

UCU response to DfE consultation: 'Skills for jobs: implementing a new further education funding and accountability system'

(21 September 2022)

The University and College Union (UCU) represents over 120,000 university, further and adult education lecturers, together with related staff. UCU welcomes the opportunity to contribute to the consultation, 'Skills for jobs: implementing a new further education funding and accountability system'.

In summary, UCU's concerns about the funding and accountability consultation centres around the fact that its focus is on funding and quantifying the effectiveness of FE and adult education through skills education that leads to jobs. There is no recognition of the other positive outcomes arising from education, such as improving health and well-being, and the contribution to society and communities. We would welcome a development of the funding accountability indicators to factor in the wider positive outcomes of education.

Preliminary

1. This response should be read alongside, and as being in support of, the TUC response to the consultation, which we fed into.
2. We are concerned that no specific impact assessment has been prepared to accompany the consultation, which indicates that the DfE may have overlooked the impact of this consultation on some of its stakeholders. We request that an impact assessment be carried out on the shift in policy from the existing one contained in 'New Challenges, New Chances: Further Education and Skills System Reform Plan,' to that proposed in this consultation. We particularly request that an equality assessment be carried out on the impact of this change.
3. We are also concerned about the timing of this consultation, which was not conducive to maximum engagement with our members. Further, the Department's webinar, supporting stakeholders, was not delivered until two weeks before the deadline. We appreciate that the deadline has been extended by three weeks; however, the extension was not announced until 16 September 2022, which was two working days before the original deadline, meaning that many of us had already tailored our preparation for the response to the original, tighter deadline. Had the extended deadline of 12 October 2022 been set from the outset, we (and no doubt

other stakeholders) would have been able to plan ahead and schedule in more time to respond to the consultation.

4. Going forward, we would welcome the opportunity of working collaboratively with the Department, to provide input and feedback in relation to policy, policy changes and consultations prior to their announcement or publication.

Equipping adults with skills that would lead to employment

5. Part of the focus of this consultation is equipping adults with skills that will lead to employment. UCU agrees that part of the role of the education system is to equip adults with skills that will lead to employment. However, equipping adults with skills that will lead to employment is not the only role of the education system in the lives of adults – and that is not recognised in this funding and accountability consultation. UCU would like the additional benefits of education on the lives of adults explicitly acknowledged in funding and accountability policy and additional related policy work.
6. The focus on practical skills in the consultation is to the exclusion of, or predominantly to the exclusion of the benefits discussed in the Select Committee report, 'A plan for an adult skills and lifelong learning revolution' (16 December 2020).
7. Many different sources of evidence have highlighted the benefits we would like to see in the DfE's funding and accountability policy work. For example, the Select Committee paper found that the benefits of Adult Skills and Lifelong Learning (ASALL) 'extend far wider than productivity and skills development'. The report recognises that beyond the clear economic benefits, there is 'good evidence of wider benefits of adult skills and lifelong learning', which include health, employment, social life and community.¹
8. In relation to the health and wellbeing benefits, the Select Committee report cites research by the former Department for Business, Innovation and Skills (BIS) in 2012, which found that adult learning for older adults, aged 50-69, is associated with higher wellbeing. The Select Committee report also cites another BIS research report (also of 2012), which found that participation in formal learning courses is associated with a reduction in the number of GP visits. Another piece of research the Select Committee report identifies is by Feinstein and Hammond (2004), who found that participating in lifelong learning can result in an increase in the probability of giving up smoking and taking part in exercise. The Select Committee paper concludes that 'adult learning has its greatest impacts in the domain of health and mental health'.²
9. In terms of benefits for society and communities, the Select Committee paper cites research commissioned by the Department for Education in 2019, 'The wider (non-

market) benefits of post 18 education for individuals and society: Research Report'.³ The research found that post-18 education increases civil participation across outcomes such as likelihood of voting and political engagement. The Select Committee paper, further, cites research by the Workers' Educational Association (WEA), who surveyed 5,000 of their learners and found that adult learning can contribute to stronger communities. It defines stronger communities through various indicators, such as the level of belonging and inclusion reported by adults, civic participation and the likelihood of giving up time for community projects and volunteering.

10. Additionally, the focus on practical skills for jobs in the consultation is to the exclusion of, or predominantly to the exclusion of, a focus on nurturing cognitive skills - to equip students to develop intellectual skills to contribute to their local and global community, to engage in critical thinking, build personal competency and resilience, enhance their social skills and enable them to become socially mobile. We would like the funding and accountability policy to explicitly acknowledge and value the impact education has on developing cognitive skills.
11. Further, there is no specific mention in the consultation of the vital role of ESOL education to the lives of individuals and communities.
12. We are concerned by the narrow framework of funding and accountability being adopted by the DfE in relation to FE and adult education policy. A policy which focuses exclusively on skills that lead to employment, is rolling back more progressive existing education policy. The existing Community Learning policy is contained in the 'New Challenges, New Chances: Further Education and Skills System Reform Plan' (2011). That policy's objectives include to improve confidence; better equip parents/carers to support their children's learning; improve/maintain health or social well-being; increase volunteering, civic engagement and social integration; reduce costs of welfare, health and anti-social behaviour; turning around the lives of our most troubled families; and bringing people together from all backgrounds. The proposed policy in the consultation replaces these existing, wider educational objectives in favour of a more narrow, skills for jobs approach.
13. We are concerned about the voice of educators being drowned out in education policy, in favour of the voice of employers. We embrace a multi-disciplinary approach to education policy, where there is a role for the voice of employers alongside educators and other stakeholders. However, in this consultation, where 'employer' is mentioned 64 times compared to 'teacher' only four times, it points to the conclusion that government does not value the voice of educators and employers equally in education policy. Notably, those four times that 'teacher' is mentioned is in relation to building teacher skills, rather than to take into account their expertise as educators.

