

Focusing English for Speakers of Other Languages (ESOL) on Community Cohesion

1. The National Institute of Adult Continuing Education (NIACE) is an independent non-governmental organisation and charity. Its corporate and individual members come from a range of places where adults learn: in further education colleges and local community settings; in universities, workplaces and prisons as well as in their homes through the media and information technology. NIACE's work is supported by a wide range of bodies including the DIUS (with which it has a formal voluntary sector compact) and other departments of state, by the Welsh Assembly Government, Local Government Association and by the Learning and Skills Council. The ends to which NIACE activities are directed can be summarised as being to secure more, different and better opportunities for adult learners. NIACE works to secure both formal and informal learning at all levels.
2. NIACE is a leading voice in adult learning and represents the interests of all learners, advocating increased opportunities for adult learning and for better quality provision. However as an organisation it is particularly concerned to advance the interests of those who have benefited least from education and training in UK society. The Institute carries out its work through advocacy, research and development and promotion, in partnership with all stakeholders in adult learning.
3. As the largest national agency supporting the development of literacy, language and numeracy for adults, with specialists based in all the English regions to support this work, NIACE is a leading voice on the topic of English for Speakers of Other Languages (ESOL) and published the groundbreaking report *More than a language* (2006) independent Inquiry into ESOL sponsored by NIACE and chaired by Derek Grover CB.
4. NIACE broadly welcomes the proposals set out in the consultation document *Focusing English for Speakers of Other Languages (ESOL) on Community Cohesion*, supporting its intent and the overarching approaches proposed.
5. Particularly welcome are the:
 - intention to prioritise access to state funded ESOL for the most excluded adults
 - rediscovery of the importance of learning for wider social and community benefits
 - recognition of the importance of outreach work
 - recognition of the role of the voluntary sector
 - references to volunteering
 - value placed on local planning of ESOL to allow effective responses to local circumstances.

6. NIACE believes, however that a number of aspects of the paper need to be addressed in more detail or revised to ensure that the government is able to realise its intentions. Such matters include:
- a sharper definition that recognises the complexities of the concept of community cohesion is needed
 - the role of ESOL as only one factor in the promotion of community cohesion needs to be explained in more depth
 - the absence of recognition of the inter-relationship between learning for work and skills and learning for community and of the importance of work place provision in community cohesion
 - the encouragement and promotion of cross-government working
 - those missing from the priority groups, in particular low paid workers and recently arrived spouses who are not eligible for state funded provision
 - the failure to address the question of ESOL for offenders serving sentences in the community.
 - some of the practicalities of applying the criteria
 - the mechanisms for resolving tensions where there might be a mismatch between Local Authority-led plans and LSC targets
 - outreach work practice
 - securing employer buy in
 - a number of funding issues including the overall budget allocated to ESOL and contributions from other government departments.
7. NIACE believes that everyone who comes to live in the UK should have a right to learn English as they need it to live, work and thrive, however long they stay and however wealthy they are. There must be sufficient provision to allow them to do so. This inevitably raises the questions of “Who gets it free? Who pays and how much? What type of provision is offered and by whom?” The consultation paper makes a thoughtful start in addressing these questions and we look forward to seeing a more in-depth consideration following this consultation.

Community cohesion

8. NIACE is pleased that the paper recognises that many potential ESOL learners are socially excluded and that language is a critical factor in developing community cohesion. We broadly agree with the features of a

cohesive community identified by the Commission on Integration and Cohesion that are cited in the paper.

However, NIACE believes that there is an urgent need to sharpen the conceptualisation and language relating to social inclusion, community cohesion and the role of ESOL. There must be recognition of how much the roots of exclusion lie in poverty, racism, fear of difference, inequitable housing policies and inequalities of power and resources, both within communities and wider society as this will help to formulate solutions founded on a recognition of the challenges that need to be tackled to make a real difference. These will need to include all members of communities not just those without proficiency in English because to concentrate on this group could intensify divisions.

