practice to be able to determine the advantages, particularly for learners.

There were a wide range of responses to our question about whether there was another method, not outlined in the consultation, that would be preferable. Suggestions included:

- adopting the apprenticeship model and using the Individualised Learner Record (ILR) return to determine funding each month

- giving providers a range within which they should aim to deliver without future funding being cut, or in-year funding not being available

- allocating funding based on a plan via a formula to a local body who then allocate to providers on a three year rolling basis based on their contribution to the plan

- moving from a targets-driven model to an outcome-based framework, to enable greater innovation and aid trialling and testing of new interventions

- adopting a three-year-plan-led approach for providers with funding allocated on a local needs-based assessment. It was also suggested that a needs-based funding approach would empower colleges to respond to the needs of the economy,

employers and their communities and that this would be preferable to the current system that they described as 'hit the target – miss the point'

- introducing individual learner funding or personal learning accounts

Some respondents felt they needed to see some modelling of the existing proposals before responding to this question.

Upfront funding for growth areas

Question 21

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

	Total	Percent
Yes	103	87%
No	4	3%
Unsure	11	9%

Question 22

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

There were 92 responses to this question, which was a free-text question.

Summary of responses to questions 21 - 22

A large majority of respondents agreed with our proposal for a mechanism within the Skills Fund to provide upfront funding for specific growth areas. Respondents agreed that there was a clear need to invest in delivering growth and supported an approach that moved away from one-off tendering or procurement which they considered to be costly, short-term and bureaucratic. Respondents also felt that an upfront mechanism would be a faster, cheaper and a more reliable way of distributing additional funds than one-off procurements. Many welcomed the reassurance that this approach would give to providers when incurring upfront costs and managing commercial risks associated with establishing new provision and resources.

Respondents also commented on the importance of having a robust and transparent process for determining priority and growth areas, given the variation in local economies and contexts. There were also suggestions that accountability, audit, and data systems

for the overall Skills Fund should be applied to this funding rather than inventing a separate approach.

Some respondents wanted further clarification on how this proposal would be delivered in devolved areas, remarking that local areas are best placed to understand their local economies, identify local priorities and engage with local businesses, industries and providers. Other respondents felt that funding for priority growth areas should be devolved to MCAs, and that MCAs should be given greater freedom and flexibility to determine how best to achieve national priorities.

Respondents who disagreed with the proposal expressed concern that it could create further ring-fencing and bureaucracy, and add to the complexity of the system rather than simplify it. Many felt that moving to a plan-based model with clear principles and a clear statement of government strategy and policy would mean that providers and employers would be better placed to develop new provision on a shared risk basis, thus removing the need for this type of approach.

Suggestions for other mechanisms that we could explore to support growth in specific areas included:

- higher funding rates for priority courses/sector subject areas i.e. a form of programme weighting

- a broader use of the apprenticeships levy for employers needing this investment

- local tax advantages for employers who support these programmes e.g. reduced National Insurance (NI) contributions

- pilots which trial new funding models and suites of training

- using Accountability Agreements to set out expected outputs and outcomes which relate specifically to supporting growth in specific skills areasan agreed percentage of the provider's funding to go towards new and growth provision, with a business case process for further growth

- follow a similar approach to the growth plan funding model for new schools

Respondents agreed that whatever the mechanism, effective forward planning which allows for sufficient lead-in time is key to ensuring that providers can deliver effectively. A number urged caution around any mechanism that requires resource-intensive competitive processes, as these take up a large amount of resource and time to do well, encourage competition over collaboration, and risk duplication and displacement of existing activity. It was noted that MCAs are already using their devolved powers to test and trial a variety of mechanisms in this space, including funding flexibilities, and suggested that DfE could learn from these approaches.

Multi-year funding

Question 23

We welcome views on our proposed multi-year approach, including how this might affect colleges' behaviour.

There were 113 responses to this question, which was a free-text question.

Question 24

How else could the funding system be improved to make strategic planning and year to year managing of funding and expenditure easier for providers?

There were 100 responses to this question, which was a free-text question.

