



fforwm response to
*Delivering Skills That Work for Wales: A
New Approach to Adult Community
Learning*

fforwm 
DROS GOLEGAU CYMRU • FOR COLLEGES IN WALES

December 2008

fforwm response to *Delivering Skills That Work for Wales: A New Approach to Adult Community Learning*

1. fforwm welcomes the opportunity to respond to the Welsh Assembly Government's (WAG) consultation document: *Delivering Skills That Work for Wales: A New Approach to Adult Community Learning*.
2. fforwm is the national organisation representing the 23 further education (FE) colleges and two FE institutions in Wales¹. It is an educational charity and a company limited by guarantee. fforwm's Board comprises college principals and chairs of corporations, appointed by member colleges. fforwm provides a range of services to its members including networks, conferences, research, consultancy and the sharing of good practice. It also works closely with a wide range of partners in post-16 education and training. Through fforwm, colleges are represented on various committees, working parties and other groups influencing and shaping policy in post-16 education and life-long learning.

Some general points

3. While there is much in the consultation document to be welcomed, there is major concern at the differences in approach being taken between that set out in the consultation document and WAG Transformation proposals². In the former, the structure and membership of the Learning Partnerships are prescribed; in the latter, new Learning Partnerships are invited to be established with the aim of coming forward with ideas on transforming the delivery of education and training post-14 and post-16 in their areas.
4. fforwm would wish to see the Transformation/Adult Community Learning (ACL) reforms brought much closer together. Learning Partnerships should be invited to come forward with proposals for transforming education and training and these should be extended to include ACL and with similar timetables.
5. It would also be sensible if the consultation document could be more closely linked with the Department for Children, Education, Lifelong Learning and Skills (DCELLS) consultation on its fees policy due to start in Spring 2009. The outcomes of the fees review will have a considerable impact on the future funding and planning of ACL and it is curious that the consultation document has been published separately.

¹ In this response, the terms further education institution (FEI) and FE colleges are used interchangeably to describe all of fforwm's members.

² *Transforming Education and Training Provision in Wales: Delivering Skills That Work for Wales*. Welsh Assembly Government, September 2008

6. The fees review is expected to address who should pay for what and the proportion of fees to be borne by WAG, the employer and the individual. If the recommendation is that the contribution from individual learners in funding ACL should be increased for certain ACL courses, a number of serious considerations need to be taken into account. These include the balance between learners who can pay and those who cannot in terms of running viable classes. If the viability of courses is premised on receiving a percentage of fee income, then provision in the poorer areas of Wales will be threatened with an inevitable impact on the WAG's widening access agenda. It is likely that in the current economic climate employers may become reluctant to make a higher contribution to fees. The DCELLS fees policy must therefore be seen as a key part of the transformation and ACL reforms.
7. The consultation document lacks a clear vision for ACL in Wales. The success factors listed in the section on main policy themes (p9, para 10) seem to be more process oriented than outcome focused. Does WAG see ACL as expanding and developing in line with the vision for Wales as a Learning Country? Are there ambitious targets for the number of ACL learners? What part does, and should, ACL play in contributing to the economic and social welfare of Wales? What about the future contribution of ACL to personal well-being and fulfilment?
8. The consultation document was conceived and developed before the extent of the current economic downturn was realised. The post-consultation document will need to reflect on the important contribution ACL can make to supporting people who have been made redundant or are at risk of losing their jobs. ACL can help boost people's confidence by encouraging them to take courses often in informal settings with the aim of developing their skills and enabling them to transfer to mainstream training and other educational programmes to change the direction of their careers.
9. The consultation document (Introduction, p8, para 8) states that there are 67,675 enrolments in ACL. *Transforming Education and Training Provision in Wales*³ shows that 57.4% of these are enrolled at FE institutions. Interestingly, of all those enrolled at FE colleges or FE institutions, only 15 students (0.02%) are full-time. Curiously, neither document provides figures for ACL expenditure in Wales. This is particularly surprising in the consultation document as one of its key tenets is that learning partnerships should have responsibility for planning and funding.

³ *Transforming Education and Training*, op.cit, Annex A, p23 gives the number of learners on LEA community learning provision but no figures for ACL expenditure. It gives expenditure for 16-19 delivered in schools, the FE expenditure and that of HE institutions but not for work-based learning (although other publications show this to be around £120m) or for ACL.

