

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

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

**The closing date for this consultation is 2 December 2015.** Please return completed forms to:

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

Felicity Moore

Vocational Education Directorate

Department for Business, Innovation and Skills

1 Victoria Street

London SW1H 0ET

Tel: 020 7215 6313

Fax: 020 7215 5155

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

I am responding as an individual

**I am responding on behalf of an organisation**

What is your name?

**Mark Anderson**

What is your email address?

**mark.anderson@pearson.com**

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

**Pearson UK**

What is your job title?

**Managing Director, Pearson UK**

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

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

## Executive summary and key feedback

As highlighted in our previous response we fully support the over-arching principle that destinations are the best way of measuring the success and effectiveness of providers and qualifications. Pearson is 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.

This summary captures our recommendations for the next stage for outcome based success measures. These are based on the consultation questions and on other areas that do not fall within one of the questions. They are all expanded on in our full response.

- 1 The new progression measure should be included as an addition to the main destination measures.
- 2 The impact of not capturing learning at the same level but in a different subject in the new progression measure should be monitored in case it creates perverse incentives for providers to progress learners onto higher level programmes they are not yet ready for.
- 3 More flexible reference points should be used to create additional headline measures and these should be used for minimum standards and be published as part of the information for prospective learners, employers and others.
- 4 We support the proposal for how the new minimum standards framework would be used, with the caveat that more flexible reference points should be used to create additional measures.
- 5 We agree with the proposal to give separate scores for benefit learners, treating learning for the unemployed as a "type of learning" in the framework with its own positive destination score.
- 6 We recommend separate scores need to be given for the sustained employment measure for learners with learning difficulties and disabilities in the Minimum Standards, and that destination scores for these learners should 1) be published as part of the information for prospective learners, employers and others, and 2) be kept under review.
- 7 We agree that the five outcome measures should form a core set of measures for local outcome agreements but, as outlined in question 2, recommend more

flexible reference points should be used to create additional headline measures to be included in this core set, and that an English and maths measure should also be included.

- 8 We recommend contextual information is included in the core set of measures for local outcome agreements.
- 9 We support the proposal to introduce a widget that sits on providers' own websites with a consistent set and presentation of data, with the caveat that the most accurate and useful data is displayed.
- 10 If apprenticeship tables are published then they would need to be produced by sector given the differences within sectors. Contextual information about the local labour market should also be included.
- 11 We support the use of a scorecard to give providers useful information about their own performance with the caveat that the extra information we have recommended in this response is included.
- 12 We recommend it is made clear in minimum standards, and in the information for prospective learners, employers and others, that the sustained employment measure is a limited one.
- 13 We recommend that the proposed new progression measures for English and maths should not focus on GCSE achievement alone.
- 14 We recommend that contextual information is included alongside destination measures given these will be influenced by factors such as the type of provision offered and the clientele providers work with.
- 15 We recommend that if part time and full time employment, or employment on a zero-hours basis, cannot be distinguished this needs to be made clear.

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

**Yes**

We agree with the proposed new progression measure and think it should be introduced as an addition to the main destination measure.

As highlighted in our response to the previous consultation, the current sustained learning 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 irrelevant and they will be starting and finishing learning programmes on a roll-on/roll-off basis. For many of these learners the opening of the reporting window in October could be a year or more after they actually completed their learning. Given this new progression measure is not tied to the academic year it should capture more employer responsive provision and other types of flexible FE provision. The new progression measure should be included as an addition to the main destination measures (i.e. sustained employment, sustained learning, and sustained employment for benefit learners).

This new progression measure will not capture learning at the same level but in a different subject. This means it will not capture learners who move on from a level 2 stand-alone qualification to an apprenticeship. The fact that this type of progression is not captured may create perverse incentives for providers to progress learners onto higher level programmes they are not yet ready for. This is unlikely to affect large numbers of learners but the impact of this measure should be monitored. The impact of not capturing learning at the same level but in a different subject should be monitored in case it creates perverse incentives for providers to progress learners onto higher level programmes they are not yet ready for.