Summary of responses to questions 23 - 24

Most respondents welcomed the proposed multi-year approach, recognising it as a helpful step towards providing more predictability and allowing providers to take risks in adapting to changing employment needs. Most respondents agreed that it would bring more certainty and stability, enable providers to plan strategically to meet local needs, and help providers to develop provision in a controlled way.

Respondents also highlighted what they perceived to be challenges with a multi-year approach. For example, how to handle in-year growth; the need for appropriate measures to protect against abuse of the system without increasing the number of audits; and clarity around what would happen in the event of single year roll-forward Spending Reviews.

Several respondents asked whether a multi-year approach would apply to all providers and not just colleges. Some training providers commented that they would welcome contracts of more than one year to enable better planning and delivery. A number of respondents gave the proposal a cautious welcome but wanted further clarification on how a multi-year approach might work in practice.

A smaller number did not support the proposal, with some suggesting that it was a bad idea as providers already have a high degree of certainty.

Respondents also suggested other ways to improve the funding system to make strategic planning and year-to-year management of funding and expenditure easier. Suggestions included:

- flexible and responsive funding with a simple, stable model, clear quality outcomes, fewer eligibility rules, more streamlined data collection, and a reduction in audit requirements

- fewer in-year or short-term changes as this can inhibit good planning and responsiveness

- early notification of changes to funding rates and to qualifications eligible for funding, enabling providers to better manage the planning of their provision

- a plan-based approach to funding within a multi-year settlement regime would encourage providers to collaborate more rather than compete, to the benefit of local employers, communities, and individuals

Funding eligibility rules

Question 25

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

There were 115 responses to this question, which was a free-text question.

Question 26

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?

There were 95 responses to this question, which was a free-text question.

Summary of responses to questions 25 - 26

In relation to which entitlements and eligibility rules should be maintained in the new system, the majority of respondents agreed that the statutory entitlement to free literacy and numeracy and digital courses should remain. Some respondents also suggested reinstating previous entitlements for a full Level 2 and Level 3 for all adults, particularly for qualifications in growth sectors or skills shortage areas. There was strong support for retaining an entitlement to free courses for those who need to retrain, with respondents commenting that adults with older qualifications may face particular challenges and should be supported to compete in the changing labour market. Respondents also supported the retention of an entitlement linked to ability to pay.

Respondents suggested that removing the rules around age and qualification level would make it possible to simplify funding rules and allow colleges to support older adults

seeking to retrain in different sectors, noting that the majority of adults participating in skills training are doing so to acquire new skills for a purpose, usually connected to employment. These respondents acknowledged the financial risks attached to opening up eligibility more widely but suggested the arguments for doing so are strong, particularly given the changing economy and need to train and re-train multiple times over our lives and careers. Many respondents felt that current entitlements and eligibility rules do not reflect this challenge, noting that "a middle-aged adult with a Level 3 from 20 years ago might be in as much need of a new Level 3 as an 18-year-old." There were additional comments noting that where learners could afford to pay, or were already well qualified, they should pay for their learning.

Some respondents suggested that the government make a clear statement on what it is willing to support. Suggestions included: individuals Not in Education, Employment, or Training (NEET) between 19-23; individuals with poor essential skills in English, ESOL, lip reading and sign language, maths, digital skills; individuals without a vocational Level 2 and 3; and individuals who are unemployed, and non-waged learners.

A number of MCAs provided examples of where they have been able to flex eligibility, including lifting the low pay threshold to the real living wage, and removing the upper age limit for access to Level 3 provision.

We asked how colleges might allocate funds when the available budget is limited, and whether specific additional rules might be needed to constrain activity. Many respondents commented that providers have sufficient knowledge and expertise to be able to allocate their funding effectively according to local need and the quantum available, and have the structures and governance in place to do this effectively.

A number of respondents commented that there was no need for change here as providers already manage their funding in line with local needs and national requirements. Further comments noted that there are already sufficient constraints in the system. They cited the quantum of funding in particular, but also referred to DWP rules on being in education whilst claiming benefits.

Respondents saw a role for the new Local Skills Improvement Plans (LSIPs) in helping to inform the allocation of resources locally and suggested that this should dovetail with the proposed new accountability measures to ensure priority groups of people are supported by the system without the need for further rules.

