



Leading learning and skills

Response

to the Green Paper:

Youth Matters

About the Learning and Skills Council

The Learning and Skills Council (LSC) exists to make England better skilled and more competitive – and that starts with young people. We are responsible for planning and funding high-quality education and training that helps young people realise their potential.

We work with employers, colleges and other government agencies to ensure the training opportunities available to young people are real and relevant, and that they understand what funding and support they are entitled to.

From Young Apprenticeships to Education Maintenance Allowances to Skills for Life (Basic Skills), the LSC underpins a wide range of programmes to help young people stay in learning.

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Introduction

General

1 This response was developed in consultation with the 47 local Learning and Skills Councils as well as the national Council, providers and other stakeholders in the education and training of young people. The response was considered and strongly endorsed by the Council's Young People's Learning Committee at its meeting on 10 November 2005. We will want to work with the Department for Education and Skills to overcome the serious concerns we express in this response.

2 The Learning and Skills Council (LSC) recognises how the proposals in the Green Paper *Youth Matters* can contribute to the achievement of the proposals in the Green Paper *Every Child Matters*. We support the general direction of travel described in the Green Paper, without underestimating the challenges of translating vision to practice. In particular, we strongly support local delivery of young people's entitlements against national standards and robust accountability measures.

3 In developing this response, the two key principles which we have borne in mind have been, first, whether the proposals are in the best interests of all young people, and secondly whether the proposals will assist us in implementing Government policy through the aims and objectives set out in the national Council's Corporate Plan and local Councils' Strategic Plans.

4 The members of the national and local Councils are drawn from a wide range of interests, including employers, schools, further education, work-based learning and local authorities. The discussion, therefore, and meetings of those Councils will have covered the wide range of issues raised in the Green Paper, and given the wide interdependence and impact of different roles and responsibilities.

5 The Green Paper includes a number of proposals, of varying size and complexity, but all about better serving young people. There is a potential danger that the individual proposals themselves will not offer a sufficient incentive to existing deliverers; we would urge consideration of putting some, or all, of the available funding together.

6 We do not underestimate the scale of the challenges which are set by the Government's proposals for the reform of 14-19 education and training, but we recognise the need for reform, and look forward to working with the DfES, local authorities and other parties to make the vision a reality. We are confident that this is achievable, not least because the Green Paper includes so many examples of existing good practice, upon which we can build.

7 Through our work with young people, we have observed that a number of barriers to their progress and participation exist purely as a consequence of different age "boundaries" that apply to different legislation and to different

organisations' policies. We strongly recommend that the benefits and exclusions that apply at different stages throughout teenage years to age 25 are reviewed and assessed for their impact on young people's attainment and progression.

8 The Green Paper, in our view, does not give full weight to the difficulties some young people face in engaging with the system: not all young people have access to, or choose to access, the internet; disengagement with the school system begins before 16 for a significant number of young people; many young people at 16 enter employment; information, advice and guidance (IAG) in minority languages, for the disabled and those with learning difficulties; teenage pregnancy; and young offenders – which, in particular, we consider in more detail below.

9 Neither does the Green Paper appear to recognise the significant regional differences in the circumstances of young people. For example, if home-ownership is taken as one aspect of economic well-being, that may be significantly more difficult to achieve for a young person in London than in other parts of the country.

10 The area which gives us the greatest concern – and which we have raised in our responses to previous consultations – is that the success of the 14-19 reform depends on ensuring that young people and their parents or guardians have access to IAG which is impartial and of high quality. There is a particular problem in ensuring that young people have informed and impartial IAG about vocational routes. Again, there are examples of where this is happening, but there are too many examples of where it is not happening. Unless what is best practice currently becomes common practice, we will have failed. Recent inspection reports of Connexions have demonstrated the substantial progress that has been made in the last year; it is essential for that progress to be maintained during transition to new arrangements. We remain concerned that, as the National Audit Office reported, Connexions Partnerships have not been resourced at anything like the level envisaged initially to enable the delivery of a universal service; if the new arrangements are to operate effectively, additional resources will be needed.

11 A key part of information, advice and guidance for young people is that they are properly assessed – and given the correct teaching and guidance – in understanding who they are and what their aspirations are, as a basis for personalising the information, advice and guidance they receive. It is important, also, to recognise that, in order to make informed choices at 14, young people will need significant IAG before that age.

Young Offenders

12 We have a specific interest and concern about the support available to young offenders, and it may be helpful to group our comments here, rather than on a piecemeal basis throughout the response.