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

**No**

We agree with the majority of the principle and features underpinning the new minimum standards framework: i.e. that the minimum standards framework should be a minimum only, that providers should be given data about their performance, that falling below minimum standards should not always result in intervention, that the earnings measure should not be included in the minimum standards framework, and that provision should be grouped into "type of learning" rather than "type of qualification".

However, we do not agree that the framework should use just the *headline* measure (sustained employment and/or learning destination) and the three breakdowns below the headline measure (comprising *sustained employment*, *sustained learning*, and *sustained employment for benefit learners*).

We appreciate that for the sake of simplicity and ease of comparison using a reference period that is consistent with that used by the DfE is a sensible way forward. 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, the great diversity of learning opportunities and destinations for the cohort of 19+ learners makes this more difficult than for those in younger age categories and we have concerns that the use of the existing reference period may have potentially damaging unintended consequences on institutions and learners. For 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.

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

More flexible reference points should be used to create additional headline measures for minimum standards. The definition for a more flexible reference point 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.

These additional measures should be used for minimum standards as they would more accurately reflect the great diversity of learning and employment destinations of 19+ learners, and should be published as part of the information for prospective learners, employers and others to ensure the most useful and relevant information about the destinations of 19+ learners is available.

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

**No**

We agree with the majority of the proposals for how the new minimum standards framework will be used. However, this comes with the caveat that we have outlined in question 2 .i.e. that more flexible reference points should be used to create additional measures to be included in minimum standards, and in the information for prospective learners, employers and others.

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

**Yes**

We agree with the proposal to give separate scores for benefit learners, treating learning for the unemployed as a "type of learning" in the framework with its own positive destination score.

This is a fair way of accounting for those learners. We agree that using destination measures as part of the minimum standards framework should not unfairly penalise providers that offer opportunities to particular groups of learners and if they did unfairly penalise these providers this could have a significant negative impact on the future of the opportunities available for these learners.

We also agree that this would be more informative for users as it would enable providers and others to benchmark performance in delivering sustained destinations for the unemployed.

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

We agree with the proposal not to make any special allowance for learners with learning difficulties and disabilities in the sustained learning measure. The provider should plan to meet the needs of these learners. However, we would suggest separate scores would need to be given for the sustained employment measure for learners with learning difficulties and disabilities in the Minimum Standards framework as providers will have less influence over the employment of these learners.

In addition, we recommend that both learning and employment destination measures for learners with learning difficulties and disabilities should be published as part of the information for prospective learners, employers and others, so the information is available for those who need the detailed breakdown.

We also recommend that these measures be kept under review so that any fall in the destination scores for these learners is captured and analysed. It may be, as highlighted in the consultation, that lower achievement rates observed for these learners signifies that providers are not planning learning to meet the needs of the learners, but these may also signify more general issues providers are having in meeting the needs of these learners. This should form part of a regular review of the information included in minimum standards.

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

**No**

We agree that the five outcome measures should form a core set of measures for local outcome agreements, i.e. headline measure, sustained employment, sustained learning, sustained employment for benefit learners, and the new progression measure. However, we believe that other measures should also be available within this set.

As outlined in question 2, we recommend more flexible reference points should be used to create additional headline measures, and these should be included in the core set of measures for local outcome agreements.

We recommend the English and maths measure should be included in the core set of measures for local outcome agreements. (Further details are given in the last section of this consultation response.)

It will be interesting to see if local outcome agreements align core set of outcome measures.

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

This will very much depend on what the outcome agreements are in each local area but given changes in destination rates at provider level are influenced by factors such as the type of provision offered and the clientele that providers work with, contextual information should be included in the core set of measures for local outcome agreements to inform local outcome agreements.