Respondents felt that it was essential that any changes to the eligibility rules which reduce entitlements are researched, modelled and risk managed to avoid any unintended consequences, especially given the need for adults to retrain and upskill. Respondents also recognised the implications of devolution, noting that MCAs have some autonomy over the eligibility funding rules and retain flexibility to amend those rules in line with their local priorities.

Funding for independent training providers

Question 27

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

There were 94 responses to this question, which was a free-text question.

Question 28

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?

There were 93 responses to this question, which was a free-text question.

Question 29

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

There were 74 responses to this question, which was a free-text question.

Question 30

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

There were 64 responses to this question, which was a free-text question.

Summary of responses to questions 27 - 30

Respondents noted that the government had a role to play in direct procurement of skills provision. For example, where local colleges were not able to meet government procurement needs, either as a result of geographical or resource constraints, if there was a particular time pressure, or a very specific skills pressure. Some respondents felt that the government should undertake a broader role in procuring more skills provision than it does currently.

Many respondents felt that grant-assured providers were the most appropriate commissioner, and that, where possible, DfE should utilise providers as they have considerable experience of commissioning in the sector to procure the skills provision needed. Respondents noted that provision commissioned at a regional or national level was often short-term and does not provide the opportunities for learner progression that

might be achieved through an offer developed at a local level. Some respondents also felt that this risked generating perverse incentives, where larger providers might seek to corner a market or otherwise focus solely on delivering an output rather than an outcome.

In terms of improving the way that government procures provision, many respondents cited the need for DfE to engage closely with colleges and local authorities to ensure proper coverage, and minimise the chance of duplication between procurement undertaken by DfE and anything identified through local plans. It was noted that this engagement should be broad, to support all interested parties to contribute and shape any procurement activity.

Some respondents felt that measures to ensure that only high-quality providers were selected, including approved provider lists or amended procurement frameworks, would be an important step in effective government procurement. Respondents felt that it was important that this process was clear and transparent.

Many respondents identified an issue with procurement rounds that centre on short-term provision. The lack of certainty of funding in future introduces additional risk, making it difficult for some providers to effectively engage. Respondents suggested that longer-term procurement rounds would provide more security and stability for commissioned providers and allow them to focus on delivery.

In terms of how we can support colleges to improve how they commission, many respondents suggested that providers were already effective in this space and well supported by their representative body. It was felt that DfE could support more effective commissioning in future by working with commissioners to understand and disseminate best practice, capitalising on the experience and understanding already developed within the sector. A number of local authority respondents noted that public procurement rules govern their approach and that they felt well placed to work with DfE on better understanding how to achieve this outcome.

Some respondents suggested that reducing rules and requirements around sub-contracting would allow this experience to be more effectively deployed as and when needed by providers.

Many respondents suggested that there needed to be a consideration of a broader perspective, with colleges collaborating effectively to ensure the right provision is on offer for the local area. Ensuring that the provision on offer was appropriate would be more likely to create an effective partnership between the commissioning body and provider.

Most respondents felt that it was important to support arrangements for providers that are commissioned by colleges, and many focussed on the necessity of clear rules to support commissioners and providers. Many respondents felt that the high quality of provision, particularly local authority provision and subcontracting, suggested that robust practices were already in place to support providers. These respondents suggested that DfE could

facilitate sharing of best practice from local authorities, to support a broader range of commissioned providers.

A number of respondents considered that there was a broader question to be answered with regards to supporting colleges to improve commissioning. Some felt that colleges should not be able to subcontract, and others commented that this type of subcontracting should be conducted by a devolved authority or at a national level. Others suggested that where subcontracting had occurred within a devolved authority area, the devolved authority should play a role in ensuring that the provider is supported.

There were also comments noting the importance of a supportive culture aimed at improving commissioning practices rather than penalising errors. There were suggestions that a mechanism for helping commissioners and providers where difficulties had arisen, such as a helpline, might be a useful tool to support commissioned providers. A number of respondents noted that recent changes to subcontracting rules will play a key role in supporting commissioned providers.

Supporting changes in provision

Question 31

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

There were 101 responses to this question, which was a free-text question.