13 Overall, we feel the Green Paper is inconsistent and unhelpful in its references to young offenders. Of course, young people must not be allowed to disrupt the activities of other young people, but it is important to bear in mind that those young people will already have been "punished" by the courts, through a range of community or custodial sentences. They should not be further punished by having benefits or opportunities withdrawn from them.

14 Indeed, it would have been helpful if the Green Paper had acknowledged that youth offending is very often an indication of disadvantage, deprivation and a lack of facilities and opportunities to become involved in positive activities.

15 It would be helpful to make clear what opportunities and provision there will be for young people in custodial provision away from their home area. In particular, the role and responsibility of the Youth Offending Team, and its relationship to the Children's Trust, should be clarified. We are also particularly concerned about the provision of learning for young people held in secure training centres and local authority secure children's homes.

16 There are examples of good practice which might be worth highlighting, such as HMYOI Werrington's work with a local football club, the Samaritans' work with young people in HMYOI Swinfen Hall to provide peer support and the "Toe-by-Toe" peer support reading scheme in HMYOI Brinsford.

17 Our Offenders Learning and Skills Team would be happy to discuss these issues in further detail with officials.

1: Vision, Challenges and Principles

LSC Response

1.1 A key principle of reform must be the recognition and respect for the diversity of young people. The Green Paper appears to see young people – teenagers – as a homogenous group, whereas, in practice, an individual young person will identify with one, or more, individual interest groups. In addition, a young person may change their loyalties to particular groups at any time.

1.2 It is important to bear in mind constantly, as these proposals are developed, that some young people are still children, whilst some are much more mature – indeed, some will have children of their own, and many will be engaged fully with the adult world. The Green Paper does not reflect this, nor does it reflect the barriers young people face in accessing experiences and opportunities, through such things as gender, sexuality, ethnicity, religion, learning difficulties and/or disabilities, or living in rural or urban communities.

1.3 There is a constant danger that we – adults – think that we know what is good for young people. It is not enough to listen to young people, they must be centrally involved in developing proposals. We recognise our own deficiencies in this respect, and will be working to involve young people more in our decision making, locally and nationally.

1.4 There is a danger that involving young people is no more than tokenism; however, there are already successful examples of young people's forums feeding into the work of Connexions Partnerships, and we are encouraging local LSCs and local authorities to involve young people in the design of web-based 14-19 prospectuses, in order that the sites are attractive to young people.

2: Empowering Young People

LSC Response

2.1 The award of the 2012 Olympics and Paralympics to London presents us with unprecedented opportunities to enthuse and engage young people, over the next seven years and beyond. The legacy of a successful Games will last for a generation and more, and the Council, through its London region, is working already to help ensure a successful Games.

2.2 At a time of such excitement, it is disappointing that twice in the summary of these proposals reference is made to applying sanctions, suspending or withdrawing opportunities; this may give the impression that these opportunities are a privilege for young people, rather than an entitlement. We object strongly to that interpretation. We do not expect young people to be grateful to us for providing opportunities, rather we should feel collective shame that we have not provided sufficient high quality facilities and opportunities in the past.

2.3 Whilst we recognise the thinking behind the proposal for the 'opportunity card', we are uneasy about the messages which are sent out by the State using market mechanisms in an attempt to address social issues. Regardless of that unease, we have concerns about the proposal in operation. We are not convinced that teenagers, and those under 16 in particular, are familiar with the concept of a 'loyalty card'. We are also concerned that such an initiative will not achieve its objective of increasing participation in 'positive' activities, particularly by disaffected, disconnected and hard to reach groups within our communities. We note that the national evaluation of the Connexions Card found that, whilst there were some positive outcomes, the initial aims for functionality and scale of activity had not been realised, and in addition, access and usage tended to be from the more highly qualified and easier to reach young people (DfES Research Report RR614, January 2005). We believe that the funds required to develop and manage the opportunity card might better be used to enhance existing services.

2.4 We welcome the proposal to establish an 'opportunity fund' to be spent at young people's discretion. The challenges will be to show trust in young people, and to be wary of setting 'adult' limits on that discretion. The emerging Youth Councils/Parliaments could be one means of involving young people in decision making, and the resource allocation and spending process.

2.5 Clarification of the roles and lines of accountability is welcomed, but we would urge that any legislation is enabling, opening up new opportunities, rather than restrictive, leading to existing opportunities being withdrawn. There is always a danger that a 'duty' will be interpreted as a 'sole responsibility'.

