



ENABLE Scotland

Putting Learners at the Centre: Delivering our Ambitions for Post-16 Education

Consultation Response

December 2011

Introduction

ENABLE Scotland is the largest voluntary organisation in Scotland of and for children and adults who have learning disabilities and their families. We have a strong voluntary network with around 4000 members in 52 local branches as well as 500 national members throughout Scotland. Around a third of our members have a learning disability. ENABLE Scotland campaigns to improve the lives of people who have learning disabilities and their families and carers.

Our response to this consultation is centred on the needs of people who have learning disabilities, their families, employers and the wider community. Further education is an important part of the lives of people who have learning disabilities. The Scottish Government's review of services for people who have learning disabilities, "The Same as You"¹, emphasised that "well-planned learning opportunities can have significant and long-lasting effects. They can improve the quality of life for people with learning disabilities and can help them to take advantage of other activities and employment. They can also help them to develop independent living skills so that they rely less on others."

People who have learning disabilities across Scotland are already experiencing significant reductions in the provision of college courses. Recent research carried out by the Scottish Consortium for Learning Disability, "If I don't get a place next year, I don't know what I'll do"², revealed a cut in part time places for people who have learning disabilities of 34% over the last year. These changes have, in many cases, been introduced at short notice and with little consideration for the future of the student.

Cuts to college courses will have a disproportionate impact on the lives of people who have learning disabilities, for whom college often provides a crucial opportunity to develop independent living skills, build friendships and develop skills for employment. Only 3.7%³ of people who have learning disabilities in Scotland are known to be in open employment. We are concerned that cuts to college provision could further undermine the ambition of people who have learning disabilities to enter the labour market.

¹<http://www.scotland.gov.uk/Resource/Doc/159140/0043285.pdf>

²http://www.sclld.org.uk/sites/default/files/if_i_dont_get_a_place_sclld_joint_briefing_101011.pdf

³http://www.sclld.org.uk/sites/default/files/2010_esay_statistics_release_-_learning_disability_statistics_full_report_with_annexes.pdf

College cuts are also likely to result in an increased demand for other services, for example local authority provided day services, which are unlikely to be met in full due to the financial pressures currently placed on local authorities. Ultimately, it is likely that this will increase the pressure on parents, carers and family members to provide support during the day.

ENABLE Scotland's has demonstrated over the past 20 years of delivering employment services and projects that people who have learning disabilities can contribute enormously to our society if they are given the opportunity to do so. Our Transitions to Employment project is funded by the Big Lottery to help people who have learning disabilities make the transition from college to employment or training for employment. Since 2009, the project has been working with 382 people and achieved 144 position outcomes, with 54 jobs. Other positive outcomes have included training and apprenticeships.

Responses to Consultation Questions

2. Efficient, flexible learner journeys

How can we ensure delivery of an appropriate place in post-16 learning for all 16-19 year olds? What are the priority actions?

ENABLE Scotland believes that the current system for people who have learning disabilities is too often geared towards achieving **any** positive destination instead of the **right** positive destination. We believe that better transitional planning for all young people, outlining the options that are available to them, can help them to make better, more informed choices about their future. ENABLE Scotland already offers this support to the young people we work with. However, schools and careers services need to develop these skills as well.

Greater clarity and understanding of the role of other delivery partners is also vital. Schools and Further Education colleges must look to partner with third sector organisations to offer a wider, and more effective, portfolio of training and a more successful transition for those leaving school/college – particularly in light of the significant cuts to college courses currently being experienced by people who have learning disabilities.

Some of the programmes delivered by Skills Development Scotland, such as Get Ready for Work, have not been specifically tailored to meet the training requirements of young people who have learning disabilities. Whilst organisations like ENABLE Scotland offer a significant level of specialised training and employment support, there are a large number of young people across Scotland not receiving focussed support to achieve the positive destination that is right for them. We believe that a new training programme is required which is specific to the requirements of young people who have learning disabilities.

Additionally, there is currently a lack of provision for employability skills development for those with significant learning needs, and an increased focus on fixed period of funding will reduce this further. We strongly feel that protection should be given to provision that maximises the learner's chance for progression whilst delivered at a pace that meets their needs.

