

**‘Raising Expectations: enabling the system to deliver’  
consultation: *the information authority* response**

Please tick the box that best describes you as a respondent.

<input type="checkbox"/> Young person (under 18)	<input type="checkbox"/> Parent or carer	<input type="checkbox"/> Adult learner
<input type="checkbox"/> Teaching staff	<input type="checkbox"/> Professional working with young people	<input type="checkbox"/> Headteacher/college principal/leader of educational institution
<input type="checkbox"/> Local authority	<input type="checkbox"/> School	<input type="checkbox"/> General Further Education College
<input type="checkbox"/> Private sector organisation	<input type="checkbox"/> Sixth Form College	<input type="checkbox"/> Voluntary and community sector organisation
<input type="checkbox"/> Tertiary College	<input type="checkbox"/> Work-based learning provider	<input type="checkbox"/> Large employer
<input type="checkbox"/> Small or medium-sized employer	<input checked="" type="checkbox"/> Other (please specify)	

*The information authority* is the body responsible for setting data standards for the FE sector in England and for reducing information related bureaucracy.

**Chapter 2: Local authorities commissioning provision to meet the needs of young people**

1 Do you agree that transferring funding from the LSC to local authorities to create a single local strategic leader for 14-19 education and training is the right approach?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not Sure
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Comments:

The transfer of funding to Local Authorities (LAs) for 14-19 education means new and / or additional commissioning arrangements for some providers. LAs are required to analyse demand and to develop a common application process to track post-16 applications.

To minimise information burden, the commissioning procedures and the associated data used by LAs should be common across LAs, the Young People's Learning Agency (YPLA) and the Skills Funding Agency (SFA).

The governance for data requests from FE institutions regardless of education stage should remain with *the information authority* to ensure a holistic view of information demand. This should include agreement of standard data definitions to avoid significant increases in cost e.g. from changes to IT systems to accommodate a multiplicity of definitions.

A standardised application process should be developed which could be deployed nationally to provide consistency for learners and providers.

### Chapter 3: Operational models for commissioning

2 Do you agree that the model we have proposed for transferring funding to the local authority is the best way to give local authorities effective powers to commission, to balance the budget, create coherence for providers and retain the national funding formula?

Yes

No

Not Sure

Comments:

The proposed model could increase significantly information related bureaucracy, cost and inconsistency within the FE system. This could be avoided if standard practice, process and data definitions are adopted nationally by the Young People's Learning Agency, Local Authorities and the Skills Funding Agency. Standardisation should be encouraged for information provision, analysis and reporting supporting funding, contracting, performance measurement etc. This could include standard formsets and contracts. Where differences are required e.g. in different stages of education, there should be consistency by type of institution, and any matching of data should be done at the data service or agency (YPLA or SFA) level.

In the case of Sixth Form colleges, information is provided currently to FE standards. If Sixth Form colleges are expected to be brought into line with schools there will be a significant one-off cost and disruption.

Do you agree that there is a need for:

3 a) Sub-regional groupings of local authorities for commissioning?

Yes

No

Not Sure

Comments:

This enables fewer commissioning conversations with providers. However, it may not eliminate a multitude of commissioning arrangements for providers which operate regionally or nationally. In some cases, the groupings may be unhelpful for particular providers.

Where collaborative arrangements exist between Local Authorities, the consultation document recognises that timeliness of decisions is more difficult. Therefore the YPLA (and the SFA) should be encouraged to produce and implement published timetables for advice of funding decisions etc. (and the supporting processes). This would assist providers in planning and enable administrative efficiencies.

3 b) Authorities to come together regionally to consider plans collectively?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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3 c) A slim national 14-19 agency with reserve powers to balance the budget and step in if needed?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not Sure
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4 Do you agree that we have described the way that these bodies would function in broadly the right way? Is the balance of responsibilities between them right?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not Sure
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5 Do you agree that there is a need for a single local authority to lead the conversation with each provider?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

This reduces the number of conversations for providers. However, where there is provision both pre- and post- 19, there is still an additional conversation versus today's model.

6 Do you agree with the proposed approach for Learners with Learning Difficulties and/or Disabilities?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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7 a) Do you agree that local authorities should be responsible for commissioning provision for young offenders in custodial institutions?

Yes       No       Not Sure

7 b) Do you favour the 'host' funding model, or the model where 'home' authorities are charged?

Host       Home       Not Sure

Comments:

The 'host' funding model is likely to result in less data bureaucracy than a 'home' model.

7 c) Are there planning or legislative levers other than funding systems which would create the right responsibilities and incentives to promote the best outcomes for this group of young people?

Yes       No       Not Sure

#### Chapter 4: Management of the system

Do you agree with:

8 a) Proposals to ensure that informed learner choices should be a key part of shaping the system?

Yes       No       Not Sure

Comments:

This necessitates good information flows. The use of agreed data standards across the FE system and consistent information processes e.g. analysis and reporting, are critical to support this.

8 b) The proposed approach to a common performance management framework based on the Framework for Excellence?