9. The problems besetting some communities are related to multiple economic, social, political and attitudinal causes. They are rarely because people do not speak English, although lack of English might add to them. The consultation acknowledges that language is not the sole focus of community cohesion. At the same time, however, the consultation appears to blur the functions of language as a tool for communication with proficiency in English language as a solution to cohesion.
10. Proficiency in English does not necessarily equate with bringing about greater equality or community cohesion since language is a necessary, but not a sufficient condition for cohesion. It is important to recognise that having a common language does not mean that communication or inclusion will follow unless other conditions are in place and factors such as racism and inequalities are challenged. Recognising this point would be helpful.

The inter-relationship between learning for work and skills and learning for community

11. NIACE agrees that ESOL is important, alongside other work to tackle inequality and disadvantage, to enable individuals to access and progress in sustainable work and contribute to cohesive communities. There is insufficient recognition of the role that ESOL at work plays in fostering community cohesion and the inter-relationship between ESOL for work and ESOL for community cohesion. ESOL focused on these two goals can be mutually reinforcing. Whilst improving skills tends to be regarded as employment related and social inclusion or community cohesion initiatives often tend to focus more on the disadvantaged in a geographic area, in practice the two agendas are inextricably linked because the outcomes and benefits of learning tend to ripple far beyond their immediate context. This means that provision with a primary work focus often has wider benefits related to personal, family and community activity, and learning with a community focus often leads to employment or entry into vocational training. Recognising this will help both providers and funders.

Cross-government working

12. The NIACE report *More than a language* recommended greater cross-government working and therefore the commitment in the consultation document to a coherent approach across government is welcome. ESOL for community cohesion will require multi-agency, collaborative approaches. It is disappointing that the document does not make clearer the ways in which DIUS is working with other departments (not least the DCSF) to encourage them to act together to maximise ESOL's key role in fostering community cohesion.
13. It is extremely important to recognise that cohesion concerns all community members, not just those who speak English as another language. Wider adult learning can play an important part in supporting people to develop understanding and relationships, engage in informed and open debate, challenge racism and take ownership of resolving neighbourhood-related resentments and conflicts.
14. Other consultation documents and guidelines with relevance to this agenda include *Building cohesive communities: the crucial role of the new local performance framework* (DCLG), *Face to Face and Side by Side - a framework for inter-faith dialogue and social action* (DCLG), and *The role of Further Education Providers in Promoting Community Cohesion, Fostering Shared Values and Preventing Violent Extremism* (DIUS). The potential of extended schools is also significant. It will be important to have a robust mechanism in place for bringing about closer synergy between the different departmental initiatives addressing community cohesion. Departments should ensure that policy, approaches, terminology and, where possible, funding streams are aligned.
15. This is particularly important in regard to work with the DCLG. One matter requiring an aligned approach will be supporting organisations using DCLG funding for ESOL related to community cohesion to reach the established quality standards and link into appropriate support and progression routes for the learners. The inter-relationship between economic advancement and social cohesion means that cross departmental working with DWP will also be important to heighten the impact of language development on the twin economic and social aspects of the community cohesion agenda.
16. The remainder of this response addresses the consultation areas set out in the document.

