

CONSULTATION FORM

Adult Learning in Wales - Consultation on the funding and delivery structure of adult learning in Wales

This consultation seeks your views on proposals to change the funding and delivery structures for adult learning in Wales.

If you have any queries on this consultation, please email:

Post16PlanningandFunding@gov.wales or telephone: 0300 025 3895

General Data Protection Regulation (GDPR)

The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations. Where the Welsh Government undertakes further analysis of consultation responses then this work may be commissioned to be carried out by an accredited third party (e.g. a research organisation or a consultancy company). Any such work will only be undertaken under contract. Welsh Government's standard terms and conditions for such contracts set out strict requirements for the processing and safekeeping of personal data.

In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.

You should also be aware of our responsibilities under Freedom of Information legislation

If your details are published as part of the consultation response then these published reports will be retained indefinitely. Any of your data held otherwise by Welsh Government will be kept for no more than three years.

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Under the data protection legislation, you have the right:

- to be informed of the personal data holds about you and to access it
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- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection.

For further details about the information the Welsh Government holds and its use, or if you want to exercise your rights under the GDPR, please see contact details below:

Data Protection Officer:
Welsh Government
Cathays Park
CARDIFF
CF10 3NQ

e-mail: Data.ProtectionOfficer@gov.wales

The contact details for the Information
Commissioner's Office are:
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 01625 545 745 or 0303 123 1113

Website: <https://ico.org.uk/>

Confidentiality

Responses to consultations may be made public on the internet or in a report.

If you do not want your name and address to be shown on any documents we produce please indicate here

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Type <i>(please select one from the following)</i>	Businesses	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	X
	Other (other groups not listed above)	<input type="checkbox"/>
Questions 12 and 18 relate to your Local Authority area. What Local Authority /Authorities does your response relate to?	We are a national organisation.	

Chapter 1 - Delivering adult learning in Wales

Planning and Reporting

Having an accountable and reliable planning and reporting methodology is a vital component of restructuring the sector.

Q1.	Do you think the adult learning sector should plan and report provision according to the post-16 planning framework for part-time FE?	
Yes		X
No		
Don't Know		
Further comments		
<p>We support a consistent approach to reporting provision across the post-16 sector and believe this is essential to creating a coherent system for learners. The impact of the ACL sector is often not fully appreciated and moving to a consistent approach for reporting would enable the impact of provision to be better benchmarked and understood as part of a joined-up system. Critically, the data should be used in a clear and consistent way to review the impact of adult learning and to identify gaps in need and provision. Partnerships, providers and the Welsh Government / the new PCET body must ensure that the data collected is used to improve provision.</p> <p>However, given the level of the existing grant it will be important to ensure that resources are not unnecessarily diverted away from frontline provision and towards back office reporting structures. A more cost-effective approach could be, for example, to contract an FEI within each local partnership to undertake reporting. Multiple reporting structures across regions would not represent value for money and collaborative structures should be required.</p> <p>A broader review of data collected should also be considered, including qualitative impact that is more than qualifications and attainment. The Adult Learning Partnership Wales should be asked to consider how and what data could be collected to measure the wider impact on learners of their learning experience.</p>		

Q2.	What advantages or disadvantages do you see in taking this approach forward?	
Comments		
<p>In the context of the creation of TERCW, having a coherent planning and reporting framework is essential to ensure that the value of ACL is understood and can be benchmarked appropriately. This will enable the case to be made for additional resourcing for ACL and for progression to be more effectively measured.</p>		

Q3.	If you do not agree with this proposal, what method would you	
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	suggest?	
Comments		
We do not disagree with this proposal.		

Delivery

Model 1: Local Authorities and/or Further Education Colleges to deliver adult learning

We must have a system that is fair and equitable and that ensures learners can access that provision wherever they are in Wales.