10. fforwm has been informed that the overall budget for ACL is estimated as being between £12 - £15m. This compares with the £500m of public funding (over £1bn if higher education is included) allocated to the institutions covered by the Transformation agenda. Put in this context, the recommendations set out in the consultation document appear to be overly complex.
11. There needs to be more accurate analysis of ACL expenditure, broken down by type of learner, mode of attendance and type of provision. A clearer picture should be provided showing how much funding each ACL partnership might be responsible for. Assuming the £12m-£15m figure the average amount could range between £1.1m - £1.7m.
12. There also needs to be an effective on-line service for potential students seeking to identifying appropriate ACL courses in their area to supplement locally published information. Learn direct careers Wales on-line service needs to be reviewed to ensure it retains up-to-date information on the local availability of courses.
13. The 'lead banker' role referred to in the consultation document would need to be carried out by a statutory public body well used to dealing with the receipt of public funds. It should always therefore be the local authority or the FE college. Guidance would need to be given on the role and remit of the 'lead banker' and the appropriate internal and external audit requirements, particularly important if the 'banker' were also a provider bidding for funds.
14. Finally, the development of ACL provision must be seen in the context of the growing adult population in Wales and the likely increasing demands on education from those in work, those seeking work and those wishing to boost their confidence.

Q1 Do you agree with our proposed definition of adult community learning for the policy?

15. Because there are several definitions of ACL (see examples in consultation document p13, Section 1, para 2), having a single agreed definition would be useful. ACL is often not clearly understood by decision-makers and members of the public.
16. The definition in para 4 Section 1 – *'learning provision for adults aged 19+ which is offered in local community settings and which is not occupation-specific in nature'* - is useful but there are two key reservations.

17. First, the term 'not occupation-specific' needs to be clarified. It is assumed that this does not rule out vocational courses. As currently written, the definition could be interpreted as excluding the current successful spread of vocational courses in ACL to learners who are unlikely to enrol on vocational courses in a traditional setting. Through enrolling on ACL vocational courses, learners have access to qualifications they would often not have had the opportunity to study. These include provision for classroom assistants, hair and beauty therapy, counselling, alternative therapy, reflexology, coaching or exercise qualifications. There is concern about potential loss of some specialist and successful level 3 provision including youth work, community work, sports coaching and access for learners. These are successful destinations for adults returning to learning. They enable adults to re-skill or up-skill and give the confidence to play a more active part in employment or voluntary work. This provision is likely to become increasingly important as the economic recession leads to job losses and people will have to redirect their careers.
18. Secondly, we would disagree that ACL begins post-19. There is no explanation for this shift from post-16 to post-19 in the document and fforwm believes that ACL should remain post-16. The numbers of 16-19 year olds in ACL are currently small. Around 3% of current community learning enrolments (1,605 learners in 2005/06) are aged 18 and below. However this is not a reason to exclude them. We also feel that ACL has an important contribution to make to tackling the serious problem of those not in education, employment or training (NEETs) in Wales.
19. fforwm supports the six purposes for learning identified in para 3 of Section 1, identified by the National Institute of Adult Continuing Education (NIACE) i.e. skills for life and embedded basic skills; skills for independent learning; skills for work; first steps learning; personal development and well being; learning for active citizenship and/or community development; first steps. These usefully set out the key purposes of ACL and should form the planning the ACL curriculum.

Q2 Is the Adult Community Learning Partnership the best model for planning and funding Adult Community Learning?

20. fforwm supports the idea of partnerships to help plan and fund ACL. However the model of partnerships set out in the ACL Review is not the best way forward. As stated in para 4 above, fforwm would prefer the reforms in ACL to be carried forward under the banner of the Transformation agenda in which partnerships are formed that reflect local circumstances.