We recognise the drivers for focusing on the 16-19 age group in the current financial climate. We believe that there must be strong incentives for employers to work with young unemployed people to support them into their first jobs. However, the Scottish Government must also consider the likelihood that this commitment will divert money away from older learners, many of whom are people who have learning disabilities, and the potential implications of this.

In considering the proposed package of measures for improving the learner journey, where should the focus be to improve pathways for all learners? What actions are required to make progression more coherent for learners?

Some schools have developed close and beneficial links with local businesses and third sector partners to give their pupils a wider experience of work. This raises ambitions much earlier and encourages more young people who have learning disabilities to enter vocational training or work after leaving school. However, each school manages its resources differently and a school with good links and innovative practice can be just a few miles away from a school which is isolated and with limited employability activity. We would like to see further facilitation of practice sharing amongst schools, with links to local business and third sector partners being encouraged without impacting on the school's teaching resources.

To improve the learner journey for young people who have learning disabilities, all pupils should have an agreed progression before they leave school. This should take the form of outcome based support planning, involving families and others, followed by regular and robust reviews to ensure the learner remains on track and the original goals are still in focus. We believe that all delivery partners and potential delivery partners should be involved at the planning stage.

We would welcome a mentoring scheme (as originally proposed in Building a Smarter Future⁴) which includes people who have learning disabilities who are working and could advocate the benefits of employment to young people and their circles of support. The "Employment Champions" project⁵, developed by the Scottish Consortium for Learning Disability, is a good example of this.

Many people who have lost their college place over the last year have not been presented with options for the future and as a result do not know what

⁴ <http://scotland.gov.uk/Resource/Doc/335256/0109656.pdf>

⁵ <http://www.sclcd.org.uk/information/employment/employment-champions>

they can do next to replace their college course. We would like to see colleges develop their partnership working during the term, informing young people and college staff about a wider range of options available to students after college. This would allow the young person and their supporters to make an informed choice as to their next steps when the time came to leave college.

3. Widening Access to Post-16 Learning

What do we need to do to ensure the Government's commitment, through Opportunities for All, to post-16 education and training for all 16-19 year olds is delivered to more vulnerable young people? What are the priority actions?

We recognise the drivers for focusing on this age group in the current financial climate. We believe that there must be strong incentives for employers to work with young unemployed people to support them into their first jobs. However, the Scottish Government must also consider the likelihood that this commitment will divert money away from older learners, many of whom are people who have learning disabilities.

Employability must be on the agenda for all young people when thinking about their future. We believe if people are not thinking about having a job as part of their future, they will also rule out the possibility of taking a Further Education place based on that outcome.

With this in mind, we believe that attendance at college should be linked to clear goals and employment pathways. This requires more joined up thinking between schools, colleges, employability agencies, Community Planning Partnerships in each local area.

This year we have seen examples of colleges persuading people who have learning disabilities not to leave college and enter employment because it puts their own course at risk of losing funding. Greater flexibility is required within college funding regimes to ensure that there is more of a focus on working with external organisations to focus on the skills required to enable more young people into employment.

Proposals in the consultation document for an increased focus on partnerships with external organisations will require clarity about roles and responsibilities to ensure partnerships can develop without issues of territoriality.

The majority of employability courses for people who have learning disabilities do not contain a work experience element. This is often encouraged in the student's own time. Our experience is that the most effective vocational training is a mixture of classroom-based activity and work experience. However, funding is based mainly on hours spent in the classroom. Relaxing these restrictions should be considered and colleges should not be penalised for models that result in positive outcomes.

Additionally, a greater focus on young people in care is required. At present, the outcomes for this group are very poor. A lot of young people who have learning disabilities are in care and are at a double disadvantage.

What more could the Government and its delivery partners do to improve retention and progression, building on Opportunities for All?

Colleges need to be aware of local labour market demand and tailor courses to take this into account. There is evidence of a disconnect between a lot of the areas that colleges are training in and the actual employment landscape. As a result, large numbers of young people are being trained in sectors of employment where there are no jobs. This can have a negative impact on the future job expectations of the young person when they realise that employment in their preferred area is not possible. Additionally, it damages the reputation of the college. We believe that colleges should engage more with local businesses to ensure that their programmes reflect the job market they are looking for.

