



'We expect the LSC to be better able to support learning provision which meets real needs by removing the distinctions created by Schedule 2 of the Further and Higher Education Act 1992. Whilst qualifications are very important and accreditation will continue to be appropriate for the majority of courses, we also want to see the LSC provide opportunities with scope for learners to gain recognition for their achievements other than through qualifications'

Raising Standards in Post-16 Education, 5.27

Squaring the circle

Funding non-accredited adult learning under
the Learning and Skills Council

Cheryl Turner

Introduction

This paper looks at how non-accredited learning might be supported under the Learning and Skills Council (LSC). It explores the scope for funding, setting this in the context of the quality assurance arrangements, and it examines some of the issues affecting the development of a quality framework for non-accredited programmes. The paper concludes with a set of criteria for demonstrating the eligibility of this work for mainstream funding.

The arguments and proposals that follow are offered as work in progress to stimulate discussion about the issues and to contribute towards their resolution. The context for this includes a significant body of existing material examining achievement in more informal learning, and an on-going debate about how to resource it.¹ This debate is now urgent.

During 2001 the LSC will consult on the introduction of a framework for ensuring eligibility for 'other' provision that will apply from September 2002 and affect most programmes for adult learners. The repeal of Schedule 2 of the **Further and Higher Education Act 1992** introduced two new terms to describe recognised provision: 'qualifications' which refers to everything on the list of approved qualifications under Section 96 and eventually Section 97 of the Learning and Skills Act;² and 'other' which refers to all other provision. Currently this means that the vast majority of programmes for adults are defined as 'other' including those leading to externally awarded or institution certificates and courses leading to non-certificated or non-accredited outcomes.

The outcomes of the proposed consultation will have a major impact upon the experience of adult learners. It is imperative that the design of the framework is debated fully, taking account of the particular attributes and contribution of non-accredited learning. It is worth remembering that around 67% of learners involved in adult and community learning are participating in non-accredited courses.

Eligibility criteria developed by the LSC for 'other' provision will need to reflect its very considerable diversity. Within this there is the further, substantial challenge of creating a framework that will ensure quality across the range of non-accredited provision whilst protecting its wonderful plasticity. Learners have a right to the

highest standards wherever and whatever they learn. This imperative is paramount but it must be weighed against ensuring that quality systems are not inappropriately bureaucratic and unwittingly hostile to certain provision, particularly informal and community-based learning, and certain providers, notably the smaller, less well-resourced organisations that the LSC is committed to involving.

Squaring this circle will need greater and more inclusive discussion of the complexities and a commitment to protecting and nurturing high quality provision, wherever it occurs. Above all, it will require a persistent focus upon the distinctive importance of non-accredited learning and on what learners themselves have to say about its benefits and value.

Devising a framework in the abstract is one thing, ensuring its feasibility is quite another. In the long run, appropriateness will be determined by application, and advance notice that a system is likely to be inoperable by some of its potential users is helpful. The LSC consultation process around eligibility should allow for scrutiny by those working in a representative range of contexts and with diverse groups of learners. There is a marked discrepancy between those who deliver adult learning, who are overwhelmingly part-time workers, and those who debate its future, who are largely full-time staff with access to the appropriate forums. The consultation process must take account of tutors' perceptions.

It should also draw upon learners' views on the benefits and disadvantages of the framework, its impact upon the experience of learning, and on what learners might reasonably be asked to contribute. Current NIACE research into learners' perceptions of existing approaches to the identification and validation of achievement from non-accredited programmes should provide some insights into these issues.³

It is worth noting that the criteria offered in this paper have been discussed and amended by practitioners delivering non-accredited programmes in the further education, local authority and voluntary and community sectors.⁴ By and large they were endorsed but further debate and testing against experience is clearly necessary.

Context

The role of non-accredited learning

It is clear that although the LSC will be concerned primarily with the development of skills within a recognised national qualification framework, it is charged with meeting a wider range of learning needs and aspirations. The **Remit Letter** from the Secretary of State to the LSC setting out the operational priorities for the Council's first year argues that

not all learning should lead to awards. Encouraging adults back into learning and helping the more disadvantaged through relevant provision will also be important. Such first rung provision should, where practicable, act as a stepping stone into further learning leading to qualifications or units of qualifications, but many adults, including large numbers of older and retired learners will want to pursue high quality and rigorous study for its own sake, and I expect provision to be made available to meet their needs⁵

Although not quite the celebration of lifelong learning that so distinguished the Foreword to **The Learning Age**, this offers a valuable counterweight to the instrumentalism behind recent post-16 education policy. The question remains, however, as it did after 1992 in relation to the local authorities' duty to secure 'adequate' provision of non-Schedule 2, as to whether an expectation carries sufficient force to reverse major deficiencies in provision of this kind.

