



Amicus Response to the LSC Framework for Excellence Consultation

Amicus is the UK's second largest trade union with 1.2 million members across the private and public sectors. Our members work in a range of industries including manufacturing, financial services, print, media, construction and not for profit sectors, local government, education and the health service.

Summary:

- a) Framework for Excellence is being offered as a 'comprehensive and radical approach to performance management in the further education sector' the conduit whereby the Quality Improvement Agency's Pursuit of Excellence proposal will be delivered. Amicus has a number of concerns regarding the strategic purpose of the Framework, and more importantly how it will be implemented and how it will affect staff working in the further education sector.
- b) In the development of any new Framework, all parties affected by that Framework need to be considered. Learners, employers, communities and most importantly all staff working in the further education sector. There is no evidence that staff will be consulted.
- c) Amicus has serious concerns about the already overwhelming levels of bureaucracy and assessment in the further education sector. This Framework has been designed to reduce that level of bureaucracy but we see no concrete evidence of how that is to be achieved.
- d) The number of government bodies and Quangos involved in the sector and in this proposed Framework is incredible. For example, Quality Improvement Agency (QIA), Learning and Skills Council (LSC), Office for Standards in Education (Ofsted) and the Department for Education and Skills (Dfes). This does not include funding bodies, training agencies, corporations, private finance agreement companies or the colleges themselves. This level of bureaucracy is unsustainable and Amicus is convinced this will have a long term detrimental effect on service provision within the sector.
- e) The proposed Framework for Excellence is very similar to the existing Common Inspection Framework. Amicus would prefer to see a consolidation of this existing Framework, rather than the introduction of what looks to be yet another layer of bureaucracy.

- f) Amicus believes that the pursuit of 'Quality Assurance' is forging a path, that although well intentioned, is losing sight of education and training as a process of self development and a way of encouraging social and economic meritocracy.
- g) Amicus has seen no information or acknowledgement of the role trade unions play in the delivery of education, training and skills. This is an omission that cannot be overlooked. The trade union movement has an enviable record in encouraging workers to develop, train and learn, breaking down the barriers to learning and encouraging people from minority ethnic and disadvantaged groups to participate. Lord Leitch highlighted the important role that trade unions play in promoting training and skills. Where trade unions are embedded within Sector Skills Councils and work in partnership with employers there has been proven demonstrable evidence of benefits to staff.
- h) Further education colleges are at the heart of their communities and Amicus has seen no evidence regarding how the new Framework will incorporate and encourage this community involvement.
- i) With the high level of input from many government agencies, Amicus would be interested to see a cost/benefit analysis of how much this new initiative is estimated to cost, and will the initiative add value to the further education sector service provision.

1. Introduction:

- 1.1. Amicus has 20,000 members working within the education sector in the UK. Amicus has a keen interest in any proposed changes, new initiatives or improvement strategies that could affect the education sector. Amicus has a thriving and well resourced life long learning department with around 2000 Union Learning Representatives. We also enjoy partnership working with training and skills establishments and have extensive working links with academics and academic institutions.
- 1.2. Further education (FE) colleges are the conduit whereby many people in the UK enter into life long learning. Each year FE colleges provide new opportunities for academic, career and personal development to hundreds of thousands of learners. It is clear that the FE sector itself has grown exponentially since the incorporation of the colleges in 1993.
- 1.3. FE provision has changed dramatically in recent years and there is now a concern that many people are unclear about the role and purpose of the sector. Amicus is clear that FE provision needs to be linked to the economic, technological and societal imperatives of the UK. To provide a service that is easy to navigate for learners and has a simple progression to higher levels of educational qualifications.

1.4. If FE is to be of maximum benefit to the learner, employers, the local community and the economy then colleges must offer the right courses at the right time in the right places. Fundamentally the knowledge economy is about people, and the people who are as equally important in the debate about the FE sector are those that work within the sector, the teachers, support staff and background staff who all work incredibly hard to ensure the service they are offering to learners is the best possible. Amicus believes that the voice of these people is not being heard or considered in this proposal. There is no consultation with staff or learners mentioned and there is no indication that the wider community will be considered.

2. Framework for Excellence Proposal:

2.1. The Framework for Excellence is being offered as a 'comprehensive and radical approach to performance management in the FE sector'¹ this framework is being presented as the device by which FE colleges can be monitored (by themselves) attain excellence and if failing; to follow a model of aspiration that will enable them to succeed. Amicus has serious concerns with the proposals for the framework.