21. As noted in section 2, para 9 of the consultation document, the groupings were put forward in the Review on FE, chaired by Sir Adrian Webb⁴. However, para 7.16 of his report stated that the suggested consortia were a 'possible configuration' and in public meetings Sir Adrian was at pains to point out that these groupings needed to be the subject of discussion. In addition, the 14-19 commissioning consortia were not put forward as models for partnerships in respect of ACL.
22. The WAG Transformation document, (para 8) stated clearly that:
- 'We are not convinced that any one specific collaboration or reconfiguration model can deliver the transformation of post-16 education and training provision. Consequently the commissioning consortia proposal put forward in the Webb Review is not a model which we wish universally to prescribe'.⁵*
23. It is likely that Learning Partnerships being established under the Transformation agenda will differ considerably from those proposed in the consultation document. It makes eminent sense for the ACL and Transformation agendas to be harmonised.
24. The ACL partnerships also do not reflect the national status of at least three key organisations – Coleg Harlech/WEAN; WEA South and YMCA Community College. It would be incredibly time consuming and overly bureaucratic if the managers and staff of each of these organisations were required to attend meetings in ACL partnerships at local level. It would make much more sense for their national contribution to be recognised under new ACL arrangements and that discussions with these organisations should be held to identify their contributions. fforwm accepts, however, the main thrust that ACL partnerships and the transformation partnerships should normally be local.
25. fforwm recognises that partnerships, when working effectively, encourage providers to collaborate; co-ordinate the local learning offer; facilitate development and improvement; and make strategic connections. Learners, communities and individual partners benefit where providers work together successfully. The proposed ACL partnerships should not be additional to the other partnerships that are emerging. The risk is that a complex edifice could be constructed to plan and fund what is in effect a relatively small sector. As noted in para 10 above, its budget of between £12 - £15m is around 2.4% - 3% of the budget for post-16 provision outside higher education.

⁴ *Promise and Performance: The Report of the Independent Review of the Mission and Purpose of FE in Wales in the Context of the Learning Country: Vision into Action*. Chaired by Sir Adrian Webb, WAG, December 2007, Figure 8, p70.

⁵ *Transforming Education and Training*, op.cit. para 8, p2.

26. Lessons should be learnt from the experience of Community Consortia for Education and Training (CCETs), geographical pathfinder projects and the introduction of Welsh for Adults' centres. The now defunct CCETs shared some similarities with the proposed ACL partnerships as they involved a number of institutions providing education and training for 16-19 year olds. Whereas partnerships may feel comfortable in discussing broad plans for educational provision in their areas, relationships could become more difficult when firm decisions would need to be made about purchasing ACL provision from specific institutions.
27. There would need to be clear guidelines laid down and codes of conduct and registers of interests developed to make sure that public funds were used openly, transparently and honestly. Rules and protocols would be needed to cover arrangements for commissioning bids, deciding on which bids were acceptable and handling appeals for unsuccessful bidders. The development of a best practice framework by WAG would need to provide guidance on governance and the distribution of funding within partnerships.
28. One of the key aims of the proposed partnerships is to support greater coherence in the deployment of DCELLS' funding. It is not clear why the DCELLS' funding for adult community learning delivered by higher education (HE) institutions is excluded from the remit of the proposed partnerships. The partnerships should plan and fund all DCELLS' funded ACL provision.
29. The consultation document states (para 16 of Section 2) that the model of ACL partnerships will continue to be '*reviewed within the context of any wider reconfiguration of education and training arising from WAG's transformation agenda*'. However, as noted above, the consultation document does sit comfortably with the Transformation agenda.
30. ACL partnerships need to be developed as an integral and considered part of wider developments in post-16 education and training. Significant benefits are to be gained by the formation of ACL partnerships but there is a risk that a proliferation of various partnerships could lead to an increase in bureaucracy. For example, certain FE institutions may be required to be members of various partnerships including 14-19 networks, ACL partnerships, work-based learning partnerships, local service boards and spatial plan areas.

Q3 Do you agree with the proposed number and location of Adult Community Learning Partnerships?

31. Please see our response to the question above.
32. The rationale underpinning the suggested configuration is not clear. The proposed partnerships are at odds with existing partnerships that work well. For example, there is no explanation as to why the Heads of the Valleys area is split across two partnerships, when the WAG is encouraging a single coherent approach to the regeneration of the region.

33. The prescriptive approach for ACL appears to be at variance with that adopted by WAG for other areas of education through the transformation agenda.
34. To reiterate fforwm's position, ACL should be an integral part of the broader transformation process, from which all new post-16 partnerships should be developed.