Equally, the **Remit Letter**, in common with other LSC documentation, highlights the pivotal role of non-accredited provision in the achievement of the Government's ambition to widen participation in learning. According to the FEFC **Guidance on Further Education Funding Rates 2001-02**, the Secretary of State has identified this as a key objective for the sector and "expects 65% of additional adult learners to be drawn from those groups whose background had disadvantaged them"⁶ – an impossible target without sufficient, appropriate non-accredited provision. This is reflected in David Melville's statement that "The Council wishes to see institutions formerly funded by the FEFC making full use of the opportunities offered by the legislation [repeal of Schedule 2] to introduce high quality, creative and innovative



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Learning through theatrical improvisation

non-qualification bearing provision...to reach out to new learners".⁷

There may be a need to debate what constitutes a 'new' learner in terms of the required length of absence from explicit learning opportunities, but the emphasis upon reaching different and more adult learners is clear. It will inform the way the performance of existing providers is assessed and drive forward an openness (probably after the transition period) to new providers, particularly from the voluntary and community sector. Such organisations are seen as better able to work with more disadvantaged communities and to develop much-needed informal and community-based provision.

This must raise issues of capacity, particularly in relation to the principle underpinning inspection and review, that all providers and provision should be subject to the same scrutiny. The Adult Learning Inspectorate is aware of this tension and the adult and community learning pilots may help to point to suitable responses. However, it is essential that the views of the voluntary and community sector also inform the development of any approaches.

The clear acknowledgement of the link between widening participation and non-accredited learning is welcome, but again the question of proportionality in the allocation of resources is key. As the report of the Policy Action Team on Skills concluded, 'first rung' provision of the kind most likely to appeal to more hesitant and sceptical learners has been insufficiently available because, in part, "public policy has concentrated strongly in

recent years on providing education and training which leads to qualifications. This has led to a significant mismatch between the provision that is available and what is actually needed".⁸ A strong policy push, with accompanying resources, is needed if we are to address this distortion.

The underlying concern, however, applies across the range of non-accredited work, in all its considerable diversity. There needs to be greater clarity about the scale of local LSC resources that will be allocated to non-accredited learning and the extent to which this will be a matter for local determination. An explanation of the role of the national LSC in identifying and moderating significant sub-regional discrepancies is also essential.

There are two further related issues. The first concerns the scope of non-accredited learning to be funded by the LSC and the extent to which the balance of potential types of provision will be left to local planning processes involving local authorities and learning partnerships. Will these mechanisms encourage the diversity of programmes needed to address, for example, both widening participation in learning and the notable decline since 1997 in the participation of older learners?⁹ Second, there is a need for clarity around the policy priorities for new growth. The FEFC guidelines are clear that not only does the Council expect institutions to prioritise courses leading to qualifications, but also that it requires them "not to plan to increase 'other provision' at the expense of existing provision leading to qualifications".¹⁰ Set against these injunctions, a significant increase in non-accredited learning appears to be dependent largely upon the scale and priorities of any expansion in provision for adults.

Raising standards

All priorities for the LSC will be shaped by the drive to raise standards.

It [the LSC] will need to introduce robust arrangements to tackle deep seated problems of inconsistency of standards by challenging poor and coasting providers, and by ensuring excellence in teaching and training which meets the needs of learners, and which promotes equality of opportunity.¹¹

This imperative will apply to all learning funded through the LSC. All providers will have a

responsibility to establish and sustain a culture of continuous quality improvement largely through self-assessment and development planning (a key contractual requirement), monitoring and LSC provider review. This will be supported by external inspection. The Common Inspection Framework (CIF) will guide the independent inspectorate OFSTED and the new Adult Learning Inspectorate (ALI) in their review of all LSC-funded provision, including non-accredited programmes. It will also be the basis for provider self-assessment.

Common Inspection Framework

The CIF will determine the content of external inspections and of the self-assessment report for every LSC-funded provider. Within the CIF, inspection will focus primarily upon the experiences and expectations of individual learners through evaluation of five key aspects of provision. These include "what is achieved – the standards reached and learners' achievements, taking account of their prior attainment and intended learning goals". The CIF defines the latter as including "greater knowledge, understanding and skills, occupational competence, milestones towards qualifications or employment" as well as qualifications themselves.¹² It is worth noting the implication within the CIF that starting points are known or have been identified in some way, for example through some form of initial assessment.

The framework is built around seven broad questions, each of which is defined by a series of evaluation statements. Amongst these, inspectors and providers will be required to address: how well teaching and training meet individuals' needs and how well learners learn and make progress; and how effectively, through quality assurance and self-assessment, performance is monitored and evaluated and what steps are taken to secure improvement. There is a clear emphasis on careful assessment and recording of the progress of individual learners against specified (and challenging) learning goals taking account of earlier attainment, potential and aspirations.

The eligibility criteria proposed by this paper offer a quality assurance framework for non-accredited provision which corresponds broadly with the key questions and statements of the CIF and which will therefore also meet some of the

requirements of provider self-assessment and review. It is hoped that this will help providers engaged in direct delivery, and local authorities who secure such provision through contracts with other bodies, to develop appropriate quality standards for this work.

Eligibility criteria

The arguments and criteria that follow can only sketch the parameters for debate. Further useful information will be offered by two forthcoming joint publications by the Learning and Skills Development Agency (LSDA) and NIACE based on a shared research project examining how to identify achievement in non-accredited learning.¹³

Criteria

The eligibility criteria presented at the end of this paper have been grouped under the three aspects of 'non-qualification bearing courses' identified by the FEFC. The order has been reversed, however, to give precedence to the learner, a symbolic assertion of the welcome shift to a demand-led system. These aspects are:

- ◆ the relevance of the programme to individual learning needs
- ◆ the content and delivery of the programme
- ◆ the quality of the provider and its facilities.

