

Raising Expectations: enabling
the system to deliver
(Joint DCSF/DIUS consultation)
Consultation Response Form

The closing date for this consultation is: 9 June
2008

Your comments must reach us by that date.

department for
children, schools and families

Department for
**Innovation,
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Skills**

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Please tick if you want us to keep your response confidential.

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If your enquiry is related to the policy content of the consultation you can contact James Addy on:

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If you have a query relating to the consultation process you can contact the Consultation Unit on:

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

<input type="checkbox"/>	Adult
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<input type="checkbox"/>	Education
<input type="checkbox"/>	Voluntary
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<input type="checkbox"/>	Organization
<input type="checkbox"/>	Large

<p>Please Specify: Trade union</p>	
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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?

Not Sure

<p>Comments: UCU on the whole agrees with transferring funding from the LSC to local authorities. We believe that it is desirable to have one public body responsible for the strategic leadership of 14-19 education and training. With the transformation of local education authorities into Children's Services departments, alongside the various mechanisms and procedures local authorities will need when the age of participation in learning is raised, and with the services for information, advice and guidance of young people moving to local authorities, it makes sense to give local authorities the strategic leadership of 14-19 education. In addition the LSC is not a democratic body and there has been a democratic deficit within the whole LSC system since its creation. Giving local authorities the strategic leadership of 14-19, does go some way to redress this.</p> <p>These proposals and indeed the splitting of the DfES into DCSF and DIUS, pose a problem for the overall position of FE in the system. A large part of FE's provision is ultimately under the direction of DCSF whilst FE colleges themselves remain in the remit of DIUS. This may cause confusion, and some disjunctions. Many FE programmes of learning are delivered to mixed groups of young people and adults. UCU believes that it would have been preferable to move the whole of FE into the remit of one or other of the new Departments, and wholly to the strategic leadership of democratically accountable public bodies.</p> <p>UCU is also concerned that the changes proposed are very complex, and may not be well understood by all stakeholders in 14-19 education and training, especially the young people themselves and their parents and carers. There is a danger that the role of trade unions in the new system is not articulated clearly enough. There is potential for the complexity of the funding and delivery arrangements undermining the central thrust of the Government's 14-19 reforms</p>	
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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?

Not Sure

<p>Comments: UCU considers that overall transferring funding is probably a reasonable way of giving local authorities effective powers to commission, balance the budget, and create coherence for providers. We certainly support the creation of a national funding formula. We are concerned that the actual commissioning will be split with the local authority commissioning courses for 16-19 year olds from schools and sixth form colleges while the Young People's Learning Agency (YPLA) or sub-regional partnerships will be commissioning courses for the same young people from further education colleges and private training providers.</p> <p>However we would urge that there should be some flexibility in arriving at final arrangements for any particular area. An alternative approach would be to have a single point of responsibility for commissioning provision. Which body might be that single point could vary depending on local circumstances. For example for rural areas this could be the local authority. In other areas such as urban ones it might be beneficial for it to be a sub-regional partnership. Such an approach would need a strong national commissioning framework to protect the interests of those crossing boundaries to learn. The most significant benefit is that this approach would ensure consistent approaches towards funding and performance management for all the institutions in a particular area, including colleges, schools and training providers. We note that the DCSF publication, '14-19 partnerships and plans' puts forward 3 different models of how 14-19 partnerships have been developing which take into account different local circumstances. Whatever approach for commissioning is finally used, UCU firmly believes that it must cover all 14-19 provision, including that made by Academies. There have been concerns about the collaboration with other local providers in some areas. Their full involvement in the 14-19 changes would be greatly assisted by bringing them under local authority control and strategic leadership</p>	
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Do you agree that there is a need for:

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

Not Sure

<p>Comments: The proposal for sub regional clusters is a positive one. It does take into account the position of FE colleges in 14-19 provision. It is particularly important for areas where there is considerable travel to provision by young people across local authority boundaries.</p>	
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3 b) Authorities to come together regionally to consider plans collectively?