Developing national priorities

Priority groups

17. NIACE agrees that state funding for ESOL provision should be prioritised for groups and individuals who have had little previous access to learning and those least likely to access provision. We believe that it is right, therefore, to focus on strategic planning to ensure engage and include and those most likely to be excluded from provision. The evidence gathered from research and from the field for *More than a language*, reinforced by the considered views of committee members, gave a powerful and consistent message that adults with language skills below level 1 are likely to experience the highest levels of exclusion and the most difficulties in accessing services and participating in their communities. NIACE therefore reiterates the recommendation that all ESOL learners with language skills below level 1 should be entitled to free provision until they have reached that level.
18. The recognition that the particular groups vary between areas and localities will enable local authorities to reflect their demography when planning. However, in reprioritising resources, it is important to consider which learners currently accessing provision will miss out. If they are from disadvantaged groups and cannot afford to pay for provision the impact of the changes would be to shift exclusion to different learners.
19. We think that it is right to include asylum seekers in the priorities as they are a group at risk of high levels of exclusion. However, NIACE would remind the government that we believe that the state's duty to asylum seekers should begin immediately the claim for asylum is made. From day one, they need the support and access to essential services that language can give. Research by NRDC shows that the earlier tuition starts for new arrivals the shorter the time needed to learn English. Furthermore, lack of language skills only reinforces isolation and can be detrimental to community relationships. We call on the Government to review their plans in line with their welcome focus on the needs of the most excluded communities.
20. NIACE believes that the indicative list omits two important groups at risk of social exclusion. We are concerned that vulnerable and low paid workers, whether members of settled communities or EU migrant workers, will be excluded from access to provision in the current proposals. They should be added as a priority group to avoid further disadvantaging these individuals. Lack of access to English now could only be building problems for the future. Again, earlier intervention means that money is saved since learners tend to make faster progress.
20. Spouses and fiancées, predominantly women, who arrive for family reunion, find they have to wait at least one year to gain eligibility for state funded ESOL provision. In this period they might start families and/or enter the labour market in this period and this may delay, often indefinitely, their take up of language classes. This is detrimental to learning the language and, therefore, to settlement and community cohesion. Research by the NRDC demonstrates

both the outstanding economic and social benefits of learning English for settlement and the detrimental effects of delays in starting to learn on progress and achievement. If ESOL is available immediately, developing the language and understanding of how society works will help settlement and therefore cohesion. If ESOL is delayed there is a greater likelihood of these women being isolated in their own homes and communities, and less likelihood of them joining in activities which might lead to greater involvement in their communities. This can build up problems for later on because we have to invest greater amounts in translation services, and address underutilisation of such things as medical services and the limited involvement these women can have in their children's schooling.

21. A further omission from the paper is discussion of offenders and the implications for custodial, community sentencing and cohesion issues. The question of ESOL in offender learning, particularly for those serving sentences in the community deserves further consideration. Lack of language could contribute to offenders breaking the law, either through intentional criminal activity, ignorance of the law or culturally determined factors that affect communication with the police and other services.
22. Once within the judicial system lack of language could prevent them from fully accessing services and support. While in custody, lack of English could mean that offenders are not able to access interventions to address offending behaviour or drug and alcohol misuse. Many custodial settings do not have sufficient qualified ESOL tutors to provide ESOL classes. Offenders are eventually released back into the community where poor language skills could make them more at risk of re-offending, unable to access employment, and more likely to get into financial difficulties. Conversely, positive learning experiences in custody or as part of community sentences could reduce some of these risks as they are more likely to be able to integrate successfully back into the community.

Definitions of the priority groups

23. The loose definitions of the proposed priority groups have strengths in that they leave space for including a broad range of disadvantaged learners. At the same time they contain inherently problematic elements.
24. The first concerns the question of whether all the criteria are workable. Determining who 'might reasonably be expected to be in the country for the foreseeable future' is potentially very tricky. The first question is who decides this and on what grounds. How do potential learners prove they intend to stay? Immigration status is not a reliable indicator and intentions change. Workers who arrive on a temporary basis might well decide to stay, especially if their children enter schools or they form relationships in the UK. Many British passport holders who came to the UK in the 1950s/1960s/1970s said they expected to return but most stayed.
25. There are further problems of interpretation of 'those who are at risk of being excluded' or 'parents or carers within families at risk of multiple or complex problems'. Identifying and defining the risk and determining the criteria against

which people will be assessed should not be seen as straightforward and unproblematic. Similarly, the way in which people 'identified in local areas as raising particular issues for community cohesion' is interpreted remains unanswered. This is a highly deficit-based model which could be used to further stigmatise adults who are already disadvantaged.