2.6 We welcome the proposals for a new set of national standards for positive activities, and trust that these will be developed in such a way as to be transparent to young people. National standards should make clear the opportunities to which young people are entitled; explain clearly when that entitlement will be in place; and set out what actions young people can take if they feel the standards are not being met in their local area. There may be a danger of national minimum standards becoming national norms, which might mean a reduction in opportunities in some areas. We would urge that the national standards are specific, and are set to reflect at least the best current practice.

2.7 On youth work, we prefer the notion of ‘transforming’, rather than ‘re-invigorating’. The interests and aspirations of today’s and tomorrow’s young people are radically different from those of the past, and the challenge is to provide an offer that is relevant to today’s young people. That offer should, where appropriate, offer the opportunity for accreditation. Again, there are many examples of excellent practice, such as the recently launched Arts Council Arts Award and the ASDAN Certificate of Personal Effectiveness, although these are often restricted by lack of resources and funding.

2.8 The Green Paper acknowledges that £40 million is a relatively small amount when spread over all local authorities; nevertheless, we believe that this will provide the seed-funding for far higher investment by both the public and private sectors. Whilst we would encourage flexibility and creativity to meet local needs, we wonder whether some guidance might be helpful, perhaps analogous to the planning guidance on affordable housing – such that residential or commercial development or re-development had to provide a range of facilities for young people.

3: Young People as Citizens

LSC Response

3.1 Many young people contribute already to their communities, both in structured activity and through their own initiative. However, we welcome the development of a more structured approach, which will have the benefit of supporting young people and identifying opportunities, and in particular to the commitment to take forward the recommendations of the Russell Commission on volunteering. In taking forward the Green Paper, we would recommend the broader concept of young people contributing to community cohesion, rather than the narrower concept of volunteering.

3.2 The Green Paper focuses strongly on sport and on local authority provision, and does not, perhaps, give sufficient weight to the expressive and creative arts, or to voluntary and faith organisations. Faith organisations, in particular, offer a route to engage with large numbers of young people, and also can provide those young people with opportunities to become involved and contribute.

3.3 The LSC has been actively engaged in the Post-16 Citizenship Development Programme, which the DfES put in place following the report of Sir Bernard Crick's working group. The projects supported by that programme have been varied, including young people in work as well as those in education, and have demonstrated the rich variety of activities which can be undertaken, as well as identifying potential pitfalls, resource implications and staff development needs. The evaluation of that programme identified a number of key factors in developing innovative approaches to active citizenship, which we would support as equally suitable underpinning principles for volunteering:

- a flexible, yet rigorous framework
- a clear definition of what citizenship means
- dedicated and enthusiastic staff with sufficient resources
- an emphasis on combining knowledge, understanding and skills with practical action
- involvement and participation of young people (DfES Research Report RR604, December 2004).

3.4 Many – perhaps most – young people would welcome formal recognition of their voluntary, or paid, work. Whilst we understand why the Government was not convinced that the case had been made for a general diploma at level 3, one consequence of that decision is that those young people pursuing predominantly the AS/A2 route will not be entitled to expect their school or college to ensure access to such activity. We would urge Government to re-consider that decision.

3.5 One significant barrier to participation in youth activities and volunteering is the availability, and cost, of transport. Even though this is a Green Paper it does not, in our view, address this issue sufficiently.

3.6 We are not convinced that there are suitable and sufficient opportunities for all young people, in all areas. We have serious concerns about the capacity of schools, colleges and other agencies to fund, deliver and support these wider activities without additional and significant investment. Equally, however, there may some areas of the country where the proposals in the Green Paper might disadvantage existing voluntary, and effective, networks, perhaps by subsidising new providers to a greater extent than existing providers.

3.7 The Green Paper expresses a desire that all young people should volunteer and contribute to their communities. We would not depart from that position, but would ask for recognition that some young people do contribute significantly, for example providing support within their own or their extended family. Some young people, however, see that as a private matter, and would not necessarily wish it to be recorded formally: a consequence of this may be that, for some of those young people, their personal, and valuable, commitments may not leave time for engagement with the formal system.

3.8 Finally, volunteering must be both additional, and real. By this we mean that volunteers must enhance existing services, not replace existing, paid, employees, and that the activity should add value commensurate to the effort involved, rather than be activity for the sake of activity.

4: Supporting Choices

LSC response

4.1 This is the part of the Green Paper which gives us the greatest concern. We recognise the tensions that exist currently in looking to provide a service which is both universal and targeted, but do not consider that the case for change has been convincingly argued. Indeed, we have concerns that the proposed changes may result in a less effective service to young people. This is of central importance to the LSC, as we seek to increase the proportion of young people who, by the age of 19, have achieved level 2 (the equivalent of five GCSE passes at grades A*-C) and to reduce the number of young people who are not in education, employment or training (NEET).