Not Sure

<p>Comments:</p> <p>UCU supports the proposals for local authorities to come together to consider their 14-19 plans. It would make sense for this to happen at a regional level. It will also be beneficial for 14-19 strategic plans to link to regional skills plans and to plans for adult learning. It will be important for Government to stress the importance of these regional links, and to facilitate them. We are concerned that some of the regional level fora may become mere talking shops and discontinue because of lack of interest or real activity.</p> <p>The level of regional activity proposed should be helpful in terms of specialist provision, including where there are national centres of excellence for particular subject and vocational areas, and for specialist provision for those with learning difficulties/disabilities.</p>	
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3 c) A slim national 14-19 agency with reserve powers to balance the budget and step in if needed?

Not Sure

<p>Comments:</p> <p>We support the proposal for a Young People's Learning Agency (YPLA). Such an agency is required to set national funding rates and methodology. It is unthinkable that we would return to nearly 150 differing funding methodologies for 14 to 19 based on local authorities. The YPLA will also be needed, as stated in the consultation document, to act as broker where local authorities cannot agree the sub-regional arrangements. Clearly the YPLA will need reserve powers for necessary intervention, even where there has been local agreement, and to protect the interests of certain groups of young people such as those with learning difficulties/disabilities and juvenile offenders in local authority secure units.</p>	
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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?

Not Sure

<p>Comments: The ways described for the different bodies to function are broadly correct. However we do have reservations, stated above, as to the way commissioning might work. We are urging there should be greater flexibility to suit different circumstances.</p>	
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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?

Not Sure

<p>Comments: We agree with the proposal that each FE institution should have a lead local authority and that this authority should lead the conversation. Clearly this lead will have to follow the policies and arrangements made in sub-regional partnerships. Other issues will need to be covered around the relationship between individual local authorities and colleges. How will resources actually be routed from national government to individual colleges via the local authorities? How will the receipt of all funds to institutions be ensured? Will there need to be funding agreements or memoranda between the institutions and the local authority? If so, will these be standardised?</p> <p>One of the issues that UCU considers not to have been satisfactorily explained in the consultation document is how intervention will work in colleges. It is clear that local authorities will have an interest in the quality of a college. It is equally clear that intervention lies within the remit of the new Skills Funding Agency (SFA). Despite some injunctions on both the SFA and local authorities not to take actions which might have a damaging or perverse impact on the responsibilities of the other partner, it is still not clear to the union exactly how any intervention will work. There are also aspects of self-regulation of further education which need to be clarified in relation to the move of 14-19 to local authorities. Similarly issues around information, data collection and reporting as well as bureaucracy reduction for FE, as compared to those pertaining to schools, will need to be resolved.</p>	
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6 Do you agree with the proposed approach for Learners with Learning Difficulties and/or Disabilities?

Not Sure

<p>Comments: The proposed approach to give local authorities the duty to provide for those learners with learning difficulties/disabilities is very much welcomed by UCU. It will be very beneficial to have one body responsible for this. Where such responsibilities are shared cracks can appear into which some can get lost. We would also wish to state that having the local authority responsible for LDD to the age of 25 should not in any way reduce the choices that young people with LDD have in terms of learning programmes or institution. It may be a huge task for local authorities to assume responsibility for this from the very start of the new arrangements on 14-19. It may be worth considering that the YPLA should initially take responsibility for the planning and funding of provision for students with learning difficulties and disabilities, perhaps for the first year but progressively delegate these responsibilities as time passes. This would ensure a smooth transition from existing Learning and Skills Council arrangements and minimize disruption for a vulnerable group of young people This would also create opportunities to pilot alternative approaches in different parts of the country.</p>	
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7 a) Do you agree that local authorities should be responsible for commissioning provision for young offenders in custodial institutions?

Not Sure

<p>Comments: We agree with the proposal for local authorities being responsible for commissioning provision for young offenders in custodial institutions. As with young people with LDD, there may be an argument for the YPLA assuming the responsibility in the early stages of the transfer. We also consider there will need to be arrangements with provision for young people who are custody in the adult prison estate; that is young people in Young Offenders' Institutions and even adult prisons where there responsibility will lie with DIUS and the Offenders Learning and Skills Service.</p>	
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7 b) Do you favour the 'host' funding model, or the model where 'home' authorities are charged?

Not St

<p>Comments: We would wish to see further consultation with both the secure units themselves, the various local authorities and other agencies concerned with juvenile offenders.</p>	
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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?