26. Questions related to proof of eligibility for fee remission stem from these problems of definition and interpretation. Most groups are so vague it is difficult to see how learners could provide proof that they belong to them. Other proofs should rely on enrolment officers and teachers trusting what potential learners tell them. We are concerned that spurious reasons for refusing entry do not develop. There could be some tension with current audit requirements for robust proofs. Providers have a set of proofs they apply to learner status and might not want to take the risk of changing them for ESOL provision.
27. Further questions concern the implications for internal migration and mobility. One example would be the question of what happens to a person who is in a group designated a priority in one area that then moves to an area in which they are not a priority? They will have the same language learning requirements but might be excluded from provision with negative impacts on individual settlement and community cohesion. Once it has been agreed that an individual is a priority then they should remain so, wherever they move to.

Setting ESOL priorities, planning and funding

28. NIACE welcomes the proposed emphasis on local planning as this should allow the development of provision to reflect genuine local needs and circumstances and build in the flexibility to respond to changing economic and community profiles. We do, however, urge the government to put safeguards in place to protect ESOL against negative local decisions stemming from the impact of political circumstances in areas with low levels of community cohesion and high levels of racist attitudes or activity orchestrated by far-right groups such as the BNP.
29. The proposed Local Government area strategies are in our view an effective way to identify local needs and priority groups in different areas. To be effective they should be straightforward and established in ways that achieve the buy-in of providers and result in a collaborative approach to planning provision to meet the full range of needs and avoid duplication. The work currently in progress in Manchester to develop a city ESOL strategy for employability and social inclusion could provide an effective model. Consultation with stakeholders, including providers from different sectors, learners and potential learners has contributed hugely to the vision and content of the strategy and the buy-in of providers. The process in Manchester was chaired by NIACE, managed by the local authority and the LSC together, and paid for by the LSC.
30. It is sensible to include planning for ESOL within existing planning and funding structures. It will be important to ensure that the views of ESOL learners and other bilingual adults are reflected in local planning arrangements. The

consultation processes that inform the development of Sustainable Community Strategies and Local Area Agreements must be conducted in ways that include these groups of adults. In addition inter-agency planning work should be developed to ensure that other initiatives and teams, for instance the specialist community cohesion teams, are best equipped to support ESOL developments and link them into their work with communities. Lack of robust, up-to-date data relating to the need and demand for ESOL is a persistent problem that hinders effective planning. Imaginative use of available statistics with intelligence from grass roots organisations could assist local authorities to develop more accurate pictures of need in their localities.

31. There is a potential tension between national and local priorities and the issue of which priorities gain precedence when locally determined priorities do not align fully with national ones. This might apply, for example, when local authorities do not prioritise ESOL in the LAA targets. 17 of the 35 indicators are already statutory and to introduce a statutory indicator for ESOL could further weaken local responsiveness. Local Authorities could be encouraged to set discretionary additional targets for ESOL, but work will be needed to determine how Local Authorities can be influenced collectively to prioritise ESOL in their planning processes. Government Offices could play an important role in this as advisors and mediators.
32. Local Authorities will have responsibility for planning but the LSC currently holds the budget and has responsibility for planning post-16 learning at local levels. For this reason it is imperative that collaborative arrangements are put in place to support Local Authorities and the LSC to plan together.
33. It will be particularly important to resolve the question of what provision gets funded. There is a potential conflict of interest in the current planning and funding climate between recruiting more disadvantaged learners and achieving PSA targets. LSC funding is often directed to the levels related to the PSA targets, E3, L1 and L2, whereas learners from disadvantaged groups tend to be at pre- entry and Entry levels 1 and 2 that do not count towards the targets although this provided essential progression routes to higher level provision. Under the current funding regime, learning organisations could be penalised if they direct resources to these learners. More and different incentives to recruit and support disadvantaged learners to progress need to be introduced.
34. Local Authority leaders, elected members and officers will have differing levels of knowledge, skills and experiences of the processes needed to develop local ESOL strategies and plans and respond to the challenges entailed in greater local accountability. The complexity and diversity of different communities can pose considerable challenges for elected members and officers who need considerable local knowledge and understanding to enable them to consult and act in the best interests of these groups. Those concerned with developing and delivering ESOL might also benefit from training and support to equip them to make the case powerfully and effectively at local level. A training and support programme could be a constructive way to address development needs that would achieve more effective *results* than setting up and policing complicated structures.