2.2. One of our main concerns is the proposal that the new criteria for completing the Framework questionnaire will incorporate questions of a similar nature to that of the Common Inspection Framework (CIF). 'there is a strong correlation between the seven key performance indicators (KPI's) and the evaluative statements in the Common Inspection framework'² if this is the case why does there need to be another level of bureaucracy and competency evaluation. Amicus would question whether this framework is relevant under the auspices of the proposals by the Quality Improvement Agency (QIA). Especially in relation to their comments to rationalise and reduce the level of bureaucracy currently in place in the monitoring of FE provision and service.

2.3. The further education sector is already incredibly complex and bureaucratic, with 50 funding bodies, numerous assessment organisations and hundreds of corporations and other service providers. It is clear to Amicus that the sector is already seriously overburdened with assessment and monitoring procedures and any changes that add to that burden are unacceptable. Introducing competition is not the way to solve the problem, this is short termism at its worst and is the path to further privatisation of the sector.

2.4. The further education sector has a long history of evaluation, self analysis and the provision of quantifiable data. However, Amicus does not see where this Framework will enhance, improve or rationalise the existing arrangements. Amicus would ask the Learning and Skills Council (LSC) to reconsider the proposals for this Framework and consider looking at the existing CIF to see whether this could be modified or consolidated.

¹ Bill Rammell MP, Minister of State for Life Long Learning, Further and Higher Education

² LSC Framework for Excellence – A Comprehensive Performance Assessment Framework for the Further Education System, p. 3

2.5. Amicus is also concerned that the pursuit of 'quality assurance' will involve even further levels of bureaucracy. This in turn will mean changes to existing procedures, new ways of working for existing staff and could include training to enable staff to collate the information required by the new Framework. If this is the case, how does the LSC envisage the Framework 'being delivered well in a short period of time'³ this burden of even more self assessment and monitoring will stretch the colleges workforce extensively and Amicus is concerned that service provision to learners will diminish in the quest to respond to proposals such as this. This would be especially significant in relation to learners from minority ethnic groups or learners from disadvantaged sections of society.

2.6. The LSC envisage that the design of the scales; which will provide a backbone to the Framework, will be designed by a tripartite of the LSC, the Dfes and Ofsted. It is also suggested in the consultation document that the LSC will work with the QIA, Ofsted and the Dfes to 'develop a robust and consistent approach to validation' this sounds like bureaucracy gone mad. Why does it take three different agencies to design a set of scales for the Framework and a further three agencies to provide the validation criteria for the Framework.

2.7. It is clear to Amicus that there is too much flux in the education sector. It is impossible for any new initiative or proposal to 'bed down' or be implemented successfully before another initiative, policy change or government Bill comes along and the process starts again. The consultation document states that 'the arrangements for the implementation of the Framework will take three years and will represent a substantial programme of work, involving extensive design and development, consultation, communication, guidance, trialling and piloting' Amicus would be interested to know how much this project is costing and whether a cost/benefit analysis has been undertaken.

3. Role of Trade Unions in Learning and Skills:

3.1. Our main consideration is for our members, staff working in FE colleges and the wider community, all of whom are users of the FE service provision. Will the implementation of this Framework really benefit them, their employers and the communities that the further education colleges were created to support?

3.2. Amicus would also ask why is there no provision for trade unions to become more involved strategically in the role of FE colleges. Trade unions have an enviable record on learning and skills. The present Government has made it clear that they see trade unions as a willing (and able) conduit to progress the learning and skills agenda, especially in relation to breaking down barriers to learning and

³ LSC Framework for Excellence – A Comprehensive Performance Assessment Framework for the Further Education System, Foreword

encouraging workers to develop their education, skills and training in a safe and secure environment.

3.3. There is no mention in either of the consultation documents about the role of trade unions, this is a grievous omission and Amicus would hope that the LSC and the QIA will reconsider this situation.

3.4. Further education colleges are at the heart of local communities, Amicus would like to consider how this is to be accommodated with the new proposed Framework and also how equality and diversity will be encouraged and promoted.

4. Conclusion

4.1. For many prospective learners who suffer disadvantage FE colleges are the open doors to learning that can influence a major difference to their educational attainment. The UK's long term economic prosperity and productivity is hugely dependent upon a highly skilled, well educated and value added workforce. When compared with other nations the UK consistently fails to compare with the educational achievements of countries such as Sweden, Finland, USA and Germany. At the heart of UK education provision is the further education sector. Too many assaults on the nature, structure and enablement of the sector will mean that service provision will deteriorate. A period of rationalisation will then ensue and the agencies involved in this process will close institutions that do not meet the measure of excellence set down in Frameworks such as this one. We cannot allow this to happen without a full and frank analysis of what is currently happening to education in the UK today.

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