



## Outcome Based Success Measures – The Next Stage Response form

The department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

**The closing date for this consultation is 2 December 2015.**

Please return completed forms to:

Email: [FESuccessmeasures@bis.gsi.gov.uk](mailto:FESuccessmeasures@bis.gsi.gov.uk)

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When responding please state whether you are responding as an individual or representing the views of an organisation.

I am responding as an individual

I am responding on behalf of an organisation

What is your name? Ailin O’Cathain

What is your email address? ailin.ocathain@awarding.org.uk

What is the name of your organisation (if appropriate)?

Federation of Awarding Bodies

What is your job title? Policy Manager

Please tick a box from a list of options in the table below that best describes you as a respondent. If you are responding on behalf of an organisation, please make it clear who the organisation represents by selecting the appropriate interest group in the table below and, where applicable, how the views of members were assembled.

X	Business representative organisation/trade body
	Business
	LEP
	FE sector representative organisation/trade body
	FE College
	FE private training provider
	Other education (please describe)
	Local Government
	Trade union or staff association
	Charity or social enterprise
	Student representative body
	Individual
	Other (please describe)

The Federation of Awarding Bodies (FAB) is the membership organisation for vocational awarding bodies and we currently have over 120 awarding bodies in membership. Our members range from generic awarding bodies to small specialist organisations and they provide a wide range of vocational qualifications to their chosen markets.

The Federation wishes to make the following submission for your consideration. This response is submitted on behalf of the FAB membership following consultation with them and with the Federation's Board of Directors. Awarding bodies are a diverse community and our members may wish to make their own individual submissions containing their own particular perspectives and emphases, in addition to any comments forwarded to FAB for inclusion in this overall response.

***The Federation's response has been produced to address the questions within the consultation that we feel are of particular relevance to our members and we have not responded to every question.***

**Question 1: Do you agree with the proposed new progression measure? (see paragraph 35)**

Yes

No

Not sure

**Comments:**

The Federation believes that the provision of outcome data at both provider and qualification level could have a number of potential benefits for learners, employers and other stakeholders. We can understand that having access to data on destination, progression and earnings could be useful and could support the decision-making process for learners in particular. However, we also believe that it is crucial that the extent to which users of the data can rely on it for a range of purposes is made clear in an overt way and on an on-going basis. It is the clarity of the data and its uses that we have a number of concerns about, including :

1. How clarity will be provided to learners in relation to the fact that the data only represents those learners who have accessed public funding and that the data does not include those who have progressed to a self-employed status (which a common model in some sectors) or moved abroad. The limitations of the data will need to be clearly presented to ensure that future learners and employers are not misled and that the quality of provision and the relevance of qualifications are not misrepresented. For some qualifications the number of learners who are funded represents only a small proportion of the total cohort and it will be important to ensure that learners and employers understand what the data is showing them. The small size of some courses and qualifications will also amplify any weaknesses in the data.
2. The fact that the data will be lagging and that the situation within sector workforces and providers may well have changed since the data was collated and published. This may be a particular concern in fast-moving sectors where skills needs have changed or emerged in relatively short periods of time.
3. How the government intends to ensure that the data is not misused, either deliberately or erroneously to support claims that it cannot legitimately be used to support. Clear statements on the intended and legitimate use of the data should be published alongside the data and the government should be prepared to publicly challenge misuse/misrepresentation of the data.
4. Clarity that progression to another programme of the same level has not been included in the data even though this progression could be of value to the learners. For example, a learner could progress from a level 2 course into a level 2 apprenticeship and such progression is

likely to be of significant value to the learner. The consultation document suggests that this progression will not be counted because it is not at a higher level. It does however provide a broader range of skills, or adds a practical aspect to previous theoretical knowledge, therefore it can significantly improve the employment skills of the learner and is very much in keeping with government policy to delivery 3m apprenticeships in this parliament.

5. The Federation welcomes the on-going work to investigate whether the local context can have an impact on the outcome measures.

**Question 2: Do you agree with the principles and features underpinning the extended Minimum Standards framework? (see paragraphs 54-59)**

Yes  No  Not sure

Comments:

**Question 3: Do you agree with the proposals for how the new Minimum Standards framework would be used? (see paragraphs 61-70)**

Yes  No  Not sure

Comments:

The Federation is concerned that the minimum standards could place pressure on some providers and could drive undesirable behaviour such as learners being encouraged to progress into higher level learning programmes for which they are not ready or able to achieve so the provider's data is improved. Similarly, previous outcome based systems have resulted in weaker providers finding ways to have learners 'employed' for the required period of time to ensure their data looks more favourable. We need to be clear that the need is for sustained employment for learners, not for employment that finishes the day after the cut-off point for being included in the statistics.

**Question 4: Is the proposal for treating learning for the unemployed as a separate type of learning for the purposes of Minimum Standards a fair way of accounting for those learners? (see paragraphs 71-72)**

Comments:

Yes, the Federation agrees that it is important that providers are not disadvantaged for providing opportunities for unemployed learners.

**Question 5: What is your view on whether we need to make any special allowance for learners with learning difficulties and disabilities in the destination measures Minimum Standards framework? (see paragraphs 73-74)**

The Federation agrees that further exploration is required to ensure that the destination of these learners will not impact on the data for specific providers. We would not wish for learners with learning difficulties to be disadvantaged because providers believe they impact adversely on the data.

**Question 6: Do you agree that the outcome measures should form a core set of measures for local outcome agreements? (see paragraphs 76-78)**

Yes  No  Not sure

Comments:

**Question 7: In order to inform local outcome agreements, what other information is needed alongside the outcomes measures data? (see paragraphs 76-78)**

Comments:

**Question 8: Do you support the idea of a widget sitting on providers' own websites with a consistent set and presentation of data? (see paragraphs 86-90)**

If the concerns about data accuracy expressed above can be addressed, then it would be useful to have a consistent approach to the presentation of the data on providers' websites as this would help learners and other stakeholders to compare like with like. Implementation of the widget should not however present providers with any additional costs for either the implementation or maintenance of the widget.

**Question 9: Do you support the idea of an FE performance table focused on apprenticeships and higher levels of learning? (see paragraphs 91-92)**

Yes  No  Not sure

Comments

**Question 10: Do you agree that individual scorecards will provide a useful tool for both providers and the key local stakeholders with whom they are working? (see paragraphs 96-101)**

Yes  No  Not sure

Comments

**If you have other comments about the consultation that do not fall within one of the questions, please include them here.**

1. The data has the potential to be of use to awarding organisations who are currently tracking the impact that their qualifications have on the lives of their learners and the extent to which they lead to progression and employment.
2. On a practical point, the formatting of the response form made it difficult to complete and meant that a significant amount of time was required to reformat text etc.
3. The main concerns are that that the data is incomplete, with learners in positive outcomes such as self-employment not represented, it is retrospective, reflecting the provision several years earlier, it has the potential to penalise providers who have a broader recruitment policy and challenge learners with qualification levels that are at the top end of their ability.

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

X

Please acknowledge this reply Yes

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

Yes  No