Outreach provision and the voluntary and community sector

35. NIACE welcomes the recognition of the importance of outreach work and the intention need to develop a more coherent and better supported system of outreach. The recommendation needs to be strengthened to address this.
36. Effective community outreach strategies will be crucial to ensure that these learners do participate. Without them there is a danger that providers will find it easier to fill classes with learners who present themselves, rather than securing participation from under-represented groups, and those most in need.
37. Outreach work is not new but has a long history. It is still alive in some areas, but recent staff recruits to the field are likely to have little experience of this work, especially those based in learning organisations with little or no community outreach provision. It is important to revisit and learn lessons from the wealth of experience of established outreach approaches and practices, adapting and updating them for contemporary circumstances where appropriate. Experience and research findings indicate that those with knowledge of their communities are best placed to act as skilled intermediaries to encourage them into meaningful learning opportunities, for example community activists, third sector organisations and local volunteers. A critical success factor will be to ensure that an in-depth understanding of outreach work is developed across the field. This will encompass consultation, creativity, recruitment, advice and guidance, and developing provision, pedagogical practice and learning content suitable to attract different learners. A national training and development programme would enable providers to rediscover good practice in outreach principles, practices and strategies.
38. Recognition of the need to encourage collaboration between the public, private, voluntary and community sectors is very welcome. It is important to recognise that whilst the voluntary and community sector has a valuable role to play in attracting and encouraging new learners, outreach work should not be confined to this sector alone. The public and incorporated FE sectors will also need to carry out outreach activity in their own right as well as work in close liaison with voluntary and community sector organisations to ensure that realistic progression routes and support are put in place.
39. It is also important to identify and disseminate the features of quality practice in community outreach activity. VCS organisations are likely to be primarily offering engagement, mentoring and support activity, but where these organisations also deliver ESOL, mechanisms to support them to offer provision at the national quality standard should be put in place.
40. Boosting outreach has implications for funding and capacity building. Outreach activity is expensive. Recruitment takes time, and the number of learners taking part in learning activities is often small at first although numbers can rapidly escalate once provision gets established and word spreads through a community. Childcare is still a barrier for many and

providing appropriate, high quality childcare will be important. The current funding mechanism, although weighted, does not always fully cover these additional costs. This could be resolved by asking the LSC to develop a funding methodology to reward effective community outreach work, paid for by top slicing the budget to support an outreach dimension.

41. Many smaller voluntary and community organisations are experiencing severe difficulties in accessing funding to provide learning. This has been exacerbated by the increasing focus on vocational and employment related provision and diminishing budgets for the type of work that could support community cohesion. They often lack capacity to compete effectively in the competitive bidding culture and consortia have not been established or proved to be the answer in all areas. It is important that processes for allocating funding for ESOL and community cohesion are made available and accessible this sector.

Quality and training

42. Recent developments in the teacher training infrastructure are welcome, as is the recognition in the consultation that there should be content relating to community cohesion in both initial teacher training and ongoing professional development for teachers already in service, some of whom will have no experience of this area of work. A first step will be to develop a clearer view of what is meant by 'ESOL for community cohesion' as well as the most appropriate pedagogical approaches and curriculum content
43. There will also be a need to ensure that quality issues in ESOL for community cohesion are addressed. Our perception is that little teacher training supports the development of ESOL for community cohesion. In our view DIUS should take up recommendation 8 of *More than a language* and commission a national programme to develop, test and disseminate models and materials for ESOL to support community cohesion and civic and democratic participation. This should be supported by appropriate training and development for staff with different roles, including managers and community outreach workers. The new FE Improvement Body should be asked to adapt the ESOL training in the Quality Initiative to better emphasise ESOL for community cohesion and develop management training to address this area.
44. ESOL for those least likely to access provision can provide them with the language to interact with members of the wider community but does not necessarily mean they will do so. It is important that the ESOL curriculum fosters the attributes of an integrated and cohesive community. As well as helping build mutual trust and relationships between individuals and supporting participation in community activity, this could also entail equipping people to get their voices heard in debate about the type of society in which people want to live and the choices the UK has as a nation. The revision of the ESOL core curriculum document currently in progress provides an opportunity to consider this. There are few materials to support this type of initiative and these will

need to be developed. The *Citizenship materials for ESOL learners* could provide an excellent starting point.