Not Sure

<p>Comments: This is not an area where UCU has great expertise as UCU members in prison education are usually working with adults and young offenders over the age of 18. However we do believe that inspection and the use of the Common Inspection Framework could be an important lever in raising quality and ensuring the best outcomes for these young people. We also believe that there must be important lessons and messages that can be gained from the local partnerships that have developed around Youth Justice Boards and work.</p>	
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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?

Not Sure

<p>Comments: Informed learner choice must be a key part in shaping the new system as it will allow local authorities and providers to plan provision to meet these choices. We are mindful that there are changes in progress to give local authorities the lead in planning and commissioning such services, as well as ensuring that the information, advice and guidance to young people are independent and impartial and unaffected by institutional issues and preferences.</p>	
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8 b) The proposed approach to a common performance management framework based on the Framework for Excellence?

Not Sure

<p>Comments: There must be a common performance management framework that covers all 16-19 providers. Despite UCU having reservations about the Framework for Excellence, not least the lack of performance indicators covering the workforce, it is probably the best basis for such a framework. We would want to consider this more fully when all the evaluations and results from the pilot that is taking place with the Framework for Excellence in 100 providers. There would need to be some adjustments made if the Framework for Excellence was used for schools. For example the performance indicators around financial strength would be inappropriate for schools given their relationships with local authorities around funding.</p>	
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8 c) The local authority role in commissioning to improve quality?

Not Sure

<p>Comments:</p> <p>We welcome the proposal that local authorities will have a duty to ensure that there is sufficient provision for all young people in their area and to ensure there is access to the new curriculum and qualifications. We note that they will have a duty to promote high standards and quality provision. It is clear that the commissioning process will be a major vehicle in exercising these duties. However we do not agree with the suggestion that local authorities might run competitions for particular provision perceived as weak and of poor quality with no comparable provision nearby. UCU considers that it would be far better to support existing provision to become better and stronger. There are and will be intervention powers to enable this.</p>	
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9 Do you agree with the proposals for managing changes to 16-19 organisation and adjusting the arrangements for 16-19 competitions and presumptions?

Not Sure

<p><i>Comments:</i> UCU agrees that the local authority in having strategic leadership of 16-19, should be able to reshape and restructure its 16-19 provision. We welcome the statement in the consultation document that there is no single best model for 16-19 education that can be applied in all situations. Whilst agreeing with the key things that might demonstrate effectiveness in 16-19 provision cited in the consultation document, we would also want to include equality aspects and promoting community cohesion in any such consideration. We regret that the 'expansion presumption' will continue as we consider that this is an element for instability. However we do support the proposition that there will be a requirement for local collaboration to be evidenced and for any new places to be integrated with the existing offer. We therefore support the proposal that the Decision Maker's guidance will be amended so that statutory proposals to expand a school under the sixth form presumption will take account of the need for collaboration with local partners, the local 16-19 organisations. We also support this being extended to all local publicly funded schools included Academies. It is possible for DCSF to take action now on this issue; it does not need to wait for planned legislation. Implementation can happen by changing the regulations made under the 2006 Education and Inspections Act and the instructions given to the Learning and Skills Council about the use of its capital fund. We recommend that DCSF makes these changes sooner rather than later (i.e. in 2008 rather than 2010).</p>	
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Chapter 5: Funding

Are you content with the proposals:

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

Not Sure

<p>Comments:</p> <p>It is imperative that a national funding formula is maintained if the principles set out in the 2006 White Paper 'Raising Skills: improving life chances' are to be implemented. These would include: comparable funding for comparable qualifications regardless of the place of learning; sufficient funding for national qualifications regardless of location; proper incentives for engagement of disadvantaged learners and that the funding methodology used is transparent and as simple as is possible.</p> <p>We trust that the commitment in the consultation paper on 'comparable funding for comparable provision' will result in the ending of the funding gap between schools and colleges for 16-19 provision. We note that despite some action by the Government, recent research from the AoC seems to show that the gap remains as large as it was. UCU would also urge that the closing of this funding gap would also mean that the Government intended to deal with the continuing pay gap between school teachers and college lecturers. This becomes even more apparent as the 14-19 agenda develops, and teachers and lecturers are increasingly working together to deliver the same learning programmes and qualifications.</p>	
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10 b) For funding to flow to institutions on the basis described?