Q4. How can the proposed Adult Community Learning Partnerships work most effectively with existing partnerships and planning arrangements?

35. As noted above, ACL partnerships should be an integral part of the post-16 learning infrastructure and the transformation agenda, with adequately broad membership and clearly articulated relationships with other partnerships.
36. There are important benefits in working in partnership including building on current good practice. However more information is required on:
 - funding of partnerships, including clarity on governance, the role of 'lead organisation' or 'banker', and the proposed distribution of funding across geographical areas
 - quality assurance – currently, many providers have different quality assurance systems, although there are some examples of excellent practice and joint working
 - the role of higher education - many partnerships currently work with HE institutions and are keen to ensure learners have access to suitable progression routes. However there are differing funding, inspection and quality assurance models in place which act against closer partnerships. And, as noted above (para 28), current proposals do not encourage the inclusion of HE, despite it being funded to deliver significant amount of ACL.
37. Working together effectively requires clear terms of reference and adequate funding. As a minimum, resources need to be invested to assist partnerships in their planning. WAG should also consider supporting the development of technology to assist effective communication, planning and sharing of resources within and between partnerships, through for example the use of online resources such as Moodle and common timetabling software.

Q5 Do you agree with the aim of increasing flexibility to support informal learning through the Grant Scheme?

38. fforwm accepts the view that each partnership should have responsibility for a new informal grant scheme and recurrent funding through the national planning and funding system (NPFS).
39. There is a risk however that having two separate funding mechanisms covering such a relatively small budget of perhaps £15m will lead to a disproportionate level of administration and bureaucracy for providers and the WAG. Investment in ACL needs to be long term and strategic. This would help prevent the current scenario when in times of economic stringency, ACL is among the first budgets to be cut.
40. If this risk cannot be ameliorated, an alternative approach may be to simplify and amend the NPFS, and relax the rules underpinning it so that it could better apply to all forms of ACL, including formal and informal provision.
41. Informal learning is by its nature more expensive to deliver than formal learning. There is a cost in encouraging learners to enrol, and often class sizes are smaller than mainstream education and thus less viable. If the funds for this new investment in informal learning are provided in addition to current ACL funding, the necessary changes may be achieved without negative impact on the overall budgets and viability of provision. If however, funds are to be diverted to informal learning from current budgets, there will inevitably be a negative impact on the current demands for adult learning.
42. The shift in emphasis needs to be phased over a period within which the demand for informal learning can be accurately assessed against the demand for formal learning and plans formulated to meet the needs as effectively as possible. These changes are taking place against the background of many providers struggling to meet the current demand for adult learning exacerbated by the shift of resources towards 14-19 provision. This is set in the context of demographic decline in young learners and an increase in the adult population, an extended period of employment and an increasing demand for life enhancing learning for the more isolated older learners. The emphasis on Basic Skills and English for Speakers of Other Languages (ESOL) is welcomed but this provision has traditionally been provided free as an entitlement. An increase in this provision as a percentage of the total provision also impacts on increased costs for providers. The funding needs to reflect the reality of adult learning and the relative costs of the provision.

Q6 Do you agree with the criteria outlined in paragraph 2 Section 3 for which learners will be funded through Adult Community Learning?

43. We agree that limited public funding should focus on the groups listed in Section 3, para 2 as a priority. These are learners which meet the following criteria:

- *representative of under-represented groups, including both geographical communities and communities of interest*
- *undertaking provision which may enable progression into further learning activities or employment, whether paid or involving volunteering*
- *undertaking provision which offers demonstrable wider benefits for individuals or communities, such as social inclusion or improved health and wellbeing.*

44. As noted above, fforwm supports the criteria being widened to include learners aged 16-19. There should also be recognition of the wider benefits of ACL on social inclusion, health and welfare, physical and mental well-being etc. There is increasing evidence that taking part in adult education and learning activities are associated positively with improving health. The significant value of family or cross generational learning should not be lost as attitudes and commitment to learning are transformed for whole families. The emphasis within ACL on skills for employability and/or basic/key skills and Welsh should be built into programmes to make them more directly relevant to learners' needs and allow progression to occur more naturally. There is also recognition of the opportunities that the development of the credit framework under the Qualifications and Curriculum Framework (QCF) provides to adult learners.