The criteria are framed in terms of what providers are expected to demonstrate. This is because, as the recipients or potential recipients of LSC funding, they will have the responsibility for providing evidence of their own eligibility and that of their programmes. This should not be seen as privileging institutional interests and it is important to note the need for a concurrent debate about learner eligibility for access to subsidised learning. Changing nomenclature is often a signal of changing (or emerging) ideas and we should note the growing tendency to refer to non-accredited learning as 'progression' provision. What are the implications of this for the eligibility of, for example, older people who study for non-progression reasons associated with an active retirement, or more hesitant adult returners who derive benefit and pleasure from learning but who do not (yet) want to move on to accredited programmes?

Currently, there are only two exceptions built



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Cooking up some learning

into the application of the criteria. These are linked to programme length and to the capacity of the provider. It is suggested that very short programmes might be exempted from periodic internal review of learner progress, and that provider resources and learner interest should determine the offer of enrichment activities. No differentiation has been made between groups or types of learners or between 'new' and established providers. The LSC and Employment Service are both looking at some form of initial evaluation of 'new' providers to ensure they meet the LSC's requirements. This will need to address the definitional wrinkle of whether 'new' providers would include established providers who are moving to a significantly new curriculum area.

The question of how the proposed criteria would work in practice is clearly central to any discussion of their value. Whilst they are intended to be a disaggregation of core good practice for the delivery of safe, high-quality, learner-focused non-accredited learning, it is possible that they may not be suitable to act as a set of minimum standards for the full range of potential providers and learning. Any ensuing discussion must address the issue of capacity and the fact that it will take time and investment of resources for some providers to reach higher levels of quality assurance. It must also review the different types of non-accredited learning and examine whether the criteria would support their development.

It might be helpful to draw a comparison with the Common Inspection Framework. The quality indicators in the CIF include minimum, indeed

statutory, requirements such as the provision of equality of opportunity and access, and ensuring that the learning environment is healthy and safe. They also include aspirational targets. Providers who meet the criteria in full are likely to be judged 'outstanding' when inspected. Similarly, the proposed eligibility criteria are, in effect, three sets of quality indicators relating to learners, programmes and providers. Although, as was noted earlier, they have been endorsed by a range of practitioners and those charged with the development of policy and provision, we need to interrogate them. For example, we should ask:

- ◆ are they individually and collectively appropriate for determining eligibility for funding non-accredited learning?
- ◆ allowing for the two current exceptions, are the criteria, taken as a whole, acceptable as a minimum requirement for all providers and provision?
- ◆ if not, which criteria belong within a non-negotiable core and on what basis would differentiation be acceptable?

Evidence

It is useful to distinguish between short and longer-term responses to the question of how the LSC might interpret achievement from non-accredited learning. In the early phases of LSC operations it would be practicable to focus on the extent to which agreed learning outcomes are achieved. There are precedents for this, for example in the area of basic skills, and it accords with the observation of the ***Draft Final Report From the 'Interim Provider Performance Indicators For Use by the LSC' Project***, that until August 2002, the universal indicator of achievement rates will probably be achievement of a 'positive outcome'. However, it is important that the achievement of outcomes should take account of the unplanned as well as the planned gains from learning. ***Pathways in adult learning*** confirmed what experience has always shown, that adults value highly such unforeseen outcomes as greater confidence and sense of self-worth.

Of equal importance is the issue of how the achievement of outcomes can be demonstrated. Quantitative data will clearly be a key component of the LSC's evidence base, but it is important to note the major role that qualitative information will play in this context (see Learner Criteria, page

12). The development of the LSC's quality improvement strategy creates both the opportunity and the need to explore how imaginative and less conventional approaches to demonstrating achievement can be used to interpret effectiveness. This is essential if the LSC is to nurture and not simply fund non-accredited adult learning. The LSC could draw upon existing good practice in this area (for example, from the Adult and Community Learning Fund) to help shape its thinking.

Overall, the scope of acceptable evidence would be influenced by a number of variables including:

- ◆ ***learners'*** different capacities and the levels at which they engage – this would reflect previous educational attainment, learner purpose, life experience, and learning needs, all of which (in what are usually open-access courses) would be very diverse
- ◆ ***programme*** content and duration – for example a range of outcomes including artefacts, performances, demonstrations, and portfolios of material would all have their place as evidence of learning gain in a wide-ranging programme of non-accredited provision
- ◆ ***providers' resources*** – without compromising the drive to secure high quality provision for all learners, interpretations of achievement and the amount of supporting evidence must be realistic and deliverable for the range of organisations and institutions with a contribution to make to adult learning.

In other words, within this framework the means of demonstrating achievement in a one-day school on nineteenth-century literature offered within a mainstream 'liberal' programme would differ from that used on a short course on confidence-building for substance abusers or 20 weeks on woodcarving and sculpture for adults with learning difficulties.

For a six-session programme, therefore, sufficient evidence of achievement might be a portfolio containing:

- ◆ a syllabus (outlining rationale, content, aims and delivery methods)
- ◆ planned learning objectives for each learner
- ◆ evidence of outcomes (included unanticipated outcomes) along with programme evaluations
- ◆ a note of progression opportunities and any learner progression
- ◆ tutor's/facilitator's assessment and summary of the programme.