Summary of responses to question 31

There were a wide range of suggestions as to how DfE might best support local areas to expand their offer to better meet current and future skills needs. A number of respondents felt that consistency of vision and key objectives would play a critical part, as would funding certainty, to allow providers to align provision to the vision with assurance that they had the necessary funding to achieve this shift.

Many respondents felt that a system designed around flexibility and collaboration would be able to effectively adapt and expand in this way. Other suggestions included the development of a framework supporting the planning and resourcing of particular subject areas, and the importance of collecting better data to facilitate this shift. Many comments flagged that DfE needed to ensure those best placed to make decisions were able to do so, noting that institutions delivering provision are best placed to decide upon what to offer. There was a recognition of the importance of national data in that process, and the need to collaborate with external partners to ensure that the offer met local need. Many respondents felt that placing trust in institutions would enable us to deliver the necessary shift.

Question analysis – accountability reform

This section includes a summary of the responses received to questions 32 to 49 from the 'Skills for Jobs: A New Further Education Funding and Accountability System' consultation. Questions have been grouped by the broad theme of the proposal that they refer to, to allow responses to be considered alongside each other.

FE Performance Dashboard

Question 32

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?

There were 102 responses to this question, which was a free-text question.

Question 33

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

There were 89 responses to this question, which was a free-text question.

Question 34

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

	Total	Percent
Yes	28	27%
No	60	57%
Unsure	17	16%

Question 35

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

	Total	Percent
Yes	29	29%
No	63	63%
Unsure	8	8%

Summary of responses to questions 32 - 35

Respondents made a range of suggestions for suitable measures to show how well colleges are delivering good outcomes. These included learner-related success measures such as qualification achieved, satisfaction, progression into a job; progression measures such as earnings, employment and promotions; and broader success measures such as improvement in self-esteem and improved community engagement.

Many respondents asked for measures that can be appropriately contextualised, to allow for consideration of a range of factors when assessing performance. If the metrics were over-engineered or required a longer amount of time to come to fruition, some respondents felt that these could be difficult to measure.

In terms of taking under-performance on the Skills Measure into account for planning an Ofsted inspection, those who agreed felt that, provided Ofsted inspectors were given sufficient guidance, this would add value to the Skills Measure and improve the focus on responding to local and national skills needs. Concerns from respondents who disagreed were around composition of the measure, and whether sufficient context could be considered to ensure that it did not unfairly disadvantage some providers.

Those who were unsure noted that the Skills Measure could be a useful additional measure to help providers improve, but suggested that context needed to be taken into account. There were also some questions about how we would interpret what a 'high value' job is, relating to the proposed longer-term aim of measuring this, and a general view that the Skills Measure should only be used in the context of other measures and other Ofsted data.

Respondents who agreed that we should publish colleges' financial health ratings in the Dashboard commented that transparency was important in the use of public funds, and suggested that this might create an increased sense of accountability in providers. Those who disagreed had concerns that publication in a high profile dashboard could negatively impact on learner enrolment and employer engagement, making the financial position worse for colleges with a poor rating; and that as these ratings are not published for HE or other provider types, and colleges are often in competition with these providers, there was a risk of creating an uneven playing field. There were also concerns that the system did not account for specific instances that might impact a provider's financial health

rating, and that there was a risk that inclusion of this rating might detract from the other metrics on the Dashboard. Those who were unsure suggested that it might be valuable but that it needed to be carefully considered.

Accountability Agreements

Question 36

Do you agree with our objectives for new Accountability Agreements?

	Total	Percent
Yes	77	73%
No	13	12%
Unsure	15	14%

Question 37

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

	Total	Percent
Yes	48	49%
No	10	10%
Unsure	39	40%

Question 38

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

There were 88 responses to this question, which was a free-text question.

Summary of responses to questions 36 - 38

The majority of respondents agreed with our objectives for new Accountability Agreements, with many saying that they would help to reset the relationship between key agencies and providers. However, there was a view that if they were to work to their greatest potential, they should be aligned with the approach taken by MCAs and reflect local priorities. Respondents who disagreed with Accountability Agreements were

concerned that they might create additional burdens and detract from the ability of MCAs and others to exert influence and control over the process. Those who were unsure largely noted that without further clarity it was difficult to state, but that there was some merit in a new approach if applied correctly and designed with the sector.