45. The economic downturn and the increasing number of people likely to become unemployed or worried about their future employability are likely to see an increase in demand from these learners. It is suggested that a fourth category is added to the three listed in Section 3, para 2 – *'those recently made redundant and looking to move back into employment who are not eligible for other forms of funding'*. These people may particularly be lacking confidence and seeking to move into new areas. This will be of great assistance when, as is expected, the economy begins to pick up. This will of course have implications for the overall ACL budget if demand is greater than predicted.

46. Any change in funding eligibility criteria needs to be phased in after public consultation. Appropriate arrangements should continue to be made for those younger learners who access community provision, many of whom are NEET. This needs to sit with the WAG policy on NEETs.

47. We recognise that WAG will be consulting on its fees policy in the early part of 2009. As stated elsewhere in this response, this should have been carried out at the same time as the ACL consultation as both are closely linked. There needs to be an appropriate balance in contributions between the individual, WAG and the employer as to who pays for ACL. It is right that, for some courses where the student can afford to pay, and the course is predominantly to allow the student to pursue their own interests, the student should bear the cost. In other cases, such as courses for disadvantaged adults seeking to improve poor levels of basic skills, it is right that WAG should pay the fees. Employers will be expected to pay where the training is of benefit to a specific business although many companies may be cutting back on training in the light of economic circumstances. On other occasions, all three may contribute a proportion.
48. If adults' fee contribution is increased for some categories (i.e. those who can afford to pay), a sustained campaign will be needed to encourage those adults to increase their investment in learning. If the proposed criteria are introduced prematurely, it may reduce fee income as fewer paying adults attend ACL provision. Lessons need to be learnt from the mistakes in England where there has been a drop of 1.4 million adults participating in publicly funded learning over the last two years. As a result, many courses have become unviable and opportunities have been reduced for all learners.
49. It should also be noted that an increased emphasis on under-represented groups is likely to increase the average cost per learner. This is reflected in the WAG's approach to funding post-16 learning, which includes a 'deprivation uplift' to recognise the increased costs of widening participation. However, neither the cost implications of improving equality of opportunity, nor the need for pump-priming investment to effect change, are acknowledged within the consultation document. Widening participation when budgets are restricted may lead to an overall reduction in the number of participants within ACL.

Q7 Do you agree with the priorities that Adult Community Learning should seek to address outlined in paragraph 6 Section 3?

50. fforwm broadly accepts the priorities listed in para 6 of the ACL consultation document, albeit with some reservation. The priorities are:
- *provision at or below level 2 and which also meets one or more of the following priorities*
 - *opportunities for widening participation amongst disadvantaged or under-represented groups*
 - *basic skills and English for Speakers of Other Languages (ESOL)*
 - *developmental training to enable progression into employment or further training but which is not covered by our main vocational programmes.*

51. There is a contradiction between provision at or below level 2 and Access to HE which is primarily at level 3 and which is defined as a 'signature' qualification (para 7 of Section 3). Other level 3 provision is available which is of particular relevance to adult learners and local economies. Under the QCF, adults will have the opportunity to select units that develop their skills and/or understanding but under mutual recognition might also form part of a qualification including Access. The credit framework offers adults the capacity to choose their own programme of study and use this as a real and achievable route into qualifications and into mainstream provision. There also needs to be some recognition of the different needs and priorities in different areas and how best these might be met - this might include specific local needs particularly where partners work effectively on projects such as re-engaging younger learners through ACL. Consideration needs to be given to funding to support the implementation of the Credit and Qualifications Framework in Wales (CQFW).
52. A focus on provision below level 2 is sensible. In spite of the heavy investment in basic skills over the years, the proportion of those below level 1 in literacy and numeracy in Wales shows little evidence of falling. Indeed, when compared to the other nations in the UK, Wales retains its unenviable record of having among the lowest levels of numeracy and literacy,
53. Some of the resources allocated for basic skills need to be invested in ACL. While fforwm recognises the importance of focusing on literacy and numeracy in schools, around 70% of the 2020 workforce is already in the employment market⁶ and their needs must be met. The ACL budget should reflect the increase in demand for ESOL. Such an increase would reflect the contribution made by migrants to Wales' economy and society; and demonstrate the WAG's commitment to supporting asylum seekers. We also note that a conservative estimate of the costs of addressing the current adult basic skills deficits in Wales is in the region of £500m, compared to an annual ACL budget in the region of £5m.
54. Broad priorities should be set by WAG within which local providers have the flexibility to meet local need. For example, widening participation amongst disadvantaged or under-represented groups is a WAG priority. In pursuit of this priority, and subject to regulations setting out the effective use of public money, providers should have discretion to offer a range of learning opportunities which best meet local circumstances. WAG should monitor the performance of partnerships against meaningful outcomes which correspond to the broad policy priorities.