Demonstrating degrees of learning gain would be linked not just to the range of acceptable evidence but also to the ways in which that evidence could be used to validate the judgements of different stakeholders. For example, combining learner self-assessment, tutors'/facilitators' reports, class observation and internal moderation to confirm a picture of individual or group achievement would draw both separate and reciprocal benefit from these sources.

Indicative evidence

Several suggestions for indicative evidence are given against each of the proposed criteria at the end of this paper. These are not lists of required documentation. Such an assemblage would be truly formidable, inappropriate and would send metaphors involving nuts and sledgehammers rushing to mind. On the contrary, they offer a comprehensive range of different sources, each of which would provide some evidence to demonstrate the achievement of the criteria.

The expectation is that providers will supply, for each criterion, the form of evidence that best suits the nature of the learning, the learners, the context and their own capacity. For one provider, therefore, a statement of agreed learning objectives might be the most suitable way to demonstrate that learners have opportunities to agree learning needs and goals, for another it might be through individual learning plans. It is essential that neither the LSC nor ALI should hold fixed notions of suitable evidence but rather work from the question (or criterion) the evidence is intended to illuminate and judge suitability against context, including learner purpose. In other words, the evidence required by the LSC/ALI and produced by the provider must be 'fit for purpose' in content and scale and, for consistency, within an agreed range of options.

Key issues

Interpreting evidence

On the ground, producing and retaining the suggested portfolio of evidence of achievement is close to common practice for much non-accredited provision and would probably not be a cause for great concern. Subsequent interpretation of the

evidence might be. For example, negotiating learning outcomes is a key element of good practice in non-accredited learning and will often occur more than once through a course as part of formative assessment for the purposes of reviewing learning progress. As a result, the syllabus and learning outcomes agreed at the start of the programme may well change by the time it ends.

Similarly, evidence of learner progression, or more specifically the absence of such, should be viewed against the fact that for many non-accredited programmes, the learning achieved is seen as an end in itself and not a precursor to higher level learning or employment – although it might incidentally promote this. In this context we should distinguish between progress (which is at the heart of all successful learning) and progression (which is an outcome of successful learning). It would be unfortunate, and indeed ironic given the declared intentions of the Government, if the LSC should repeat some of the mistakes arising from the 1992 Act by subscribing to the assumption that non-accredited learning necessarily functions as the "first step" in a progression ladder taking the learner inexorably onwards and upwards. Learner purpose is far more complex and unpredictable. A better metaphor would be to see the 'ladder' as part of an 'adventure playground' for learning involving bouncy castles, roundabouts and slides. This might help to capture some of the richness, diversity, unpredictability and joy involved in learner progress and progression.

Staff development

Issues arising from the interpretation of evidence highlight a requirement for sufficient, timely and well-informed staff development and training for the Inspectorate and LSC staff involved in provider review. Their judgements and recommendations must take proper account of the nuances of context and learner purposes that determine the rich mix of adult learning.

Equally, there is a need for staff development for practitioners (including part-time tutors) involved in the development and delivery of non-accredited learning. Piloting the criteria amongst local authority and further education staff identified a demand for training in recognising and recording achievement, data collection, self-assessment, preparing for review and inspection,

and benchmarking. This reinforces strong messages emerging from the Adult and Community Learning Fund and the FEFC non-Schedule 2 pilots about the need for training in such areas as identifying and articulating learning outcomes and processes for evaluating learning gain.

The Department for Education and Employment (DfEE) has initiated a valuable response through a programme of quality improvement support for adult and community learning providers. This will help local authorities, and the providers they fund, to address most of the issues outlined above through a comprehensive range of training and support measures.¹⁴ Although the reach of the programme will include some voluntary and community organisations, the question remains as to how, in the prevailing time scale, this part of the sector will find the levels of support and training needed to fulfil its potential within adult learning.

Eligibility criteria and...

Discussion of the following three areas in relation to the criteria is important not least because it will help to define the range of outcomes that such a framework can cover and help us to recognise the gains and benefits from learning that remain unaccounted for.

...group learning

The focus within the proposed eligibility criteria upon the individual learner reflects the emphasis of the Common Inspection Framework. This does not take account of the achievements and progress of the whole group or class. We are all familiar with the way in which students develop needs and dispositions as a group and we know that these are a significant element of successful learning. It is arguable that group learning is potentially one of the ways of developing or facilitating social inclusion within learning programmes, as the CIF requires. Amending the criteria to reflect collective need and gain might be a useful component of any ensuing debate.

...social impact

An individualistic approach will also fail to reflect the significant part played by informal and non-accredited learning in the development of social capital and community sustainability. The catalyst for such provision will sometimes be a local

community need or aspiration that stimulates a demand for activism supported by learning. The achievements that flow from this will be both collective and individual and the benefits potentially wider and longer term. We know the signs – strengthened membership of local community organisations, better networks, lower crime rates, higher levels of participation in local democracy – but the issue is how we capture such repercussions from learning in the evidence of outcomes. When and how do we evaluate the wider social benefits of learning?