Many respondents felt that Accountability Agreements should replace Funding Agreements to make the process less onerous. However, some respondents suggested that this approach could conflict with current funding agreements between MCAs and providers, and that the Agreements might not be suitably specific to take targeted action to hold a provider to account. Those who were unsure noted that this might represent an opportunity to reduce the burden of existing arrangements, but that more detail was needed, particularly around how they would work within MCA areas.

In terms of shifting college behaviour towards meeting local skills needs, there was a broad view that all of the proposed measures would have an impact on this; and that Including Employer Representative Bodies (ERBs) in the process would ensure that local skills needs were clearly defined and would assist in shifting college behaviours. There was a broad view that, once developed and in use, the Skills Measure could play an important part in Ofsted inspecting how colleges are meeting local skills need and making a broader contribution to their community. Suggestions to support this included engaging with a wider range of stakeholders to encourage broader collaboration over the local offer.

Enhanced Ofsted inspections

Question 39

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

There were 88 responses to this question, which was a free-text question.

Question 40

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

	Total	Percent
Yes	54	59%
No	12	13%
Unsure	25	27%

Summary of responses to questions 39 - 40

A range of suggestions were received on how Ofsted could best make meeting local skills needs a more prominent feature within its inspection framework. These included:

- placing the 'skills' element of Ofsted's inspection within the Leadership and Management section of their inspection framework. There were also some suggestions that, rather than create a separate grade for skills, Ofsted undertake a more detailed inspection of provider involvement in, and contribution to, local and regional economic needs, to inform provider decisions

- engaging with a wider range of stakeholders to understand local skills needs, including making stronger links with devolved authorities and LSIP partners as part of triangulating data and intelligence to reach a judgement about a provider. There were also some calls for deep dives into employer and stakeholder involvement in addressing local skills needs, as well as curriculum intent for adult provision

- developing and communicating a simple set of criteria for expected outcomes, so that providers know what is being judged. This included recognising regional and national priorities and development of transferable skills in future inspections

- consideration of this model for ITPs as well as colleges, so that there is a level playing field on quality and incentives to deliver certain courses

Many respondents made suggestions for changes to Ofsted's inspection approach to support improvement in this aspect of college performance. These included:

- consideration of how well a provider delivers to groups who share protected characteristics, works with other providers, contributes social and economic value to their localities, enables learners to develop skills and behaviours that employers value, and enhances workforce and governor diversity to reflect the communities they serve. There were also suggestions that Ofsted adopt a plan-based approach and set inspections within the context of that plan

- engaging with local stakeholders who have prepared the LSIP, Chambers of Commerce, MCAs, Employment and Skills Boards (where these exist), and other regional leads, to understand the skills base and regional business needs

- greater focus on adult learning to increase adult participation in FE and help to tackle the skills deficit in maths, English and digital

- making more impact at a system level by undertaking thematic reviews, publishing best practice examples, working more closely with MCAs to understand the local landscape, carrying out separate inspection and grading of colleges within large groups (similar to arrangements for school multi-academy trusts where individual

schools are inspected, with occasional thematic inspection of the trust); and feedback to DfE on what is working well and any unintended consequences

Some respondents felt that inspections already work well. Those who were unsure noted that any changes needed to be clearly communicated.

Providers and provision in scope

Question 41

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

	Total	Percent
Yes	87	85%
No	3	3%
Unsure	12	12%

Question 42

How might apprenticeships best feature in the new accountability system?

There were 67 responses to this question, which was a free-text question.

Summary of responses to questions 41 - 42

A majority of respondents felt that the accountability proposals should apply to as many providers as possible. Some respondents disagreed, citing concerns that, given the disparity in what providers offered, it may not be appropriate to apply the proposals to all providers. Those who were unsure broadly agreed with the intention for a more rationalised approach but reflected that without more detail on how the proposals would apply in certain circumstances it was difficult to comment.