Q4.	Do you think that supporting Local Authorities and/or FE Colleges to plan and deliver adult learning is the best way to ensure that provision is delivered fairly and equitably across Wales?	
Yes		
No		X
Don't Know		
Further comments		
<p>We do not think this would be the best arrangement and believe local partnerships would deliver the best value for money, integrate learning opportunities, and promote engagement with disadvantaged learners. While we recognise that in some parts of Wales local authorities or FE Colleges have a track record of delivering adult learning we do not believe that these are the best arrangements for the future. In particular funding FE Colleges directly could potentially result in local authorities withdrawing some of the additional funding and wider support they currently provide. While it is likely there would be some additionality provided by FE Colleges, we believe there is a significant risk that local authority support, including access to community venues and outreach provision, could be impacted upon if direct funding is transferred to colleges across the whole of Wales.</p> <p>As well as this risk we also believe that funding through a single provider would not be the best way to obtain the maximum benefits of partnership working, including with the third sector. Evidence shows that community-based outreach and engagement is needed to reach individuals in most need of this type of support. It is also clear that delivering essential skills to those most in need is strengthened by the ability to develop strong partnerships with other agencies who are trusted by communities and have existing relationships with them. They will be well placed to offer support with signposting, assessing local need, and planning appropriate provision.</p> <p>If local authorities continue to lead the provision then more should be expected of them to integrate adult learning into wider service delivery, for example in community regeneration, schools and services for older people. Currently the extent to which</p>		

adult learning has the opportunity to play a wider role in meeting the needs of local communities is not consistent across Wales and continued funding to local authorities should be tied to an expectation that this will be more fully realised.

Q5.	If we allocate additional funding to FE colleges, do you think we should hypothecate (ring-fence) this funding to ensure that it remains focused on adult learning?	
Yes		X
No		
Don't Know		
Further comments		
<p>If funding is allocated to FE Colleges, it is essential that it is hypothecated and clearly tied to measurable increases in the availability of both provision and outreach and is focused on delivering essential skills for those most in need. We recognise the commitment of FE Colleges to adult learning but also understand the significant financial pressures facing the sector. There is a risk that without hypothecation colleges could be forced (in the medium to long term) to use funding for adult education to meet wider pressures in the system. Given the significant decline in part-time adult learning that has already taken place in the FE sector as a result of budget cuts then not ring-fencing this funding could place provision further at risk.</p>		

Model 2: Adult Learning Partnerships to lead on the delivery of adult learning

Q6.	Do you think that supporting partnerships directly to deliver adult learning would be the best way to ensure that provision is delivered fairly across Wales?	
Yes		X
No		
Don't Know		
Further comments		
<p>We believe funding partnerships directly is the best way to ensure high-quality provision, to integrate learning opportunities and pathways across the public and third sector, and to deliver best value for money.</p> <p>If structured well (see below) they would be able draw in the full range of local partners, including local authorities, schools, further and higher education providers (including Reaching Wider Partnerships), Adult Learning Wales, the third sector, local NHS services, Job Centre Plus, and other public services. Bringing together such a wide-ranging set of stakeholders would help embed collaboration and to create an environment in which to plan a coherent and sustainable curriculum for learners. It would help to ensure the use of shared data and intelligence and to help minimise duplication and bureaucracy, focus resources on provision, provide progression pathways and a co-ordinated approach to engagement and marketing.</p> <p>As identified in the consultation document there is a risk that in some areas local authorities might decide to no longer support the delivery of adult learning in their area. However, experience of successful models working in Wales currently shows that this is not the case where there is a genuine partnership in place and where all partners are signed up to a collective vision and strategy. In our view the regional partnership models offers the best opportunity to ensure local authorities remain engaged and continue to offer support, while at the same time drawing in a broader range of partners to create a coherent curriculum offer in communities. It strikes the appropriate balance in a way that other options potentially won't be able to do.</p>		

Q7.	Do you think that the current partnerships are sufficiently robust and well structured to take on this responsibility?	
Yes		
No		X
Don't Know		
Further comments		
<p>There is a mixed picture across the sector and work will need to be undertaken to ensure that there are robust and well-resourced partnerships in place across the whole of Wales.</p> <p>Our research (both formerly as NIACE and now as Learning and Work Institute) on the delivery of community learning suggests that partnerships should:</p> <ul style="list-style-type: none"> • Have a clear, shared vision and objectives • Be inclusive and have a representative membership • Have strong and consistent commitment from partners 		

- Use robust methods for communities and learners to contribute to identifying need and planning provision
- Have robust methods for ensuring quality and managing performance
- Allocate funding to resource co-ordination and joint work

One specific aspect of the reforms should be for each partnership to employ **Partnership Managers** to co-ordinate the planning and funding of delivery across partner organisations. This would ensure co-ordination across the different service providers can be prioritised and sustained and that partnerships function in an appropriate way to minimise duplication. Alongside this consideration should be given to placing a cap on the proportion of funding which can be used for management and running costs.