...‘eureka’ moments

The outcomes of non-accredited learning often manifest themselves in different ways to those anticipated and in different locations to the original learning situation. The proposed criteria do not take account of the delayed recognition of learning, the deferred moment of epiphany, the eventual use of a skill that takes place some time after the programme itself has finished. The settling of knowledge is important to any understanding of successful lifelong learning and learner progress and progression, but how do we construct a methodology for judging the effectiveness of learning that allows for this process? How do we build in the necessary timescales?

Defining the provider

The term ‘provider’ requires further clarification. The LSC is clear that the primary responsibility for quality assurance rests with the provider. However, many colleges and local authorities secure non-accredited programmes through partnerships and contracting arrangements with other bodies. Moreover, recent developments in the voluntary and community sector offer the possibility of consortia acting as intermediaries for smaller sector organisations seeking LSC funding. There may be a case for distinguishing within the proposed criteria between the responsibilities of the lead body and those of the delivery organisation. An analogy might be the FEFC arrangements for institutions, partners and franchisees.¹⁵

Benchmarking

Benchmarking is seen as an important element of self-assessment and the establishment of quality

standards. However, as the guidelines acknowledge, many providers are unused to working with such data and will need support in order to do so. Additionally, some providers will perform well against the criteria overall but struggle with benchmarking due to fairly intractable (at least in the short term) issues around resources. Finding proxies in this area might offer a way forward and protect rather than threaten high quality provision. The question is, where are they?

Perhaps of greater immediate significance are the deficiencies in the data itself. As the documentation concedes, appropriate benchmarks may not exist for some areas of post-16 learning “such as some aspects of adult and community learning” and further research will be needed to develop them.¹⁶ Finding approaches to contextualisation will also be important. For example, although the majority of respondents to the consultation on ‘Raising Standards’ regarded benchmarks as helpful to quality improvement, the overriding view was that comparisons should be conducted on a ‘like with like’ basis and take socio-economic factors into account. Without supporting contextual information, the data was seen as potentially misleading, contentious and demoralising.¹⁷

Clearly, the widespread use of benchmarking in relation to non-accredited programmes is impractical in the immediate term. There is a need to explore how such provision might eventually benefit from the use of benchmarks without smaller providers being eliminated in the process.

Measuring achievement

Whilst the type and use of evidence outlined in this paper can validate outcomes of learning, it will not measure them. Validation suggests a process for confirming the quality and outcomes of learning through some form of moderation, internal or external. Measurement implies a means of gauging the ‘distance travelled’ by learners, of knowing their points of departure and conclusion.

Initial assessment would provide some of the necessary data for identifying ‘distance travelled’ but we need to distinguish between the informal conversations between tutor and learner that help to shape the way learning develops, and more formal initial assessment. For some types of learning such as longer courses, basic skills work and programmes for adults with learning



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Reminiscence and learning project.

difficulties, formal assessment is an important element of good practice. However, its wider use would be contentious and inappropriate for some forms of provision and some groups of learners. We lack assessment instruments that would suit the diversity of learners and learner purposes. More importantly, it would be anathema to many people who have chosen to participate in non-accredited learning and particularly in shorter programmes – imagine the response of an older learner following a six-session course in music history. It could also be highly damaging to more hesitant and marginalised learners unless deployment is sufficiently skilful to avoid the construction of deficit models.

In the longer term, attempts to identify ‘distance travelled’, for example by the Employment Service in relation to New Deal and by the DfEE for Connexions Learning Gateway, may shed more light upon its potential as a performance indicator. The LSC will almost certainly wish to address ‘distance travelled’ and value added in the future. However, it is important to recognise that measurement does not in itself guarantee rigour, accuracy or sound judgements. The latter are inevitably subjective and informed by expertise and experience. Furthermore, it is neither practicable nor desirable to try to measure achievement in all types of learning (as the term is defined above) and it is not feasible to do so in relation to non-accredited learning under current circumstances. It is worth noting that measuring ‘distance travelled’ is not necessarily a feature of qualification-based provision either.

This does not mean that we are unable to construct a rigorous system for identifying and validating achievement in such provision taking account of individual learning goals and the unanticipated significances of learning. The identification, recording and evaluation of learning gain, including that defined by the achievement of agreed learning objectives, offers a way forward.

Issues arising and questions

Issues arising

This paper has raised a number of issues or areas for further discussion and clarification. These are:

- ◆ learners' perceptions of the value and impact of any proposed frameworks
- ◆ the scope for increasing expenditure, through the LSC, on non-accredited learning, and the role of local planning processes in supporting a wide range of provision
- ◆ mechanisms for holding local LSCs to account for the levels of their support for non-accredited provision, including moderation of discrepancies by the national LSC
- ◆ learner eligibility for access to subsidised learning
- ◆ the impact of bureaucracy upon smaller providers, particularly in relation to data management and benchmarking, and the need to find suitable proxies
- ◆ the interpretation of evidence in the context of non-accredited learning, and in particular, the issue of learner progress and progression
- ◆ the provision of sufficient, appropriate training and support for ALI/LSC staff and providers in relation to the inspection and review of non-accredited learning and good practice in delivery – recognising the lack of experience in these areas among many existing providers
- ◆ training and support in the above areas for voluntary and community sector providers
- ◆ the incorporation of group achievement, wider impact and delayed recognition of achievement into the eligibility criteria
- ◆ the application of benchmarks, 'distance travelled', initial assessment and measurement in relation to non-accredited learning

Questions

In addition, the paper has posed the following questions against the eligibility criteria

- ◆ are they individually and collectively appropriate for determining eligibility for funding non-accredited learning?
- ◆ allowing for the two current exceptions, are the criteria, taken as a whole, acceptable as a minimum requirement for all providers and provision?
- ◆ if not, which criteria belong within a non-negotiable core and on what basis would differentiation be acceptable?