Not Sure

<p>Comments:</p> <p>We agree with the processes for funding to flow to institutions as described in the consultation document. It should ensure a degree of stability as well as allowing institutions to respond to learner decisions. There may need to be consideration of some form of safety nets if funding allocations are to be made on the basis of current recruitment levels and adjustments made later for known changes. We also agree that the YPLA should pay agreed allocations to each local authority within a ring fenced 16-18 grant.</p>	
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11 Would you support a move to a single national 14-19 funding system?

Not Sure

<p>Comments: There would be much to commend a move to a single national 14-19 funding system; not least the recognition reinforced by funding that 14-19 education and training can only be delivered properly by partnerships of providers. So funding would begin to match curriculum developments such as the introduction of the new Diplomas. Such a single national system would also recognise that FE colleges are increasingly providing learning for 14 to 16 year olds. However there changes being proposed are of such significance and importance, that any move to extend the proposals to the whole of 14-19 should be undertaken with a great deal of caution. We would advocate allowing the new system for 16 to 19 to bed down properly before embarking on implementing the changes across the whole of 14-19 provision and delivery</p>	
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12 Do you agree with the proposals for capital funding?

Not Sure

<p>Comments: There are few details given in the consultation document on capital funding. We can see why local authorities would want to ensure that capital plans are coherent in developing the kind of infrastructure that is needed to ensure an entitlement to a full curriculum and qualifications. However we are uncertain how plans developed under 'Building Schools for the Future' can be always be consistent with capital development plans in FE colleges which will have to take adult learning considerations into account and are likely to funded through the FE modernisation budgets. We are also unclear how the proposals will be consistent with self-regulating colleges.</p>	
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Chapter 6: Implementation

13 Do these proposals about timescale and transition appear reasonable?

Not Sure

Comments:

The proposals about timescale and transition appear reasonable. Clearly whilst aspects of the changes will require legislation, others could begin sooner. The changes contemplated are extremely far reaching, and will require both starting as soon as possible so as to minimize uncertainty, but also a long enough timescale so that the changes are given proper consideration and not rushed. We are extremely mindful of the lack of capacity of local authorities in regard to strategic planning for 16-19 education and training. We would support putting into place shadow structures where within the current statutory framework, local authorities can begin to take on greater responsibilities for this area of work and to draw together the data and other requirements for drawing up strategic plans and beginning commissioning.

At a national level there will be a need for the greatest clarity on which national agency and organisation is doing what and when, as there will be a time when both 'old' organisations, such as the LSC, and new ones, such as the YPLA, are beginning to operate. There is always a potential for perverse outcomes and as well as confusion and incoherence from the implementation of the proposed changes occurring, UCU would advocate the setting up a consultative forum on which sit both government departments, the various existing and emerging national agencies and bodies sit, as well as representatives of all the stakeholders such as the AoC, ALP, the Local Government Association, the Association of Directors of Children's Services, the new FE Improvement Body and the unions. Such a forum could receive reports on progress on the changes and make appropriate recommendations to facilitate the changes.

It is also critical that the two Government departments concerned with the changes, DCSF and DIUS work very closely together and there is sufficient policy co-ordination at national level, especially in areas where there are issues around young people moving from one system, that dealing with 16 to 19, to the other adult learning system. For example there are many young people who will be using the entitlement to level 3 qualifications up to the age of 25, to complete their studies at this level which were begun before the age of 19. This means their funding will be moving from one system to another. This needs to be done in as seamless a way as possible so as not to disrupt their studies. The other principle area which will require co-ordination and a close working relationship between the two departments as well as the YPLA and the Skills Funding Agency (SFA) will be around apprenticeships

As the sub-regional levels of the new system will be new, UCU supports an early start on work surrounding these. FE colleges will need early indications of the thinking of local authorities around which collaborative groupings make sense at sub-regional level, and how such groupings will operate and make decisions, plan and be managed.

It will be essential that all institutions who will be delivering 16-19 learning programmes within the new arrangements are given their 2009-10 funding allocations in good time to make the necessary arrangements.

UCU is conscious that there will also be uncertainty because the start date

<p>for many of these proposed changes is 2010 and beyond. There will be a general election before the start date of the changes. It would be beneficial if some cross-party agreement could be reached on the changes so as to ensure that all stakeholders do not have to undertake a great deal of work which may not be required.</p>	
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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?