Yes       No       Not Sure

Comments:

A standard assessment framework across all providers is to be welcomed. The agreement of the detail is important to ensure ease of use for providers of data

and meaningful output for users particularly as the range of providers is increased. Clear governance of the framework and the measures is therefore critical.

The FE information authority currently provides oversight of the FfE. This could continue with appropriate input from the schools sector and / or co-ordination with the Schools Star Chamber. It will be important to keep the model simple.

9 Do you agree with the proposals for managing changes to 16-19 organisation and adjusting the arrangements for 16-19 competitions and presumptions?

Yes

No

X Not Sure

## Chapter 5: Funding

Are you content with the proposals:

10 a) To retain a national funding formula based closely on the existing one?

X Yes

No

Not Sure

Comments:

Consistency in funding drives consistent MI and therefore minimises bureaucracy.

10 b) For funding to flow to institutions on the basis described?

Yes

No

X Not Sure

11 Would you support a move to a single national 14-19 funding system?

Yes

No

X Not Sure

12 Do you agree with the proposals for capital funding?

Yes

No

X Not Sure

## Chapter 6: Implementation

13 Do these proposals about timescale and transition appear reasonable?

Yes

No

X Not Sure

Comments:

In the transition period, guidance should be provided to Local Authorities on how to access existing information at the most appropriate level e.g. LSC / the FE Data Service, rather than from providers. This would enable LAs to prepare without putting an additional burden on providers.

It should be recognised that there will be an additional burden on analysis and reporting teams e.g. in the FE Data Service, while new analysis and reporting routines are embedded. A longer transition period would make this more manageable.

Any new requests for information should be directed through *the information authority* for FE provision.

## Chapter 7: Reforming the post-19 skills system to secure better outcomes for adults

14 Do you agree with the proposal to create a new Skills Funding Agency to replace the Learning and Skills Council post-19?

Yes

No

X Not Sure

15 Do you agree with the proposed role of the Agency?

Yes

No

X Not Sure

## Chapter 8: Funding and commissioning

16 Do you agree with the funding and commissioning role proposed for the Skills Funding Agency?

Yes

No

X Not Sure

Comments:

The use of multiple funding mechanisms e.g. Train to Gain, Skills Accounts etc. is likely to increase data burden. This could be minimised if processes and information feeds for funding whether through Train to Gain, Skills Accounts etc.

are integrated and streamlined. Equally, standard data definitions should be adopted wherever possible.

17 Do the proposals in this chapter reflect the right balance of strategic commissioning and individual customer choice?

Yes       No      X Not Sure

### Chapter 9: Sponsorship of the FE system

18 Do you agree with the proposals on performance management and the performance intervention role of the Skills Funding Agency?

X Yes       No       Not Sure

Comments:

It is helpful to have one body leading on performance management in FE to ensure consistency of information requirements and to minimise data burden.

19 Have we got the right approach to sponsorship of the FE sector as a whole?

Yes       No      X Not Sure

Comments:

Even though sponsorship of FE is with one body (the SFA), the proposed system introduces extra commissioning arrangements for FE providers which span pre- and post- 19 provision. This is likely to increase data (and other administrative) burden.

It is not altogether clear where different types of providers should have funding discussion particularly mid- sized players, and how this might change as the extent of provision changes over time.

The impact of multiple funding bodies can be minimised by nationally agreed data standards. The development of a standard set of processes for data collection, analysis and reporting should be encouraged to reduce inconsistencies.

### Chapter 10: An integrated system: other functions of the Skills Funding Agency

20 Do you agree that each of the functions in this chapter should be performed by the Skills Funding Agency?

Yes       No       Not Sure

## Chapter 11: An integrated system: how the Skills Funding Agency fits into the wider skills landscape

21 Do you agree with this description of the wider skills landscape within which the Skills Funding Agency will operate?

Yes

No

X Not Sure

Comments:

The information authority is supportive of continuing with its existing governance arrangements, in particular to maintain independence.

The information authority is co-ordinating work with the Single Voice (and other self regulation groups).

To enable the appropriate and consistent scrutiny of information requirements and the setting of standards, all requests for new information or changes to data in the FE system (wherever they originate e.g. YPLA, Local Authorities, National Apprenticeship Service(NAS)) should be governed by the FE information authority.

The proliferation of data management within the Skills Funding Agency should be avoided e.g. MI to support Apprenticeships should be provided by the FE Data Service and not separately by NAS.

22 Have you any further comments?

Comments:

It is not clear from the document whether Sixth Form Colleges would continue to be classed within the FE system. To avoid significant changes to information collection and reporting arrangements for Sixth Form Colleges, the data requirements and standards for Sixth Form Colleges should continue to be governed by the FE information authority and provide information to the FE Data Service.

The respective roles of the college and provider representative body in relation to the information authority needs to be resolved including how this works alongside the existing remit from DIUS. Any additional bureaucracy should be avoided.

To facilitate close working of the information authority and the FE Data Service, both organisations should be co-located. Additional governance from the host organisation should be avoided.