Most respondents were in favour of apprenticeships featuring in the new accountability system, but were keen for the particular features of apprenticeships, compared with other programmes and provision, to be reflected. Many respondents said that they wanted employers to be held to account more effectively for the funding that they receive for apprenticeships and were keen for DfE to review and simplify current apprenticeship accountability arrangements. Some respondents suggested measures that they felt

would be useful to assess apprenticeship performance and identified challenges to take account of when implementing this.

The role of the FE Commissioner

Question 43

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

	Total	Percent
Yes	75	75%
No	9	9%
Unsure	16	16%

Question 44

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

There were 76 responses to this question, which was a free-text question.

Question 45

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

	Total	Percent
Yes	42	45%
No	42	45%
Unsure	10	11%

Question 46

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

There were 71 responses to this question, which was a free-text question.

Summary of responses to questions 43 - 46

A majority of respondents agreed that the FE Commissioner should have a renewed focus on driving improvement and championing excellence. They noted that the FE Commissioner had a valuable role to play in supporting colleges to drive improvement, but that this needed to be considered alongside the involvement of other interested parties, and that it was essential the role was supportive and not punitive. Those who disagreed were concerned that this could undermine the oversight of local authorities. Those who were unsure suggested that further clarity was required on how this would operate in practice and what the implications would be before they could comment further.

Respondents made a number of suggestions on what lessons we can learn from our current approach to formal intervention. Suggestions included a clearer focus on what DfE expectations are and how intervention will be triggered; involvement of the FE Commissioner in providing leadership support where providers are facing challenges; a more streamlined approach bringing the various elements of intervention together into a single approach to minimise the administrative burden of intervention; and a focus on discussion, using what is already readily available to inform intervention and planning.

Respondents who agreed with our proposal to create a three-stage approach to improve college performance commented that this seemed to be a simpler process and would be likely to work better, especially if there was support to facilitate improvement. Those who disagreed felt that the approach would work where a plan has been shown to fail and no other alternatives were available, but that it was very important to allow sufficient time to drive improvement and not prevent the provider from moving forwards. Those who were unsure felt that the approach was welcome for simplicity but that there were a range of ways in which colleges might need intervention and the approach needed to retain flexibility.

Suggestions for specific action that we could take to ensure that performance issues are dealt with quickly and effectively included clear monitoring criteria, consistency of approach across the sector, encouraging a culture in which providers can raise concerns without fear of repercussion to enable earlier identification and engagement over issues, further investment in sector leaders, and providing as much autonomy as possible to help providers respond quickly to issues.

Data collection, audit and assurance

Question 47

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

	Total	Percent
Yes	79	76%
No	4	4%
Unsure	21	20%

Question 48

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

There were 75 responses to this question, which was a free-text question.

Summary of responses to questions 47 - 48

This question reflected on our proposals to introduce digital records for FE learners to make enrolment and recording attendance easier, and to store data in cloud-based servers across the sector to allow data to be viewed on demand and minimise formal submissions. A majority of respondents agreed that a simplified approach would be welcome, provided there was sufficient opportunity for this data to be reviewed and improved before it was finalised. Many respondents noted the importance and value of the ILR and supported moves to improve and enhance this.

Respondents who disagreed felt that the government was too far removed and should focus on improving IT systems generally before introducing new technical solutions regarding data collection. Those who were unsure noted that there was a risk of unintended consequences in placing more responsibility on learners for their role in this process, and noted concerns around seeking to achieve real-time or close to real-time data and the possible burden it might entail.

A range of suggestions were received on how we could keep audit and assurance requirements to a minimum whilst maintaining confidence in the system. Some respondents felt that simplifying funding and reducing the number of rules would make external audit of certain providers simpler by reducing one of the major risk areas, although multiple funding lines remain for many providers and agreement of a single approach by all government departments and local authorities would simplify the approach further. Others suggested a detailed review of the audit system to make it less onerous and punitive, with clearer objectives and/ or a move to audit by exception to engender confidence as well as assuring public funds.

Equalities impact assessment

Question 49

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?)

There were 77 responses to this question, which was a free-text question.