⁶ *Skills That Work for Wales. A Skills and Employment Strategy and Action Plan.* WAG, July 2008, para 7.03, Section 7, p53.

Q 8 Are there specific groups of learners, not mentioned, which the policy should take into account?

55. NIACE has produced significant research showing that school accounts for only about 25% of a child's performance, with the other 75% attributable to other factors, especially parental income, education and involvement. Other studies have showed how negative attitudes towards education are passed from one generation to another and that children with the poorest basic skills are the most likely to have parents who had left school without any qualifications or with negative attitudes to education. Investing in raising the educational performance of children must be accompanied by programmes aimed at parents, carers, grandparents and others.
56. Older people also need to be targeted. Recent statistics have shown that for the first time there are more people aged over 60 than young people up to the age of 16. WAG should take a close look at its policies with respect to the growing numbers of older people. Engagement in learning later in life contributes towards physical and mental health and well being, reduces social exclusion and its negative consequences, and improves self confidence.
57. Currently, learning programmes for older people involve the statutory sector and voluntary organisations covering a wide range of provision and with varied quality. ACL Partnerships have an important role in avoiding duplication of provision and ensuring standards are high.

Q9 What is the best way of creating more synergy between different strands of support for Adult Community Learning?

58. fforwm looks forward to the publication, due in January 2009, of NIACE's review of WAG's policies and strategies across departments to identify synergies in relation to adult education and training.
59. ACL should be seen as part of the wider integrated approach to education and training being proposed by the WAG rather than something that occupies the margins. Because of the diversity of ACL, it is important that a one size fits all approach is not adopted. However, partners need to be aware of all support available within an area to enable partners to create links between the different elements and work towards a common approach.
60. The post-consultation document needs to address the costs associated with maintaining and expanding existing partnerships. There are already problems regarding the sustainability of this infrastructure as most funding sources are focused on the delivery of specific project outcomes. As stated earlier, the transfer of funds away from delivery to sustain the partnership infrastructure is difficult to support given that funds for ACL are already diminished. The environment is further de-stabilised by the loss of European funding that has previously sustained partnerships.

61. The need to make better use of existing resources for support in ACL on the ground is acknowledged but there is also a need to make better connections at a strategic level between different departments in the WAG. Because of its community focus, ACL bridges a number of policy initiatives across departments such as social justice, regeneration, health and economic development. Economic inactivity is one example where initiatives emanate from different departments in the WAG. ACL has a major contribution to make to this agenda and a clear and co-ordinated strategy from the WAG would give providers a framework that would enable them to work together to make the best use of resources.

Q10 Do you agree with the need for a more consistent approach to the measurement of progress and achievement in informal learning?

62. fforwm accepts that there should be a more consistent approach to the measurement of progress and achievement in informal learning. The assessment of progress and achievement in informal learning needs to fit closely with the Quality and Effectiveness Framework for post-16 learning. It is reasonable to expect that ACL learners should have the same expectation of high standards of service as any other learners in more mainstream publicly funded provision. The measurement of success should also be broadly the same.
63. The implementation of the QCF will provide a common framework that could form the basis of planning and quality assuring informal learning. The recent development of Recognition and Recording of Progress and Achievement (RARPA) and the effective use of OCN units to create bespoke programmes, establish a strong basis for the measurement of progress, distance travelled and achievement in informal learning. The challenge for the partnerships will be to establish a consistent approach across providers with different experiences and skills in measuring quality.
64. fforwm supports the opportunity for ACL learners to use credit accumulation to recognise their individual achievement and progression and generally supports the integration of ACL learning within the CQFW.
65. We believe that providers should meet the five stages for RARPA, set out in para 9 of section 4 of the consultation document.
66. Not all organisations are able to disaggregate their formal/informal and accredited/non-accredited provision. The introduction of the informal grant scheme will make an additional call on already diminishing funding but it also runs the risk of setting up a false divide between NPFS-funded provision and that funded through the informal grant scheme.