Employer engagement

45. NIACE believes that more robust action is required to ensure that employers take responsibility for funding language provision for their workforces. The paper reiterates the government expectation, set out in other documents that employers should pay for ESOL provision for their workforces. NIACE endorses this view but believes that it is not enough merely to encourage employers to pay. Widespread employer buy-in has not been secured through the prevailing system of voluntarism and exhortation. Although some employers do provide language training for their staff, many are unable or unwilling to do so, especially employers of the lowest paid, most vulnerable workers. It must also be recognised that although businesses might contribute to, and benefit from, social cohesion, the promotion of social cohesion is not their purpose. It is, therefore, questionable whether many will be willing to invest in funding.
46. ESOL for workers, therefore, must be addressed either by regulation or by putting more into the ESOL budget. Failure to do so will leave many low paid workers, already vulnerable to exploitation and isolated from the communities in which they live, unable to secure their rights, progress at work or settle into the communities in which they live.

Funding

47. NIACE believes that it is clear that the funding allocated to ESOL in England is not sufficient to meet the nation's needs in terms of ESOL. In the light of ESOL being a priority; as part of *Skills for Life*, to ensure the right for every citizen to speak the language of the country in which they are living, and as the epitome of demand led learning provision, the government needs to reconsider its funding arrangements, especially at the lower levels. The cap on funding should be lifted, and the allocation of funding for ESOL increased to meet demand. As put forward in paragraph 17 this should include an entitlement for all ESOL learners with language skills below level 1 to free provision until they have reached that level.
48. Different funding streams should be harnessed to support ESOL. Although DIUS should have the leadership role, ESOL cuts across other areas of public policy and as community cohesion is so central to the work of other departments there should be an expectation that they too will contribute funding.
49. One way of approaching this would be to calculate the costs saved by providing access to learning English, and to which Departmental budgets (Health, Communities and Local Government, Schools etc) benefits would accrue. A holistic analysis that includes the economic benefits of English language such as securing sustainable work, improving health and well being,

and increasing children's school attainment, thereby breaking the circles of deprivation that research shows in families where parents have poor language skills, could help to make the case for sufficient ESOL provision and budget.

50. In relation to DIUS funding, the challenge is how the funding is used on the ground. It is important to consider how the LSC can interpret and implement the requirements. People with English language learning needs often have additional learning priorities. They might want to prioritise learning another subject, often in embedded provision or with language support. Focusing planning and funding on discrete ESOL but not other subjects has implications for embedded ESOL and progression routes which need to be addressed in the strategy.

51. Cut off points or targeted funding related exclusively to levels have unintended consequences which have the potential to severely disadvantage individuals from the priority groups. The achievement of greater social inclusion, as the Neighbourhood Renewal Unit stressed, requires long term investment to allow individuals and their communities to build sufficient skills and confidence to bring about change. The individuals furthest from community integration and the labour market often require a substantial length of time to progress into community activity, and most will not suddenly migrate into employment the moment they achieve entry level 2. For instance a Bangladeshi woman who reached Entry level 2 but was not ready to enter the workforce could then be abandoned if all state funding above entry level 2 were allocated to work related provision. Equally, individuals in work are often at entry levels one and two and Train to Gain will be more successful if it can be flexed to enhance ESOL progression and support cohesion.

52. It is, therefore, important to secure a flexible system that recognises a range of meaningful progression routes. Initiatives to support these new learners to stay their course and progress, including mentors and effective and timely IAG should also be considered.

53. NIACE welcomes the opportunity to contribute to this consultation and would be pleased to supply further analysis or clarification of anything in this response. In the first instance please contact: Jane Ward, Regional Development Officer (jane.ward@niace.org.uk).

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