



Amicus Response to the Financial Services Skills Council
consultation on the draft Financial Services Foundation Degree
Framework

1. **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 financial services, manufacturing, print, media, construction and not for profit sectors, local government, education and NHS health professions.**
2. The union represents some 200,000 workers across the finance sector.
3. We feel that the consultation questionnaire is a more appropriate vehicle for employers' responses than for a trade union and our response is therefore elaborated below. We firstly address some of the conceptual issues with the Framework, before briefly addressing some points of detail.
4. Amicus views the Framework as a positive development, on which the FSSC should be applauded. Fundamentally, an initiative providing accredited learning opportunities, offering increased employability and clear progression routes for finance sector workers accords with our strategic objectives around lifelong learning and is therefore something we would wish to support.
5. The notion of widening participation in Higher Education to non-traditional learners and the objective of achieving this through a vocational route is laudable. The business context section throws this into sharper relief, in that there is clearly a need to develop the associate professional and technician skills that seem likely to be in increasing demand.
6. In the detail also, there is much for Amicus to support. It is clear that the FSSC has taken a very considered approach to building in

flexibility, Accreditation of Prior Learning (APL) and Accreditation of Prior Experiential Learning (APEL).

7. The suggestion of the incorporation of “Learning to Learn” units into the overall qualification is very welcome. **Amicus is strongly in agreement with the principle of the framework’s stance on the availability of standalone modules, credit transfer and accumulation**, which is very much borne out by our experience of learning delivery and working with HE providers.
8. Equally, it is encouraging to see the level of commitment to adopting varied modes of delivery, although we do have some reservations on this point, which we return to below (para 15). **However, we wish to record a number of areas of concern:**
9. The most significant issue that the Framework raises relates to the very core of the FSSC’s reasons for trying to establish foundation degrees and the nature of the industry. Section 1.1 describes the structure of the industry and we can see that it is dominated by small employers, but we know that this situation does not reflect the overall pattern of employment – that is to say that a significant proportion of finance sector employees are working in large employers. Specifically, **we need to understand whether the FSSC’s objective is to maximise participation of employers (i.e. the number of employers offering access to foundation degrees) or to improve the skill-set of employees in the sector.** Clearly the Framework is likely to mean different things to employers of different sizes and between different sectors of the industry.
10. The FSSC has quite correctly built in some excellent, best practice dimensions to the framework around input to programme design, coaching, mentoring, accreditation of experiential learning, work-based assessment, etc. Together these should provide a robust underpinning for learner-support and acquisition of high-level, industry-relevant skills and knowledge. This is something akin to an opening up of the kind of support we see in graduate-development programmes to the general workforce, precisely the kind of initiative that we would advocate. The paradox here is, of course, that this kind of infrastructure also requires significant **investment of resources and time.** Quality Assurance would demand that any in house support be conducted to a high level, necessitating training for the mentors. Also, as the document states, “Employers within financial services will always seek to minimize the ‘down time’ involved” (p.30) and this is part of the reason that it is mainly graduates within the industry who tend to benefit from this kind of ‘Rolls Royce’ approach to development.
11. In the context of off-shoring, the skills-polarisation that major employers in the sector have pursued over the last two decades or so and the continued adherence to the belief that developing employees leads them to get better paid work elsewhere, it is hard to imagine foundation

degree programmes becoming widely available to 'back office' employees (particularly when most major employers already have graduate intake for their high-flyers). Similarly, small employers are unlikely to have the resources or expertise to make this happen. The £300m spent annually on training in the sector seems destined to remain skewed in favour of those on career trajectories.

12. The conclusion that Amicus draws from this is that there is a **need for a significant shift in approach from employers** if Foundation Degrees are to be successfully implemented and perpetuation of existing problems around training in the sector is to be avoided. **Trade unions can play a significant role in this through collective bargaining**, which makes it all the more disappointing that there is a singular absence in the Framework of any mention of trade union involvement in foundation degree programmes.
13. Beyond this most obvious area around **promotion of the foundation degrees to employers (especially those currently not directly engaged with the FSSC) and to our members**, there are a number of other practical areas in which Amicus could usefully become involved. For example, the strategy asserts that "Partnerships between employers, [education providers] and professional bodies are...vital in providing programmes that are relevant, valid and responsive to the needs of learners" (p. 10). **Clearly learners' needs can most effectively be articulated at design stage through their trade unions.**
14. Moreover, we would suggest that if "Line managers could be encouraged to nominate people they feel should be supported through a foundation degree" (p11) **it would be appropriate for unions to have some involvement in devising the criteria for selection, if equal opportunities are to be upheld.**
15. **Trade unions would also have a natural role in ongoing monitoring and overall review of the effectiveness of these programmes**, providing the student representation at review that the document refers to.
16. The other main area of trade union involvement would focus on the **individual assistance that we provide for members**. It is fair to say that most learners will be unfamiliar with the finer points of Higher Education or the demands likely to be placed on them. Through our **Union Learning Representative networks we can help provide independent Information, Advice and Guidance** around all aspects of the three way learning agreement and help advise members on such issues as APL, formative assessment, etc. We can ensure that learners go into the foundation degree programme with their eyes open.

17. All of this leads Amicus to suggest that, at the very least, the **FSSC should be pressing employers to enter dialogue with recognised trade unions**, where present, as a part of the process for approval of any proposed foundation degree programme.
18. Turning to the points of detail, we wish to highlight the following:
19. Section 3.2 discusses different models of incorporation of existing qualifications and experience. There is nothing inherently wrong in any of the models suggested, but the key point that we would wish to make here is the **need to retain flexibility** and not to make this a choice between one method or another. “The FSSC recommends that the learner and employer are put at the heart of all discussions” (p 15) but as is also pointed out, APEL is fraught with problems. Our experience is that providers are not always disposed to be as flexible as might be hoped, so **employers may need to draw support from the FSSC and individuals may need access to independent information, advice and guidance.**
20. Section 5.2 outlines potential modes of delivery and it is good to see different modes being considered. Again, however, there may be tensions between these modes and issues of time and resourcing. Also, the question of provider flexibility arises again. **There is a need to ensure that different modes are incorporated for the benefit of the learning experience**, rather than the provider’s convenience or because the provider has accessed funding to experiment with a different mode of delivery. Again, the FSSC needs to be assured about these points.
21. Recognition of different learning styles and levels of base skills (section 5.3) is encouraging. Consideration does need to be given to **how these base skills could be addressed, what support could be given to learners who demonstrate needs in skills not contained within the programme, etc.** It should also be noted that there may be a **need for confidentiality between the tutor and student.** With these issues in mind Amicus does not feel that the model learning agreement (p.32/3) places sufficient responsibility on the provider, or reflects earlier statements in the Framework around learner-centred delivery and flexibility. We would suggest that the **“effective personal tutor programme” (p.39) should be an FSSC demand**, rather than a recommendation.
22. In summary, Amicus is in support of the Framework, with the reservations noted above. We would be happy to discuss any of these points in more detail with the FSSC.

**John Earls
Research Section Head
Amicus**

**David Fleming
National Officer
Amicus Finance Sector**

July 2006

Contact for further information :
John Earls
Research Section Head
Amicus
t : 020 7780 4004
e ; john.earls@amicustheunion.org