There are various other questions that readers might want to consider. For example:

- ◆ What alternative sources of evidence could be used to demonstrate the achievement of the eligibility criteria?
- ◆ Could we map eligibility criteria for non-accredited learning onto, for example, an Open College framework in order to create more coherent progression routes, and what would be the disadvantages or risks in doing so?
- ◆ What other actions should be taken by the government, including the LSC and the DfEE, to encourage and fund effective non-accredited provision?
- ◆ How can such actions and the developing funding methodology be influenced by other stakeholders, including practitioners and learners?
- ◆ What actions can be taken to influence this agenda and in particular the work of the LSC and ALI?

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1. See Cullen, J., Batterbury, S., Foresti, M., Lyons, C. and Stern, E., **Informal Learning and Widening Participation**, ED RU, 1999; Dewson, S., Eccles, J., Tackey, N.D., and Jackson A., **Measuring Soft Outcomes and Distance Travelled**. Research Report 219, DfEE, 2000; Donley, J. and Napper, R. **Assessment Matters in Adult Learning**, Oxfordshire County Council and NIACE, 1999; Hayes, A., Lavender, P., Reisenberger, A. and Vorhaus, J., **Outcomes of adult learning: taking the debate forward**, FED A/NIACE, 1999
2. See **Guidance on Further Education Funding Eligibility and Rates 2001-02**, FEFC, 2001, paras 126-132
3. Publication by NIACE of the results of the research is expected Autumn 2001
4. This includes the WEA (East Midlands and North Western Districts and National Association); Mary Ward Centre; Kensington and Chelsea College; City Literary Institute; Cheshire County Council Adult Education Service
5. **The Learning and Skills Council Remit Letter from the Secretary of State for Education and Employment**, DfEE, November 2000, pt 26
6. **Guidance** op. cit., para 87
7. **Funding Guidance on Funding Allocations 2001-02**, Circular 01/15, FEFC, March 2001, p.5
8. **Skills for Neighbourhood Renewal: Local Solutions. Final Report of the Policy Action Team on Skills**, DfEE, 1999, p.11
9. "There has been a 20% fall in participation by retired people over the last 3 years from 12% to 9% among current learners, and from 20% to 16% among current/recent learners"; source, **Marking Time: The NIACE Survey on Adult Participation in Learning 1999** by Alan Tuckett and Naomi Sargant, NIACE, 1999, p. 5
10. **Guidance** op. cit., p. 5
11. **Remit Letter** op. cit., pt. 62
12. **The Common Inspection Framework for Inspecting Post-16 Education and Training, ALI and OFSTED**, February 2001, 'Terms Used'
13. The research comprises two main threads. The first, led by the Learning and Skills Development Agency (LSDA), focuses upon case studies of current practice with a view to identifying key principles and critical success factors. The second, led by NIACE, focuses upon the experiences and views of learners as subjects of and participants in current approaches to identifying achievement in non-accredited learning. Two publications are expected: a practice-based text in the early summer which will highlight the case studies, followed in the late Autumn by an analysis of the outcomes of the NIACE research.
14. The DfEE is funding LSDA, working closely in partnership with NIACE, to run the programme for three years. It will include a telephone helpline, information packs, newsletters, training workshops, a website with links, staff development guides, regional quality improvement networks and consultant support.
15. See **Guidance** op. cit. Table 2. 'Types of partnership and franchise arrangements', p.33
16. **Raising Standards in Post-16 Learning, Self Assessment and Development Plans**, ALI, ES, LSC and Ofsted, March 2001, p.22
17. **Learning to Succeed. Raising Standards in Post 16 Learning: Responses to the Consultation, May-June 2000**, Employment Service and DfEE, 2000, p.22

Learner criteria

All providers should demonstrate that the learners on their programmes have:

Criteria	Range of possible (not required) indicative evidence
<ul style="list-style-type: none"> opportunities to discuss and agree individual (and/or collective) learning needs and goals 	<ul style="list-style-type: none"> individual (and/or collective) learning agreements; individual learning plans; statement of agreed learning objectives; pre-course questionnaires
<ul style="list-style-type: none"> information about the curriculum, the level of study, any assessment procedures and the balance of contact and self-directed time 	<ul style="list-style-type: none"> programme outline; syllabus; course leaflet
<ul style="list-style-type: none"> where applicable, opportunities to have their relevant key skills and critical and evaluative skills addressed 	<ul style="list-style-type: none"> initial assessment documents; learning objectives; learner achievement and evaluation evidence (see below); individual learning plans
<ul style="list-style-type: none"> opportunities to produce and collect an appropriate range of evidence of achievement against agreed learning objectives and unanticipated learning gains 	<ul style="list-style-type: none"> portfolio of work including course handouts; performances, exhibitions and displays; audio and visual tapes; group or individual learner testimonies; learning diaries; artefacts; photographs; pictures; sculptures; learning outcomes documentation, records of learners' forums
<ul style="list-style-type: none"> opportunities to evaluate individual (or group) achievement against agreed objectives and unanticipated learning gains during the programme (formative) and at the end (summative) <p>NB Very short programmes such as day schools, short courses and Learndirect 'learning episodes' might be exempted from formative review</p>	<ul style="list-style-type: none"> learning outcomes documentation; focus group and learners' forum reports; records of progress reviews; tutor/facilitators' reports; see evidence of achievement above
<ul style="list-style-type: none"> consultation and feedback on the quality of the programme 	<ul style="list-style-type: none"> evaluation documents; focus group and learners' forum reports; recorded discussions; individual learner testimonies; pictorial representations
<ul style="list-style-type: none"> knowledge of the equal opportunities policy (or draft policy), any complaints procedure and relevant health and safety procedures 	<ul style="list-style-type: none"> equal opportunities policy (or draft); statement of complaints procedures; health and safety policy and records of health and safety monitoring
<ul style="list-style-type: none"> use of prior learning in relation to any entry requirements 	<ul style="list-style-type: none"> records of accreditation of prior learning and experience; records of any initial assessment
<ul style="list-style-type: none"> knowledge of progression opportunities including educational and non-educational possibilities and (depending upon the resources of the provider) support in acting upon their choices NB This does not assume that all learners will undertake progression or that courses will necessarily lead to this 	<ul style="list-style-type: none"> course materials; information, advice and guidance records (including interviews with learners, records of visits from and to other providers); tutor's/facilitator's notes; records of links with relevant services and organisations; learning outcomes documentation; learner testimonies
<ul style="list-style-type: none"> access to essential learning resources <p>NB This does not mean that the provider is responsible for supplying these resources</p>	<ul style="list-style-type: none"> course outline; syllabus; pre-course information; lesson plans; purchase orders; texts; handouts; audio-visual tapes; artefacts; toys; art/craft materials
<ul style="list-style-type: none"> appropriate and realistic learning and learner support (provided directly, in collaboration or by referral) 	<ul style="list-style-type: none"> induction programmes and materials; learning agreements; timetables for organising additional learning support; records of any referrals; curricula vitae of staff providing additional support; records of any arrangements (including monitoring) for dependant care, mentoring, basic skills and language support; access to necessary learning materials

Programme criteria

All providers should demonstrate that their programmes have:

Criteria	Range of possible (not required) indicative evidence
<ul style="list-style-type: none"> • a rationale, aims and objectives 	<ul style="list-style-type: none"> • programme outline; syllabus; course leaflet
<ul style="list-style-type: none"> • an outline curriculum indicating key phases/modules and balance of contact and self-directed time, and lesson plans 	<ul style="list-style-type: none"> • see above; lesson plans
<ul style="list-style-type: none"> • clear stipulation of any entry requirements with a note of how any relevant prior learning might be used 	<ul style="list-style-type: none"> • see above; induction programmes and materials
<ul style="list-style-type: none"> • clear stipulation of any assessment procedures, including any formal initial assessment 	<ul style="list-style-type: none"> • see above; initial assessment documentation
<ul style="list-style-type: none"> • a record of agreed learning objectives 	<ul style="list-style-type: none"> • individual (and/or collective) learning agreements, individual learning plans; statement of agreed learning objectives
<ul style="list-style-type: none"> • clear evaluation methods that include learner self-evaluation and formative (excluding very short courses) and summative evaluation 	<ul style="list-style-type: none"> • learning outcomes documentation; focus group and learners' forum reports; evaluation documents; recorded discussions; pictorial representations
<ul style="list-style-type: none"> • an appropriate range of delivery methods that broadly relate to programme content and the anticipated or identified learning styles of the target group 	<ul style="list-style-type: none"> • programme outline; syllabus; lesson plans; class observation reports; tutor's reports
<ul style="list-style-type: none"> • information about progression opportunities including educational and non-educational possibilities: for example, a more intensive programme at the same level, a higher level programme, movement into employment, or opportunities for voluntary and community activity NB This does not mean that programmes are required to demonstrate that they lead to progression 	<ul style="list-style-type: none"> • course materials; information, advice and guidance records (including interviews with learners, records of visits from and to other providers); tutor's/facilitator's notes; record of links with relevant services and organisations; learning outcomes documentation; learner testimonies
<ul style="list-style-type: none"> • reflected the principles and statements in the equal opportunities policy: for example, in terms of programme content, delivery, support, evaluation and support for progression 	<ul style="list-style-type: none"> • all the above documentation; equal opportunities policy (or draft) and monitoring and evaluation materials
<ul style="list-style-type: none"> • appropriately qualified/skilled and experienced staff 	<ul style="list-style-type: none"> • curricula vitae; references; staff records
<ul style="list-style-type: none"> • essential learning resources NB This does not mean that they are responsible for supplying these resources; this might rest with tutors or learners 	<ul style="list-style-type: none"> • course outline; syllabus; pre-course information; lesson plans; purchase orders; texts; handouts; audio-visual tapes; artefacts; toys; art/craft materials
<ul style="list-style-type: none"> • appropriate and realistic learning and learner support (provided directly, in collaboration or by referral) 	<ul style="list-style-type: none"> • induction programme and materials; learning agreements; timetables for organising additional learning support; records of any referrals; curricula vitae of staff providing additional support; records of arrangements (including monitoring) for dependant care, mentoring, basic skills and language support; access to necessary learning materials