67. In order for ACL to operate effectively, fforwm supports the need for the two WEAs in Wales to promote a framework based on the strategic lead being taken at a national level where local partnerships provide local accountability and delivery. Both WEAs play a central role in operating such a model. To break this framework across funding lines and geographical boundaries would be a loss to the sector as a whole. We support the evidence to the consultation document from the WEAs which states that:

“...in North Wales the partnership based around Coleg Harlech WEA(N) European funded projects has provided the infrastructure, additional funding and support that has enabled FE providers to continue to offer ACL. Without this partnership much of this provision would have been under threat. In South Wales, the WEA has been a catalyst in the development of the Regional Learning Partnerships in South West and South East Wales, bringing a Wales and UK-wide perspective to inform the discussions on governance and strategic planning”.

Q11 Are these the right actions for improving quality in Adult Community Learning? Should we include any others?

68. fforwm would support a more coherent approach to continuing professional development (CPD). There needs to be recognition of the demands on, and needs of, the largely part-time teaching staff, securing for them appropriate CPD and involvement in quality assurance through self-assessment, course reviews, internal verification and RARPA.
69. We agree that much CDP for ACL teachers is ad hoc and unaccredited. This patchy approach to CDP has an impact on standards as staff are unable to receive regular updates and learn about advances in teaching and learning methods. It is ironic that staff who are emphasising the importance of learning to their students can themselves be deprived of the opportunity for CDP to help them improve their own performance.
70. The development of CPD for ACL should be linked with the Professional and National Occupational Standards developed by LLUK to ensure that the development of future provision is based around a recognised standard for ACL.
71. Increased investment will need to be put in place to sustain the provision, training and employment of skilled and experienced staff in order that they can, in turn, support ACL learners.

Q12 Are there any particular areas where links with Adult Community Learning should be developed?

72. fforwm welcomes the statement that ACL policy should reflect the aim of *Making the Connections* to ensure that public services work in a more joined up way to deliver services. We also recognise that ACL should have strong links with other WAG strategies and initiatives.
73. It is important that ACL is not isolated from the wider education, health and economic agendas and links should be created to the 14-19 networks to ensure appropriate all-age learning.
74. One of the key aims of the new partnership arrangements is to encourage/support progression into further learning and, for that to happen effectively, links need to be established with the receiving providers. Links between the tutors to introduce the students to their destination course can improve retention.

Summary

75. There is much to be welcomed in the consultation document and fforwm supports the need for a clearer structure for ACL. Detailed responses are given to the 12 questions posed in the consultation document.
76. fforwm would wish to see the Transformation/ACL reforms brought much closer together with common timetables and a common approach.
77. It would also be sensible if the post-consultation document were more closely linked with the Department for Children, Education, Lifelong Learning and Skills' (DCELLS) consultation on a fees policy, due to start in Spring 2009.
78. The consultation document lacks a clear vision for ACL in Wales. The success factors listed in the section on main policy themes seem to be more process oriented than outcome focused.
79. The consultation document was conceived and developed before the extent of the current economic downturn was realised. The post-consultation document should reflect the important contribution ACL can make to supporting people who have been made redundant or are at risk of losing their jobs.
80. More accurate figures should be given on the overall expenditure for ACL in Wales. There needs to be more accurate analysis of ACL expenditure, broken down by type of learner, mode of attendance and type of provision. A clearer picture should be provided of how much funding each ACL partnership would be responsible for.
81. The 'lead banker' role referred to in the ACL Review would have to be carried out by a statutory public body well used to dealing with the receipt of

public funds. It should always therefore be the local authority or FE college. Guidance would need to be given on the role and remit of the 'lead banker' and the appropriate internal and external audit requirements, particularly important if the 'banker' would also be a provider bidding for funds.

82. The development of ACL provision must be seen in the context of the growing adult population in Wales and the likely increasing demands on education from those in work, those seeking work and those wishing to boost their confidence.