In future, many young people leaving school across Scotland will, through Self-Directed Support, be eligible for a sum of money for the first time – choosing the services that they want to live their lives. We feel there should be an equal focus on employability skills development in the planning undertaken and the portfolio of provision offered through self-directed support.

ENABLE Scotland recognises that work placements can help people to learn the skills they require. In future, better partnership working is required with employers to support work placements. This could include funding employers to provide these placements. Voluntary organisations, including ENABLE Scotland, can help the Government to facilitate work placements and employer engagements.

Young people themselves are the best people to say what works and does not work. We believe that there should be further discussion with young people to inform future strategies for retention and progression.

How can we maximise the contribution of Community Learning & Development to widening access? What examples of good practice can we build on?

We believe that Community Learning and Development should continue to focus on “broad brush”, entry level work with adults – rather than widening access.

4. Aligning Non-Advanced Learning and Skills with Jobs and Growth

What are the advantages and disadvantages of prioritising investment in learning and skills which support jobs in key and high participation sectors?

Advantages:

- Provides a good skill base for growth areas and drives progression into jobs. There is a strong case that this will improve overall economic growth
- Training is outcomes focussed with a clear route to paid jobs

Disadvantages:

- This model can be slow to respond to opportunities and potential changes in requirements.
- Can also place too great a focus on certain sectors at the expense of “less fashionable” and those who are unable to access the learning required thus creating tension with the concept of opportunities for all.
- Exclusion for those students with highest support needs and a move away from training in core skills such as retail, service sector, care etc.

How do we best target our resources in support of jobs, growth and life chances? For example, should we focus on level of qualification, age groups or labour market status?

At present, very few disabled people across Scotland are involved in modern apprenticeship schemes. This must be rectified in the near future to ensure disabled people receive the same opportunities.

Whilst the Scottish Credit and Qualifications Framework (SCQF) is recognised internationally for continuous development, for people who have learning disabilities there is a clear disparity between the qualifications they have gained and the skills they have that will allow them to lead meaningful lives and participate in their communities.

We believe that resources should be focussed in a person-centred way towards young people who have learning disabilities in school. This allows them to develop their skills and ambitions, engages their families and carers and supports them away from a life under the shadow of benefits.

We believe that qualifications are a by-product of getting a youngster “job ready”. Whilst we welcome accreditation for this function, we do not think that resources should be targeted based on the level of qualification. Often employers are looking for someone who is reliable and trustworthy, rather than having a significant level of qualifications.

Do we have the right systems and structures in place for articulating employer needs (locally, regionally and nationally) and those of the wider economy?

Engaging with employers at a level that is effective on a large-scale is a significant problem for agencies that support people who have learning disabilities into work, as it is for other training agencies. This engagement is not the best use of limited resources and has resulted in a landscape of competition and inequality amongst training providers – which ultimately denies opportunities for people.

We don't believe that the current system appropriately articulates employer needs. Employers have raised concerns in recent years about low literacy and numeracy standards. However, systems have yet to be put in place that properly address this.

The third sector has significant experience of engaging with those furthest from the labour market. We believe that a representative system that recognises the third sector would go a long way to supporting employers engagement with those furthest from the labour market.

We would welcome models that increase engagement with trade bodies, widening access to employers in a way that is mutually beneficial for agencies and employers and provides opportunities for all – irrespective of their size or structure.

Which of the existing structures are effective and could be applied more widely; which are ineffective and can be improved?

We agree with proposals to extend Activity Agreements within the consultation document (Page 24, Section 59). Activity Agreements are an effective way of engaging young people at risk of leaving school without a positive destination. However, often More Choices More Chances (MCMC) teams are overwhelmed with referrals that have social and emotional barriers and so there is an increased skills set around supporting these vulnerable young people.

There are some positive examples of partnership with MCMC teams to deliver Activity Agreements for young people who have learning disabilities, and we would suggest more discrete commissioning of Activity Agreements based around profiles of clients is more productive than a 'one size fits all' approach.

