



Department  
for Business  
Innovation & Skills

**ADULT FURTHER EDUCATION**

Consultation Response Form:  
Outcome based success  
measures

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## Annex 4: Response form

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## Summary of key response points

Pearson supports the move towards a greater focus on outcomes, but we have some reservations about the details of the proposals. They set out a range of good ideas for using data to better understand the effectiveness of qualifications for individual learners. Our overriding concern is that any such measures – be they performance tables, destination data or qualification achievements should be designed and implemented with great care to avoid potentially damaging unintended consequences on institutions and learners.

Pearson is fully committed to reporting the efficacy of our own qualifications, and would welcome the opportunity to share expertise and data with BIS in order to make reporting of outcomes as meaningful and reliable as possible.

### Recommendations:

1. The reporting period for sustained employment or learning is not limited to the October – March period in the following academic year. Instead the definition should be “the proportion of learners who start a period of 6 months’ employment [or learning] within 2 months of completion.” The ‘2 months’ could be open to negotiation, but should probably not be more than 3 months if it is to have a direct link to completion of learning. This would remove the anomaly that for some learners the reporting window will open over a year after completion, while for others it could be a few months.
2. In the absence of any way to measure progress within employment, learners who start their programmes in employment and return to employment at the end should be taken out of the main ‘sustained employment’ measure as they do not indicate a particular success by the provider. The fact that they achieved their learning aims (or did not) should be recorded, but they do not make a helpful ‘destination’ statistic.
3. There should be recognition of those providers who do help learners improve their maths and English skills, but it should not focus on GCSE achievement alone.
4. There should be separate measures for English and maths.
5. The measures should recognise a variety of provision in both subjects at various levels from Entry to level 2, and should report the proportion of learners who enrolled without grade C GCSE and who made at least one level of progress.
6. Performance tables for comparison purposes should be designed with care and be based on completion and achievement of the qualifications a learner has enrolled for.

7. While it will not be possible to stop people comparing providers based on destination measures, they should not form the basis of simplistic 'league tables'.
8. A range of contextualising factors should be applied to destination and earnings data, and this should mean that they are not used for crude comparative purposes.
9. BIS and Ofsted should adopt a shared set of contextualising information to publish alongside the data.
10. Information about the use of sub-contractors should be published at a level beneath the headline reporting.
11. Users should be able to investigate below the headlines to look for greater levels of detail by sector, destination, qualification etc.
12. Set a minimum standard for each measure. Providers would be considered to be below the standard if they fell below two of the four thresholds.

**Question 1: Do you believe that the definitions for the headline destination measure and sustained employment and sustained learning measures are appropriate?**

We agree with the over-arching principle that destinations are the best way of measuring the success and effectiveness of providers and qualifications. However there are always questions to be raised about the way that positive destinations are defined and measured. The great diversity of learning opportunities and destinations for the cohort of 19+ learners makes this even more difficult than for those in younger age categories.

*Sustained employment:* Many learners in this age category will already be in work when they take a qualification, and so simply measuring 'the proportion who are in employment in five of the six months between October and March of the following academic year' might not have any relevance to the quality of the provider or qualification – it might simply reflect the nature of the intake. In these cases it would be more meaningful to have a measure relating to whether the qualification led to any change in job role or ability to carry out the existing role. It is recognised that for a system of national reporting this is likely to be a complexity too far.

We also have concerns that those moving into self-employment, which could be quite significant in particular sectors, will not be recorded. Alongside that, it is not clear how part time and full time employment might be distinguished, or employment on a zero-hours basis. If one aim of reporting this 'sustained employment' measure is to inform learners about their potential prospects, then detail like this becomes quite significant.

*Sustained learning:* This measure should work well for learners progressing to HE, as they will start their next stage of learning in line with an academic year, but this will be a small sub-set of learners. For the majority the concept of academic years will be pretty irrelevant, and they will be starting and finishing learning programmes on a roll-on/roll-off basis. For many of those, the opening of the reporting window in October could be a year or more after they actually completed their learning.

*Sustained employment for learners:* This is an important measure in that it does say something about whether those without a job progress into employment on completion of their learning.

*Conclusion and recommendations*

We understand the need to be able to create measures around the data that can be collected in a way that is consistent and comparable, which is what these measures set out to do. However there are many shortcomings that could easily lead to these outcomes misleading potential users. The usefulness of the sustained employment definition is questioned above, and alongside this the proposed reporting period in relation to roll-on/roll-off provision is the other main issue. An example:

- A learner completes their programme in March 2015, and goes on to a higher level programme from May to December 2015. They have progressed to (over) six months 'sustained learning' but this will not be picked up for reporting in the October 2015 to March 2016 window and they will be shown as not having progressed to a positive destination.

- That learner then takes up a job in January 2016 on a one-year fixed contract. At the end of that contract they don't manage to get another job until March 2017. This means that they will once again not be reported as having progressed to a positive destination.

This learner has more than met the definition of progression to sustained learning and sustained employment each time, but in both cases will be shown as not having progressed because of the fixed reporting dates.