Not Sure

<p>Comments: We do not agree with the proposal to create a new Skills Funding Agency to replace the LSC post-19. We can understand why the government wishes to do this with the 16-19 functions of the LSC transferring to local authorities and the YPLA. However our position is derived from an opposition to the proposed functions and form of the new agency. We will elaborate on this in our response to the next question. We believe that it would have been preferable and entailed less uncertainty and disruption had the LSC continued in a truncated form for the purposes of funding, planning and regulating adult learning.</p>	
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15 Do you agree with the proposed role of the Agency?

Not Sure

<p>Comments: UCU does not consider that the proposed role of the successor body for the LSC is the correct one. We believe that the format – that of a next steps agency is wrong. Paragraphs 7.4 and 7.5 point out the success of the LSC is reshaping the FE system to be coherent and responsive. It states that the LSC has delivered year-on-year improvements in participation and success rates with greater consistency between localities and clearer progression routes. We do not see the rationale for the kind of change that is being proposed. The consultation document states that the new agency will be focused on funding, not planning. We consider this to be wrong. It was attempted before during the first incarnation of the Further Education Funding Council. It did not work then and we see no reason to think it will work now. In some ways the LSC was created to sort out the inconsistencies and incoherence created by the ‘only fund not plan’ policies of the FEFC. The rationales given in the paper for the changes – the aim of a demand-led system and the integration of employment and skills -, do not justify the disruption and potential damage to the infra-structure of adult learning and skills. UCU is profoundly opposed to the marketisation of adult</p>	
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<p>learning and training which we believe is the real justification for the proposed changes. We consider that the model of funding that the new adult learning system is based on – brokerage – leads to unnecessary bureaucracy, duplication and waste. It diverts resources and attention into competitive tendering which would be better used improving teaching and learning. We do not see in the consultation document any sustained argument as to why greater integration of employment and skills requires this particular form of the new organisation.</p> <p>We oppose the creation of the Skills Funding Agency as a next steps agency. We consider this not to be a suitable format for an organisation with such a challenging role as that envisaged for the Agency. Our understanding is that this kind of executive agency structure is suitable when expert advice is not needed and when the emphasis is on implementation of decisions made by Ministers. We do not think this is the position with post-19 education and creating the SFA as this kind of agency will limit the advice available to the government in this area, and may damage the credibility of the new Agency.</p>	
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Chapter 8: Funding and commissioning

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

Not Sure

<p>Comments:</p> <p>We agree that the SFA should take responsibility for funding adult learning that leads to qualifications, funding for Train to Gain and Skills Accounts, and by still funding adult learning programmes that lead to qualifications in colleges and other providers; adult non- and informal learning, learning for adults with learning difficulties and/or disabilities, adult and young offender education. We do not agree the principal form of securing provision should be via commissioning. We would wish to see light touch planning involving all stakeholders and led by the SFA at national and regional levels, and then some form of resource allocation made by the SFA to meet those requirements.</p>	
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17 Do the proposals in this chapter reflect the right balance of strategic commissioning and individual customer choice?

Not Sure

<p>Comments:</p> <p>As we hope we have made it clear in our responses so far, we reject commissioning as the principal means for securing provision. We do support the creation of the new adult advancement and careers service and recognise that in time the new Skills Accounts could become an important way that individuals find support for the learning they seek. However the Skills Accounts are largely untried and very much in the pilot phase. Train to Gain is still in its early days, and we remain to be convinced that it will fulfil the Government's hopes in terms of raising skills levels in the workplace and leveraging commensurate employer funding for training. We believe that much of its work is either 'deadweight', that is what employers were already funding, or merely assessing existing skills in the workplace rather than developing new ones.</p>	
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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?

Not Sure

<p>Comments:</p> <p>Given the new proposed structures, the SFA is the right body to exercise performance management and intervention in the FE system for FE colleges, and in relation to the whole of adult learning. We are aware of the moves towards self-regulation in the sector. We remain to be convinced that the sector is mature enough to undertake these functions. Even if and when it is, we wish to see the Government retains reserve powers of intervention. These will be best held and exercised by the SFA.</p> <p>UCU considers that the proposal for a 'case conference' involving the YPLA and the relevant local authorities to determine the next steps when there are issues around the viability of an individual college, is a sensible one. We welcome the statement that any decision to intervene will be considered in the context of the needs of the local community for a continuing FE service.</p> <p>UCU is pleased that the consultation paper is non-prescriptive in terms of the forms and models of FE that may emerge. We welcome the role of the SFA in maintaining an overview of the evolving institutional pattern</p>	
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19 Have we got the right approach to sponsorship of the FE sector as a whole?