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

**Yes**

With the caveat that the most accurate and useful data is displayed, (see question 2, and the last section of this consultation response) we agree that, 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 9: Do you support the idea of an FE performance table focused on apprenticeships and higher levels of learning? (see paragraphs 91-92)**

**Yes**

It is useful for many people and organisations to be able to compare provision but these will only be useful if the tables compare like for like. If apprenticeship tables are published then they would need to be produced by sector given the differences within sectors. Contextual information about the local labour market would also need to be included.

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

**Yes**

We agree that individual scorecards will provide a useful tool for both providers and the key local stakeholders. We support the use of a scorecard to give providers useful information about their own performance with the caveat that the extra information we have recommended in this response is included to make it as accurate and as useful as possible for providers.

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

Whilst the measures set out a range of ways of using data to better understand the effectiveness of qualifications for individual learners we still have a number of concerns and questions about the measures, the minimum standards, and the information for prospective learners, employers and others, as proposed in the consultation. These concerns are based on areas where we believe the proposals may result in damaging unintended consequences on institutions and learners and are captured below.

### **Sustained employment measure**

We still have concerns with the sustained employment measure as 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. 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. However, we do recognise, as highlighted in the consultation, that this may be a complexity too far.

We fully support the proposal to give the sustained employment for benefit learners measure more prominence to give a better picture of the number of unemployed learners going into employment.

We recommend it is made clear in minimum standards, and in the information for prospective learners, employers and others that the sustained employment measure a limited one as it may not always indicate the quality of the provider or qualification – it might simply reflect the nature of the intake.

### **English and maths**

We agree that the proposed new progression measure could be a useful way of measuring of progression in English and maths. We also support the proposal to give English and maths outcomes more prominence in the published data.

However, for many adult learners with low levels of English and maths achievement, GCSE qualifications will not match their needs. What they may need is a more functional approach to English and maths that enables them to study and understand these subjects in the context of their area of employment.

We recommend that the proposed new progression measures for English and maths should not focus on GCSE achievement alone. The measure should recognise a variety of provision in both subjects at various levels from Entry to level 2, and report the proportion of learners who enrolled without grade C GCSE and who made at least one level of progress.

### **Contextual information**

The consultation proposes that it is not necessary to show local contextual information alongside the outcome measures to aid interpretation of provider scores as initial analysis shows very little or no relationship between certain external factors such as local unemployment rates or levels of deprivation and destination measures. Bearing this in mind we would welcome the proposal to investigate further some of these indicators during the course of the consultation and over the shadow running period. The Outcome based success measures: Experimental Data 2010/11 – 2012/13 September 2015 highlights that:

*"Changes in destination rates at provider level are influenced by factors such as the type of provision offered and the clientele that providers work with and that these factors should be taken into account to understand that a low rate does not necessarily equate to poor performance."*

We also welcome the proposal to include other information about the provider alongside the outcome measures when these are presented to prospective learners, employers and other users, to give a more rounded picture of the provider (for example, the mix of provision, areas of specialisation, learner and employer satisfaction ratings).

We recommend that given changes in destination rates at provider level are influenced by factors such as the type of provision offered and the clientele that providers work with, contextual information should be included alongside the destination measures so these factors can be taken into account to understand that a low rate does not necessarily equate to poor performance.

### **The self employed, and employment other than full-time**

The consultation is clear that the measures currently only show destinations into paid employment and that learners who go on to be self-employed will not be shown. We welcome the proposal to continue working with the HMRC to understand the most appropriate source to measure self-employment, and have an approach for accounting for self-employment that is fully tested and ready for use by the time the data is published (on 2014/15 learners) in summer 2017. This data will be significant in particular sectors.

It is still not clear from the consultation how or if 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 important.

We recommend that if part time and full time employment, or employment on a zero-hours basis cannot be distinguished this needs to be made clear in minimum standards, and in the information for prospective learners, employers and others.

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

**Please acknowledge this reply**



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

**Yes**