14. Government is seeking to focus funding on provision which would deliver the 'greatest benefits to individuals, employers, the economy and society more widely' (para. 20); however, Government has to be cognisant of the fact that their current trajectory, largely focused on mechanical/autonomous/digital skills-based education for jobs, may achieve an unintended outcome. These unintended outcomes may include deepening socio-economic inequality in education: university only for those who can afford it and a skills-based education for those who cannot.

15. Below is some of the feedback received from members:

'Providers should not be forced into narrowing down the curriculum to address local skills issues. Where skills shortages are a factor, there should be scope to address national skills shortages, otherwise local communities are being denied the opportunities to find employment elsewhere' [UCU member]

'The overall level of funding into FE needs to increase – see the recommendation from the Select Committee paper. I question whether investing £290m to create 21 Institutes of Technology (IoTs) across England is the best use of funds or the way to increase technological skills; we already have good provision in FE – the money would be better invested on developing what's already in the FE sector' [UCU member]

Accountability

16. UCU understands the need for accountability within the system. However, the accountability measure that the consultation applies, of moving from skills to jobs (or towards jobs from skills), is very narrow. Other papers, such as the 2019 DfE paper mentioned above ('The wider (non-market) benefits of post 18 education for individuals and society: Research Report') and the WEA survey, also mentioned above, found a way of measuring wider educational outcomes, including the likelihood of voting and political engagement, the level of belonging and inclusion, civic participation and the likelihood of giving up time for community projects and volunteering.

17. Some learners may be 'a few steps away' from the economy and will require education in increments before entering the workplace – or may even be a few educational steps away from education that may eventually lead them to the workplace. These are the most vulnerable in society, who may have already experienced challenges in their childhood education and as adults, are further marginalised by this proposed policy which overlooks their needs. Greater consideration could be given to potential unintended equality impact of the proposed policy, which can be achieved through an equality impact assessment.

18. We are concerned that the consultation applies only business principles to education. For example, the consultation talks about 'provisions that delivers the

most value to the learner and the economy', which links what is of value to the economy as being of value to learners. There is no consideration in the consultation of pedagogical evidence or the distinct role of education in the lives of individuals and society, beyond the economy. The economy, while important, is only one part of society to be considered in education policy. Diverse educational knowledge and skills are required for resilient individuals and communities (including the economy); it is important to remember that the effectiveness of these diverse educational objectives cannot be measured by the same, singular indicator i.e. by skills education leading to jobs.

19. As such, the consultation is singularly 'industrial' in its approach and does not take sufficient account of the established research into the benefits of a diverse education to individuals and communities.
20. If this skills-for-jobs accountability policy leads to greater bureaucracy and funding conditionality for providers, it will increase the burden on staff/our members who are already overworked (the equivalent of an additional two-days unpaid each week⁴) and underpaid (on average approx. £9,000 per year lower than their schoolteacher counterparts⁵). The consequences of working under those conditions include issues of attracting and retaining staff in the sector. The sector has no capacity for increased burdens following the cuts of the last decade or so.

Miscellaneous

21. We would welcome clarification on the meaning of para. 61 i.e.: '[We expect this will incentivise a focus on individuals progressing in their learning] and encourage a reduction in the extent of multiple enrolments at the same level'. It is unclear whether a learner will be entitled to enrol on fewer courses in the same year, or if a learner fails, the chance to retake will not be given (or something else). These are important questions for adult learners.
22. In relation to the dashboard, we believe it is important that it is not used as a punishment tool to 'name and shame' providers.

Conclusion

We are disappointed by the Department's narrow, singular approach to valuing education, in that it uses skills for jobs as the measure of its effectiveness rather than that being one indicator, alongside others, including the contribution of education to civic society and people's health and welfare.

Research, as mentioned above – including research carried out by the DfE itself in the past, has shown that it is possible to quantify the effectiveness of educational outcomes beyond skills for jobs.

We would like to see the Department re-considering this central tenet of the consultation and re-introduce wider educational outcomes into the funding/accountability matrix.

We reiterate that we would welcome the opportunity to work collaboratively with the Department, to provide input and feedback on consultations prior to their announcement publication. If we can be of any further assistance, please do not hesitate to contact us.

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