Summary of responses to question 49

A range of suggestions were received. These included alterations to age-based entitlements, as these might have an impact on learners dependent on the age at which they are accessing education and training; and ensuring that providers with a large number of special educational needs and disability (SEN/D) learners are able to access and use the FE Performance Dashboard. Some respondents felt that the proposed reforms might be more likely to have an impact on women as more women access further education; and on some ethnic groups that are proportionately more likely to be accessing further education. Others felt that there could be an impact on more disadvantaged groups, as they are the largest recipients of the funding, which needs to be considered and accounted for.

Annex A: List of organisation that responded to this consultation

This annex sets out the organisations that responded to the consultation. It does not include individuals who responded in a personal capacity, responses where an organisation was not clearly identified, or organisations that requested their responses remain confidential. As such, the number of organisations listed below does not equal the total number of respondents.

- ACCA (Association of Chartered Certified Accountants)
- Access Training (East Midlands) Ltd
- Adult Learning Lewisham
- Association of Employment and Learning Providers (AELP)
- Association of School and College Leaders (ASCL)
- Association of Colleges (AoC)
- Babington
- Basingstoke College of Technology
- Bedford College
- Birmingham City Council
- Birmingham City Council / Birmingham Adult Education Service
- Birmingham Metropolitan College
- Blackpool and The Fylde College
- Bridgwater & Taunton College
- Brinklow
- Bristol City Council
- Bromley London Borough - Bromley Adult Education College
- Buckinghamshire Council
- Cambridgeshire and Peterborough Combined Authority
- Central London Forward
- Cheshire West and Chester Council
- Chichester College Group
- City and Guilds
- City College Peterborough

- Civil Ceremonies Ltd
- Colleges West Midlands and West Midlands Combined Authority
- Cornwall Council (Adult Education)
- DACES, Derbyshire County Council
- Derby Adult Learning Service
- Derby College Group
- Devon County Council
- Dudley College of Technology
- Engineering Construction Industry Training Board (ECITB)
- Edinburgh Climate Change Institute, University of Edinburgh
- Fareham College
- Greater London Authority
- Greater Manchester College Group
- Greater Manchester Combined Authority
- Greater Manchester Learning Provider Network
- GSK (GlaxoSmithKline plc)
- Hackney Education
- Harlow College
- Hartlepool Borough Council
- Health Education England
- HOLEX (Adult Community Education)
- Isle of Wight Council
- Islington Council
- JTL Training
- Kent County Council - Community Learning and Skills
- Kingston Adult Education (part of Royal Borough of Kingston)
- L&WI (Learning and Work Institute)
- Landex
- Learn Trade Skills
- Learning Curve Group
- Local Government Association

- Lifelong Learning London Central
- Lincolnshire County Council
- Liverpool City Region Combined Authority
- Local London sub-regional partnership
- London Borough of Hackney
- London Borough of Hounslow
- London Borough of Wandsworth
- London Councils
- LTE group
- Luton Borough Council
- Luminate
- NCFE
- NCG
- NEFG
- NHS Employers
- NFU (National Farmers Union)
- Norfolk County Council
- Norfolk County Council Adult Learning
- North of Tyne Combined Authority
- North Somerset Council
- Nottingham Trent University
- Oldham Council - Lifelong Learning
- Orchard Hill College
- Petroc College
- Policy Connect
- Premier Global NASM
- Prime Partnership Ltd
- Quality Assurance Agency for Higher Education
- Queen Alexandra College
- Richmond and Hillcroft Adult and Community College
- RSM Risk Assurance Services LLP

- Seetec Group

- Skills and Learning Adult Community Education

- Sandwell Metropolitan Borough Council

- Southampton City College

- St Helens Council Adult and Community Learning (ACL)

- Suffolk County Council

- Surrey County Council

- Sutton College Adult Education

- Tees Valley Combined Authority

- The City Literary Institute & The Institutes for Adult Learning

- The LTE Group

- The St Martin's Group

- Thurrock Adult Community College

- TUC (Trades Union Congress)

- University and College Union

- Venture Forward

- Wakefield Council Adult and Community Learning Service

- WEA (Workers Educational Association)

- West Nottinghamshire College

- West of England Combined Authority

- West Sussex County Council - Adult Community Education

- West Yorkshire Combined Authority

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