While we note the consultation states the Welsh Government will not dictate membership of the partnerships it should be prepared to intervene, if needed, to ensure agreements are reached between local authorities and other partners on the geographical boundaries of partnerships. Similarly, Ministers should be clear with the widest possible range of public service providers and organisations they fund that they will be expected to engage with the partnerships and in planning a coherent local offer for communities. There should be a national, cross-government commitment to maximise the benefits of adult learning, as well as a genuine commitment at a local level to partnership and collaboration.

Finally, there needs to be greater certainty of funding to ensure that partnerships can plan and develop the local curriculum over time. The current annual funding arrangement does not support medium to long-term curriculum development within the sector and placing new partnerships on a three-year cycle would enable providers to plan more collaboratively on a longer-term basis. The requirements of the Well-Being of Future Generations Act should help to create an environment where services can be sustained and delivered using a partnership approach.

Model 3 - a National Community College to coordinate and plan the delivery of adult learning across Wales

Q8.	Do you think that supporting a single national strategic body to oversee the strategic planning and delivery of adult learning would ensure that provision is delivered fairly and equitably across Wales?	
Yes		
No		X
Don't Know		
Further comments		
<p>While we are not opposed in principle to the establishment of a single national strategic body to oversee planning and delivery of adult learning we do not believe it would be the most effective way to respond to local community need and to deliver value for money. We would echo the concerns in the consultation document that a single national body could undermine the local flavour of provision and could potentially lead to local authorities and FE providers withdrawing their wider support for adult learning. Given that many local authorities provide support in excess of the level of the grant and that FE providers will contribute funding to adult learning, it is essential that any new arrangement keeps them as active and engaged partners in delivering provision in their communities.</p> <p>While a single national strategic body could ensure provision is delivered fairly and equitably across Wales we believe the need to retain provision that is responsive to local communities outweighs this consideration. This is why, on balance, we favour a regional partnership model.</p> <p>However, with the creation of the Tertiary Education and Research Commission there could be merit in a single, national body that is able to commission services at a national level. It could also assist with a more co-ordinated approach to marketing and promotion of learning opportunities across Wales. Arguably however this would best be met through a national college that does not deliver provision directly but instead commissions from a network of providers. This would have the advantage of independent scrutiny of the quality of delivery and the impact on need. This could be a similar model to that used for the National Centre for Learning Welsh or potentially through the new TERCW body directly.</p>		

Q9.	Do you believe that the body should be procured?	
Yes		X
No		
Don't Know		
Further comments		
<p>If a National Community College is the preferred model then it should be subject to procurement.</p>		

Q10.	Do you believe an existing FEI should be tasked with fulfilling this role?	
Yes		
No		X
Don't Know		
Further comments		
<p>As stated in response to question 8 we have some concerns about a single organisation that would both commission and deliver services on a national level. However, if an existing FEI was to be tasked with fulfilling this role then Adult Learning Wales would be the most obvious choice given their understanding of the ACL sector and their reach in different parts of Wales.</p>		

Discussion

Q11.	Q11 - Which of the three models outlined would be the most effective in ensuring provision is equitable and accessible to learners across all of Wales?	
	Model 1 – Local authorities and / or Further Education Colleges	
	Model 2 – Adult Learning Partnerships to lead on the delivery of the adult learning	X
	Model 3 – A single National Community College for Adult Learning	

Q12.	Q12 - Which of the three models outlined would be the most effective in ensuring provision is equitable and accessible to learners across your unitary authority?	
	Model 1 – Local authorities and/or Further Education Colleges to lead on the delivery of adult learning	
	Model 2 – Adult Learning Partnerships to lead on the delivery of adult learning;	
	Model 3 – A single National Community College for Adult Learning	

Q12 Not applicable as we are a national organisation.

Chapter 2 - Funding adult learning in Wales

Options for changing the way we distribute the Community Learning Grant (CLG).

The purpose of this consultation is to deliver a system that ensures a more equitable and fairer distribution of funding and delivery of provision across the whole of Wales.