Employability pipelines have been established all over the country in Community Planning Partnerships. However, there is no pipeline for people who have learning disabilities. This is a gaping hole in this provision and a proper assessment must be completed to ensure that they are offering opportunities for all.

How can we maximise the contribution of community learning & development to improving people's job prospects? What examples of good practice can we build on?

ENABLE Scotland believes that Community Learning and Development should focus solely on the pre-entry, core skills support that they are better at providing. We do not believe CLD should be involved in specialist vocational support. CLD are best placed to act as a potential intervention. If organisations are working with people who require to develop specific skills (such as literacy and numeracy) and there are specific elements that CLD is best placed to deliver they should continue to do so. However, we do not believe that CLD should change to make it compatible. Whilst they have a contribution to make, other services do this job better.

6. Fair and Affordable Student Support Arrangements

Given the financial constraints, should we prioritise an entitlement-based approach or the level of payment each student receives? What other options are there?

Payments should be available to students at a flat rate dependent on attending the college course and meeting the goals set for them. Often people who have learning disabilities are meeting these goals but a job opportunity does not come up. In these situations it is vital to incentivise and recognise student attendance. There are many situations where college places have been taken up by people who do not attend. These resources could be better used elsewhere.

Current funding for DPG 18 and extended learning support is not time bound and colleges can fund students for many years. The Scottish Funding Council's proposals to remove separate weightings for DPG 18 and extended learning support – as contained in their "Proposals for implementing Putting Learners at the Centre"⁶ – will mean there is a greater focus on time. We hope that this will encourage a more outcome based approach in colleges. However, the additional weighting for DPG 18 and extended learning was introduced in recognition of the additional time it may take students with learning disabilities to learn. We have concerns that a focus on time-bound approaches could mean that this time is reduced.

At present, colleges only receive payment if the learner is still at the college in November. This cut off date is too early and does not incentivise the college to continue to keep the learner engaged in the course. Payment should be based on a later cut off date, for example where the learner is still attending college in March.

⁶http://www.sfc.ac.uk/web/FILES/Consultations_JointConsultation/JointConsultationDocument.pdf

How can FE bursaries and EMA be targeted fairly and more effectively?

Bursaries should be targeted in the same way that allowances on Get Ready for Work are organised, for instance programmes awarded based on labour market demand and payment is based on successful engagement on course and the achievement of jobs.

Educational Maintenance Allowance (EMA) is very difficult to access. The application form for EMA is particularly inaccessible for people who have learning disabilities. The lengthy qualification criteria, which requires access to an original birth certificate and proof of earnings, is a time-consuming barrier for most students, not just those who have learning disabilities.

As a result of these difficulties, many people who have learning disabilities miss out on financial support they are entitled to receive – resulting in a lower level of participation and missing out on the independence and money management skills this can foster for people whilst they are in college.

7. Effective and Sustainable Delivery

What are the pros and cons of our proposals for the regionalisation of colleges? Are there other criteria we should consider in determining the optimal regional structure?

ENABLE Scotland has no objections to the regionalisation of colleges as proposed in the SFC's consultation paper⁷. The regionalisation of colleges should allow them to work more cost effectively in future and could strengthen what colleges provide.

The proposals suggest that courses for people who have learning disabilities will still be available in all college buildings. We believe that this is the correct course of action, as independent travel is a barrier for many people who have learning disabilities and continuing to provide courses at every college building would avoid any potential travel difficulties or additional costs.

What more could the Government and its delivery partners do to improve collaboration between post-16 learning, including CLD and employment support services?

Better planning would naturally improve this support. At present, collaboration is not effective because people do not have a good plan or a range of options presented to them. As a result they chose one thing – such as a training provider or a college – and not a variety of interventions from different agencies. If planning were to improve the delivery of this would become more custom-led and customer focused and would give people a chance to use the variety of interventions available, forcing agencies to work together.

⁷http://www.sfc.ac.uk/web/FILES/Consultations_JointConsultation/JointConsultationDocument.pdf

Where partnerships are being encouraged between organisations like schools, colleges and commercial or third sector organisations then this must be properly regulated to avoid the organisations with the most resources or best networks receiving the most referrals.