Provider criteria

All providers should demonstrate that they have:

Criteria	Range of possible (not required) indicative evidence
<ul style="list-style-type: none"> the capacity to deliver the proposed programme, including appropriate staffing and resources 	<ul style="list-style-type: none"> audit report or financial statement; self-assessment report and development plan; LSC provider review and ALL inspection reports; staff and management records
<ul style="list-style-type: none"> an appropriate staff recruitment policy 	<ul style="list-style-type: none"> staff records; policy statement; equal opportunities statement and monitoring records
<ul style="list-style-type: none"> a clear method for identifying and agreeing individual (and/or group) learning objectives 	<ul style="list-style-type: none"> individual (and/or group) learning agreements; individual learning plans; statement of agreed learning objectives; pre-course questionnaires
<ul style="list-style-type: none"> a clear method for identifying and assessing individual (and/or group) achievement and for monitoring and responding to the outcomes within a quality improvement strategy 	<ul style="list-style-type: none"> learning outcomes records; initial assessment records (as appropriate); reviews of learners' achievements; evidence of achievement (see Learner Criteria, page 12); self-assessment report and development plan; strategic plan; records of quality assurance committees; staff development and training plans and materials
<ul style="list-style-type: none"> internal validation of, or commentary upon, learners' self-assessment of their progress and achievements 	<ul style="list-style-type: none"> tutor's/facilitators' reports; class observation reports; mentors' comments; other internal quality review reports
<ul style="list-style-type: none"> a clear method for identifying learner satisfaction and for monitoring and responding to the outcomes within a quality improvement strategy 	<ul style="list-style-type: none"> evaluation documents; focus group and learners' forum reports; summaries of learners' views; self-assessment report and development plan; strategic plan; records of quality assurance committees; staff development and training plans and materials
<ul style="list-style-type: none"> a system for obtaining, storing and collating performance data and for responding to the outcomes within a quality improvement strategy 	<ul style="list-style-type: none"> Individual Learner Record database, self-assessment report and development plan; strategic plan; targets; monitoring records
<ul style="list-style-type: none"> benchmarked performance data against national/local statistics for comparable provision NB This is dependent upon training and the development of appropriate benchmarks 	<ul style="list-style-type: none"> Individual Learner Record database; targets; benchmarking data; quantitative analyses
<ul style="list-style-type: none"> the capacity to ensure the availability of essential learning resources NB This does not mean that the provider is responsible for supplying these resources 	<ul style="list-style-type: none"> course outline; syllabus; pre-course information; lesson plans; purchase orders; tutors' lists of required texts and materials; links with libraries, health education and museum services, etc; tutor/curriculum networks

Criteria	Range of possible (not required) indicative evidence
<ul style="list-style-type: none"> the capacity to meet an appropriate and realistic range of learning and learners' support needs directly, in collaboration or by referral 	<ul style="list-style-type: none"> induction programme and materials; learning agreements; timetables for organising additional learning support; records of any referrals; curricula vitae of staff providing additional support; records of any arrangements (including monitoring) for dependant care, mentoring, basic skills and language support; access to necessary learning materials; policies relating to adults with learning difficulties or disabilities; outcomes of any consultation processes with learners on the quality of support
<ul style="list-style-type: none"> the capacity to signpost learners towards appropriate information, advice and guidance, to arrange for this to be available, or to provide this internally, depending upon the resources of the provider 	<ul style="list-style-type: none"> information, advice and guidance records (including interviews with learners, records of visits from and to other providers); tutors'/facilitators' notes; records of links with relevant services and organisations; learning outcomes documentation; learner testimonies
<ul style="list-style-type: none"> an offer of enrichment activities, for example, visits to events, performances and exhibitions, and opportunities for social contact NB This would depend upon the interests of the learners and the resources of the provider 	<ul style="list-style-type: none"> management committee records; learner committee records; learner satisfaction records; programmes of activities; photographs; audio-visual tapes; exhibitions; publicity materials
<ul style="list-style-type: none"> an appropriate equal opportunities policy and monitoring and review procedures or evidence of working towards this 	<ul style="list-style-type: none"> policy document (or draft); minutes of management meetings; self-assessment report and development plan; strategic plan; staff training records; targets; data on learner recruitment, retention and achievement disaggregated according to gender, ethnicity and disability; local community profiling
<ul style="list-style-type: none"> quality assurance systems 	<ul style="list-style-type: none"> quality assurance policy and record of systems and procedures; self-assessment report and development plan; LSC provider review and ALI inspection reports; evaluation and review documentation; records of quality/steering group/ management committees; data on achievement of performance targets; learners' testimonies; partners' testimonies; external quality framework documentation e.g. PQASSO or Quality First
<ul style="list-style-type: none"> a statement of learner entitlement and responsibility 	<ul style="list-style-type: none"> available statement



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NIACE, the national organisation for adult learning, has a broad remit to promote lifelong opportunities for adults. NIACE works to develop increased participation in education and training. It aims to do this for those who do not have easy access because of class, gender, age, race, language and culture, learning difficulties or disabilities, or insufficient financial resources.

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