*We therefore recommend that:*

1. The reporting period for sustained employment or learning is not limited to the October – March period in the following academic year. Instead the definition should be "the proportion of learners who start a period of 6 months' employment [or learning] within 2 months of completion." The '2 months' could be open to negotiation, but should probably not be more than 3 months if it is to have a direct link to completion of learning. This would remove the anomaly that for some learners the reporting window will open over a year after completion, while for others it could be a few months.

2. In the absence of any way to measure progress within employment, learners who start their programmes in employment and return to employment at the end should be taken out of the main 'sustained employment' measure as they do not indicate a particular success by the provider. The fact that they achieved their learning aims (or did not) should be recorded, but they do not make a helpful 'destination' statistic.

**Question 2: Do you agree that for accountability purposes the headline measure covering all levels of provision should be used?**

Yes

**Question 3: What should be the main features of a measure which records achievement of GCSEs in maths and English?**

We fully support the drive to support all learners in reaching a recognised level of attainment in English and maths. Such attainment can underpin the wider portfolio of qualifications and indeed employment prospects for the learner.

However it is important to distinguish the need to achieve a required level of attainment from the achievement of individual qualifications. Not only is such an approach narrow but it fails to reflect the need to maximise attainment through a range of appropriate learning paths.

In particular there are many questions about whether GCSE is always the most appropriate qualification to aim for, and a performance measure can easily introduce unintended perverse incentives or consequences.

For many adult learners with low levels of English and maths achievement, the requirements of GCSE will not match their needs. What they may need is a more functional approach that puts the study of these subjects much more in the context of their employment area. Functional Maths and Functional English should not be seen or referred to merely as 'stepping stone' qualifications to GCSEs, as this suggests that they are easier in some way. They need to be seen for what they really are, which is a rigorous and demanding alternative to GCSE that is particularly appropriate for the workplace.

It is also unfortunate that in the public perception 'GCSE' is regarded as the benchmark, without a real understanding of what that qualification actually covers and says about the person who holds it. Nevertheless many jobs advertise that applicants need to have GCSE English and/or maths as a minimum requirement, so it can undoubtedly be a major limiting factor for those who have not achieved them.

A crude approach to reporting GCSE achievement alone risks some unintended consequences. If through reporting this measure, providers are held to account for a low level of achievement, they could be reluctant to recruit learners without one or both GCSEs unless they thought they would (a) have the ability, and (b) would be on a long enough course to achieve the qualification(s) alongside the course they actually wanted to take; and from the learner's point of view they could be put off taking up some valuable learning because they felt pressured to add GCSEs in English and maths to their programme. We support any move to encourage achievement in English and maths by those who do not currently hold level 2 qualifications in those subjects, but achievement of GCSE could, for some learners, be a large step to take in a short time and may actually undermine their motivation to progress. It would therefore be more appropriate for the headline measure to report the progress made in these subjects by learners without level 2 achievement. The proportion of those going all the way to GCSE achievement could be reported as a sub-measure beneath this.

*Recommendations:*

3. There should be recognition of those providers who do help learners improve their maths and English skills, but it should not focus on GCSE achievement alone.
4. There should be separate measures for English and maths.
5. The measures should recognise a variety of provision in both subjects at various levels from Entry to level 2, and should report the proportion of learners who enrolled without grade C GCSE and who made at least one level of progress.

**Question 4: What are your views on using performance tables for post-19 provision as an effective means of comparing provision?**

The validity of performance tables and other measures will be determined by the accuracy and completeness of the data they contain. Even then as we discuss in our response to Question 1 above such an approach might lead to inaccurate assessment of different learning institutions.

It is useful for many people and organisations to be able to compare provision, whether it is an individual choosing where to study or a business choosing which provider to work with on delivering their apprenticeships.

It is very appealing to think that there could be one set of measures that will provide definitive answers for all these groups. However the reality is that for properly informed decisions a much greater level of contextualised detail is needed.

Certain data lend themselves better than others to being used for comparative purposes. While we feel that the ultimate worth of learning is measured by the progress it enables, there are too many issues around the current proposals for reporting destination data to make them meaningful to use for comparative purposes. In the experimental data published alongside this consultation, the Army has the best record on the 'sustained employment' measure, essentially because they are training their own employees, so a table which put them at the top would have little value.

We must accept that as soon as data about providers is published people will want to use them to make comparisons, whether or not that is through official tables. The question should therefore be, 'How can performance tables be made as meaningful for comparison as possible?' In this case, comparisons need to be made between fairly simple sets of data which have the fewest contextualising factors. At this stage, we believe that qualification achievement best fits this description.



*Recommendations:*

6. Performance tables for comparison purposes should be designed with care and be based on completion and achievement of the qualifications a learner has enrolled for.
7. While it will not be possible to stop people comparing providers based on destination measures, they should not form the basis of simplistic 'league tables'.

**Question 5: What contextual data/information (if any) should be published alongside the data to ensure that learners and employers are able to make an informed decision about the relative performance of providers?**

The advantage of focusing on completion and achievement is that fewest (but not no) contextualising data are needed in making an informed judgement.