Whilst collaboration between CLD and employment support services already happens, improving communication between different partners is essential. One manner of achieving this could be to set up local forums to encourage a level of understanding of what different partners bring to the table and how others can support this. Employability pipelines have been effective at achieving this kind of approach.

The Careers Service does not presently meet the aspirations or needs of students who have learning disabilities. We believe that there is role for skilled people to learn what employment is available in their local area and help young people to plan with this in mind. That would naturally create partnerships and would better meet customer's expectations.

8. Simplification of the funding system and income generation

In what circumstances would it be appropriate and fair to expect people to pay for their learning?

We would argue that expecting people who have learning disabilities to pay for their courses is not necessary, as a reconfiguration of the existing resources could improve the outcomes of these courses.

Learning should be driven by the outcomes it achieves, which it currently is not for many people who have learning disabilities. If people who have learning disabilities are asked to pay for these services in future they are likely to demand a better standard than they currently receive.

What are the advantages and disadvantages of pooling funding for pre-employment support? What lessons can we learn from examples of pooled funding elsewhere?

There are a number of advantages including possible economies of scale and the creation of a one-stop shop that identifies and addresses needs.

However, our experience in this area suggests that people often do not get what they individually need from pooled funded for pre-employment support. Some providers will attempt to fit people to meet their service rather than changing their service to meet the individual's requirements. This is not a very customer focussed approach.

People who have learning disabilities are not well served by this model. We are aware of instances of organisations who do not have a great deal of knowledge of the support needs of people who have learning disabilities, who nonetheless attempt to continue providing this service. We do not believe that people who have learning disabilities are well served by these organisations.

In our experience, many people who have learning disabilities will not attend pooled pre-employment support if there are other client groups in attendance. Where this has been tried it has often led to bullying or a poor level of service where people who have learning disabilities have not been able to learn at the same pace as others. ENABLE Scotland believes that providing people who have learning disabilities with a menu of options and choices would better enable them to overcome some of the barriers they face.

9. Performance, Governance and Accountability

Given the proposed changes to post-16 provision (non-advanced learning and skills) and delivery set out in this document, what are the key considerations for governance?

Just over one third of college attendees across Scotland go to college to attend a non-recognised course which colleges are not required to report against what they have learned from attending these courses. We are concerned that this is not an effective way of ensuring that positive outcomes are achieved for people who have learning disabilities.

Employers should have an opportunity to have an input into the design of different services and programmes to ensure that colleges are actually producing the skills that employers are looking for.

Skills Development Scotland contracts are awarded in consultation with Community Planning Partnerships, with an input on what the economic needs of the area are. Whilst this needs improvement, this could be a good model to follow.

What measures should form the basis of our performance management framework for colleges and training providers in order to improve outcomes for all learners?

Where colleges are running courses and the main objective is to get people into work, we believe that these courses should be measured on the number of people they get into work.

At present this is not the case and colleges are incentivised to keep people on rather than finding appropriate employment places. This year we have seen examples of colleges persuading people who have learning disabilities not to leave college and enter employment because it puts their own course at risk of losing funding. We believe that this is an unacceptable situation, encouraged by the way in which funding is structured. We believe that moving the funding to the end of these courses would improve outcomes for people who have learning disabilities.

Colleges and training providers currently carry out very little tracking or follow through with people who are leaving the colleges. ENABLE Scotland believes that colleges should be required to carry out proper tracking of leavers for up

to 12 months after they leave the college and that this information should be made publicly available.

How do we ensure a strong focus on improving outcomes for those furthest from the labour market? What are stakeholders' experiences of this?

It is vital that people who are far from the labour market are not automatically written off because of this. Employment progression must be the aim for everybody, even if it requires some cultural shifts to achieve it. Specialist support should be available from stakeholders, colleges and training providers to encourage this and additional funding or incentives may be required.

Programmes should reflect the different starting points of clients. Those furthest removed from the labour market should have different criteria, for example achieving a work placement may be a more realistic goal in the short term than getting a job.

There is currently too much of an emphasis on the requirement to carry out 16 hours of work a week in Skills Development Scotland programmes. This can be a high barrier for people who are furthest from the labour market and they may not be able to sustain this number of hours a week. However, it should be recognised if they can work fewer hours a week initially and then build on that.