Not Sure

<p>Comments: UCU believes that the approach to FE sector in these proposals is wrong and damaging. FE will find itself strung between the 14/16-19 system and that for adult learning. This will be confusing and unstable. It will create additional bureaucracy for colleges at a time when considerable efforts are going into reducing this burden. FE feels like the after thought in the government's plans despite all the assertions that it is no longer the neglected 'middle sibling' described by the Foster Report. We are particularly concerned about the proposal in the earlier section of the consultation document that sixth form colleges will be separated out from the FE sector and returned to local authority control. We are especially apprehensive about the lack of clear criteria in the consultation as to how this re-designation may occur There is a danger that some institutions might run down their adult learning in order to be designated.</p>	
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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?

Not Sure

<p>Comments:</p>	
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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?

Not Sure

<p>Comments:</p> <p>Whilst agreeing with the description of the wider skills landscape, we would wish to see how there will be mechanisms to co-ordinate the new role for FE in higher education and skills presented by the new powers for FE colleges to award their own qualifications, with the rest of higher education provision.</p>	
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22 Have you any further comments?

<p>Comments:</p> <p>UCU would wish to make a number of general points arising from the proposals in this consultation:</p> <ul style="list-style-type: none"> ➤ In relation to the proposals as a whole, UCU considers that there is insufficient attention given to equality issues. We would advocate a proper equality impact assessment being undertaken and the results of such an exercise being disseminated to stakeholders. For example although there is consideration of and proposals made around young learners with learning difficulties and disabilities and juvenile offenders, there is little on the impact of the changes on other groups such as young women and young people from black and ethnic minority communities. ➤ UCU believes that the new systems must allow other stakeholders, including trade unions, to play significant roles at the various levels. The LSCs, the National Council, now the Regional Councils and previously the local LSCs all had trade union members. We cannot see how inputs from the union movement can be maintained in either the new 16-19 arrangements or those for adult learning under the Skills Funding Agency. We realise that there is trade union membership of the Commission for Employment and Skills and on the Regional Development Agencies. But we are not clear how unions will be able to input into the new sub-regional and regional arrangements being proposed. UCU considers that the level of skills development that the Government clearly and rightly believes is necessary for both economic and social regeneration, will only be forthcoming if it based on more real and meaningful social partnerships than seems to be being proposed for these new structures and systems. The Skills Funding Agency will need to be able engage fully with the trade union movement in the implementation of its policies, if individual and employee choices are going to be part of a truly demand-led system. Current policies would seem to give precedence to employer demands and choices over that of individuals and employees. All need to be taken into consideration if it the new system and its skills development policies are really to be 'demand-led'. We would recommend that trade unions and employers have a higher profile in the governance 	
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<p>arrangements of the Skills Funding Agency.</p> <ul style="list-style-type: none">➤ The consultation paper makes a small reference to the establishment of further Employment and Skills Boards, and that the London Board is a good model. We would endorse this view and urge that there is swift progress in establishing these new Boards. This would not only be a creating a place within the new system where employers and trade unions could be part of the new system's governance arrangements, but if the London example is followed, would go some way to filling the democratic deficit that exists in FE system➤ Despite the proposals around transition to the new systems, UCU remains concerned that new arrangements may become so complex and bureaucratic that this may undermine the central thrust of the Government's policies.	
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Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply

Here at the Department for Children Schools and Families we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

X Yes

No

All UK national public consultations are required to conform to the following standards:

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
3. Ensure that your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process influenced the policy.
5. Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

Further information on the Code of Practice can be accessed through the Cabinet Office Website:

<http://www.cabinetoffice.gov.uk/regulation/consultation-guidance/content/introduction/index.asp>

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 9 June 2008

Send by post to: Consultation Unit
Area 1A
Castle View House
East Lane
Runcorn
Cheshire
WA7 2GJ

Send by e-mail to:

Raisingexpectations.ENABLINGTHESYSTEM@dcsf.gsi.gov.uk