Destination data require a large amount of contextualisation to understand their absolute and relative values. These include the structure and strength of the local employment market (once having defined 'local'); local earnings levels; local deprivation measures; first / second language issues; the proportions of LLDD learners, ex-offenders and other designated groups, and the prior achievement of learners. Ofsted already provides a range of contextualising information with its data profiles; it is important that the final range of contextualising information used in reporting is consistent across both Ofsted and BIS, whether it is the same as Ofsted currently use, or an agreed variation.

There are two major concerns that we have here:

First, if sufficient and appropriate contextualising factors are not applied, then some providers may adjust their recruitment policies to avoid taking on those learners which could have a significant negative impact on their data – for example, those with LLDD or ex-offenders. This would be highly counter-productive.

Second, the more contextualising factors that need to be applied, the more difficult it becomes to interpret – and certainly to compare – the data in a meaningful way. There are so many local factors that legitimately need to be taken into account, that this reinforces our view that while destination data is essential to give a picture of the performance of an individual provider, it should not be the basis on which any comparative tables are produced (see response to question 4).

*Recommendations:*

- 8 A range of contextualising factors should be applied to destination and earnings data, and this should mean that they are not used for crude comparative purposes.

9 BIS and Ofsted should adopt a shared set of contextualising information to publish alongside the data.

**Question 6: Do you agree that headline measures should be included on individual providers' websites?**

Yes.

As with the plans for reporting performance at primary, KS4 and 16-19 there should be a consistent format that is used by all providers.

**Question 7: Do you agree that the measures as currently proposed will help governors and non-executives to hold colleges and providers to account and challenge underperformance?**

The information is potentially a useful addition to the full range of information that governors already use, but should not be taken in isolation from that full range, nor given particular priority over other valuable information. There is already a lot of performance data provided for governing bodies, and the value of this additional data will also depend on the extent to which it can be made available in a user-friendly format.

**Question 8: Do you think results should be published at qualification level and/or at qualification by Awarding Organisation too?**

At Pearson we are fully committed to reporting on the outcomes of our own qualifications, and therefore support this proposal. It should be a measure by which the efficacy of each qualification can be established.

As with the destination data and provider performance, it is tempting to think there is a simple set of inferences that can be drawn from the data, but a whole range of contextualising factors will make it challenging to produce meaningful and accurate interpretations.

Pearson is developing and implementing a whole programme of research activity to collect and analyse the data that will report on the efficacy of our qualifications, and we would very much welcome the opportunity to work closely with teams at BIS to share data and expertise in order to ensure that the publication of qualification level information is as relevant and reliable as it can be.

**Question 9: Do you have views on where and in what format this information should be published?**

If the information is credible and valued by end users, they will be asking questions if awarding organisations are not making it available – so the pressure will come from the market and there will need to be no central regulatory or government requirement for it to be published.

The information that is published should be compiled in a standard way and expressed in a common format, so that legitimate comparisons can be made.

Whatever the national picture for qualification performance, it is likely there will be differences by provider, and providers should also have the opportunity to publish outcomes by qualification as well as the overall picture by destination.

**Question 10: Are there are other breakdowns such as different reference periods or delivery by subcontractors that could be used by local players (e.g. LEPs)?**

As described in our response to question 1, we do not believe that the reference periods as currently proposed for recording destinations is appropriate. So in answering this question, we would refer back to our recommendation (Recommendation 1) for different reference periods, not as part of 'other breakdowns', but as a change to the way the headline measure is compiled.

Providers must be held accountable for the performance of their learners whether they deliver the programme in full themselves or sub-contract elements of it. So the headline data should include all outcomes relating to learners registered with a provider. However it would be useful to have a sub-set of information that showed the proportions of programmes offered by a provider that were (a) partly and (b) wholly outsourced to sub-contractors, and the outcomes of those programmes.

It will be useful for prospective learners, college governors, employers and others to be able to drill down into the headline measures to get to a whole range of different sub-sets of data that report on destinations by sector, for example, or on qualification achievements by level – in effect down to any level that stops short of identifying individual learners.

*Recommendations:*

10. Information about the use of sub-contractors should be published at a level beneath the headline reporting.
11. Users should be able to investigate below the headlines to look for greater levels of detail by sector, destination, qualification etc.

**Question 11: Do you agree with these principles for future Minimum Standards?**

The principles are all appropriate at the level at which they are written; it is always the detail that underlies this level that really matters. As discussed earlier, the speed and the manner in which the system moves away from qualification achievement to outcome focused assessment of performance needs to be carefully considered.

**Question 12: Do you have specific views on a future Minimum Standards methodology?**

We agree that a minimum standard could be set for each, taking into account any contextualising factors.

We believe it would not be helpful to then derive an overall figure from this to use as a threshold (option iii) as this would lose the sharper reporting that is a principle introduced in the 16-19 measures for FE, and could mask some very uneven performance.

Equally, while all providers should aspire to meeting the minimum across all four measures, this would be too high a requirement for a threshold (option i).

If the four measures are to be retained following this consultation, we would therefore support option (ii).

*Recommendation:*

12. Set a minimum standard for each measure. Providers would be considered to be below the standard if they fell below two of the four thresholds.