Q13.	Which of the funding options do you support, and why?	
	Funding Option A – allocation derived by population alone	
	Funding Option B - allocation derived by population and Income Deprivation	X
	Funding Option C – allocation derived by population and Education Deprivation	X
	Funding Option D- dissolve the CLG and transfer the funding to the RSG	
Please state your reason		
<p>Including an element of deprivation as part of the funding formula would ensure that the level of need across different local authorities / partnerships is funded and supported. Broadly speaking we believe including income deprivation would give a more rounded view of the need for adult education interventions.</p> <p>However, based on the arguments above we can also see a logic and rationale for deriving the allocation from population and educational deprivation. We would therefore also support this method for allocation if this was the outcome of the consultation.</p>		

Q14.	Why do you believe this option would serve learners best?
Comments	
<p>Adult community-based learning should be the entry pathway for learners back into education. Often these will be learners who will not have had a positive experience of school and who face multiple levels of disadvantage. Including income deprivation as a measure will ensure resources can be greater targeted at those communities with the greatest need.</p> <p>However, given the scale of redistribution from current resourcing levels we believe there should be a period of transition to help partnerships to plan for these changes and for the overall level of resource to be increased. Regardless of how the grant is distributed, the total figure of just over £4m to support this element of community-based learning is clearly insufficient.</p>	

Q15. What has influenced your opinion?

Comments

Low income levels are often the impact of poor qualification or skill levels. Measuring income deprivation would better reflect need and the potential to improve outcomes for people.

Q16. Would you support the idea of a percentage of the funding being set aside each year to fund *Creative Solutions* projects within the sector?

Yes

X

No

Don't Know

Further comments

A Creative Solutions fund could encourage innovation and new projects to support a wider range of learners. The fund should be structured in such a way to encourage and embed collaboration and should only be considered for support by Welsh Government if it also has the support of the relevant local partnership.

However, top slicing from the existing grant would further diminish the level of core resourcing for the sector. Instead, the fund should be additional to the current level of the grant. This would tie additional resourcing to reform, innovation and collaboration and give confidence that there would be improved and measurable outcomes for learners as a result.

Q17. How might this work within your unitary/local authority area?

Comments

Not applicable.

Further Comments

Learning and Work Institute Cymru welcomes the opportunity to respond to the consultation. In our role supporting the Adult Learning Partnership Wales Network on behalf of the Welsh Government, we understand the enormous value of the adult community learning sector and the difference it makes to thousands of lives every year. We also recognise that now is the time to reshape the sector and to make it stronger for the future and equip it to help more learners and communities.

We particularly welcome the recognition from the Minister that for too long community-based adult learning 'has languished as the poor relation to wider post-16 learning.' This is an opportunity to take steps towards addressing this position and to offer learners the chance to learn in their community and to progress to work or further study.

However, while we recognise the consultation is focused on how to allocate and utilise the existing level of the Community Learning Grant it is important also to make the case for additional funding for the sector.

Current levels of funding are clearly inadequate and do not enable a full and enriching curriculum to be developed to meet the needs of learners. In return for reform to how ACL operates, particularly greater partnership working, the Welsh Government should allocate a greater proportion of funding to the sector. This would not only mitigate against the impact of the financial changes being introduced in some local areas but also improve access to opportunities overall. Crucially it could allow innovative partnerships to develop new ways to meet the needs of a more diverse range of learners, including support for working people to improve their employability and progression prospects.

Secondly, it is important to develop further the policy environment in which ACL works. The sector needs to be a key entry point into learning where adults have the opportunity to improve their basic skills, to provide an option to learn in the community, and to offer clear pathways for adults to progress further in their education. A broader vision of lifelong learning for Wales is essential. The policy statement from July 2017, while welcome, was too narrowly focused around essential skills. A broader policy vision should be developed to provide greater coherence for the sector, including flexible entry points and progression pathways. This should include also a focus on developing the skills and professional development of the adult learning workforce.

Taken together, a greater share of overall funding that is allocated in a more equitable way and that is tied to reform and improvement and with a new focus on basic skills and progression routes, will put the sector in a far stronger position to contribute to the wider Welsh Government objectives and help to transform lives and opportunities.

How to respond

Please submit your comments by **11 September 2018**, in any of the following ways:

Email	Post
<p>Please complete the consultation form and send it to: Post16PlanningandFunding@gov.wales</p> <p>[Please include 'Adult Learning consultation' in the subject line]</p>	<p>Please complete the consultation form and send it to:</p> <p>Helen Scaife Further Education and Apprenticeships Division Welsh Government Ty'r Afon Bedwas Road Bedwas Caerphilly CF83 8WT</p>

Additional information

If you have any queries about this consultation, please:

Email: Post16PlanningandFunding@gov.wales

Telephone: 0300 025 3895