4.2 We have commented consistently on the current lack of, and crucial need for, impartial and high quality information advice and guidance. We commented specifically on this in our responses to the consultation on the Framework for Careers Education and Guidance, to the Interim Report of the Tomlinson Working Group and in our contributions to the End to End Review of Careers Education and Guidance. We endorsed the curriculum entitlement to careers education and guidance in the White Paper *14-19: Education and Skills*. We believe that it is fundamental that every young person should have independent high quality IAG as part of the statutory 14-19 entitlement. and would welcome an explicit statement from Ministers that we should work collectively to that end.

4.3 We would re-iterate the need to consider careers education and careers guidance separately, recognising the importance of each, but their essential differences. Careers education has been, and remains, an essential part of the curriculum for all young people, in school or college, but is in urgent need of being accorded far higher status than it has been given to date, including, perhaps, formal recognition and accreditation for those staff involved in its provision. Careers guidance demands similar high-level skills, but crucially requires detailed and up-to-date understanding of the labour market and progression to continued education and employer engagement. We would look for greater emphasis on the importance that young people understand the world of work and appreciate the need to develop skills matched to employers' needs. It is also important that IAG providers engage effectively with employers to identify job opportunities, particularly at local level, and to support vocational options for those aged 14-16.

4.4 The Green Paper does not acknowledge the paucity of the quality of careers education, although this is acknowledged in the End to End Review. We urged that the Framework for Careers Education and Guidance should be statutory; we repeat that plea, but would seek for the document to reflect the difference set out above. Schools and colleges would be responsible for delivering careers education, but would seek expert external support to ensure that careers guidance is truly independent, up-to-date and covers the whole range of opportunities for young people. In addition, the lines of

accountability for IAG need clarifying.

4.5 We also recommended that the Quality Award which is described in the Framework should be a national award rather than a local award judged against national criteria. Again, we would urge that there should be a national Quality Award for Careers Education, Information, Advice and Guidance. Quality standards are essential in order to ensure consistency of provision.

4.6 For our part, many local LSCs have been working with local authorities and Connexions to establish a prospectus of learning and employment opportunities in their local areas, and we are taking this forward as required by the White Paper *14-19 Education and Skills* to ensure that there is national coverage. Some of these local prospectuses already make use of ICT and the web; a particular feature will be the way in which prospectuses developed at local level articulate into broader sub-regional, regional and national prospectuses, which will be particularly important in London and other urban conurbations. We agree that the prospectuses will become the responsibility of local LSCs and local authorities working through the Children's Trusts, once the latter are established. We are also working with the Local Government Association to develop protocols and guidance on good practice between local LSCs and local authorities.

4.7 The proposed new structure for the LSC, which includes the establishment of over 150 strong local partnership teams will enhance the engagement and contribution that the LSC can make to whatever new arrangements are set in place at local level, through active partnership with Children's Trusts.

4.8 We welcome the acknowledgement of the important role that parents and carers play in the choices made by their children, and the need to provide parents and carers with better support. When considering carers, we would place a particular emphasis on the needs of young people in the care of local authorities. We will need to ensure that the joint prospectus is as accessible to parents and carers as it is to young people. Whilst we would envisage the prospectuses being in electronic format as the primary medium, they must also be available to those – young people and adults – without access to that media, and to those with disabilities, learning difficulties, and for whom English is not their first language.

4.9 Whilst it is clearly important that institutions, primarily schools and colleges, are held to account for the success and progression of the young people they enrol, it is not clear who will have responsibility for ensuring an entitlement to, and tracking of, those young people in work or, in particular, for those young people not in education, employment or training.

4.10 We support fully the *Every Child Matters* agenda. The Government has trailed widely the transfer of responsibility for commissioning IAG from Connexions Services to local authorities, working through Children's Trusts, and we do not seek to re-open that discussion. Rather, we would wish to make clear our concerns, in order that we ensure they are addressed in the

transition.

4.11 First, we are concerned that Children's Trusts face a big agenda and, initially at least, may focus disproportionately on the needs of younger children. We are pleased that the LSC was identified in the Children Act 2004 as a key strategic partner of the local authority in the new arrangements, and we will play our full part; however, education and training will be only one of many responsibilities of Children's Trusts, and 14-19 education and training an even smaller part. 14-19 boards, feeding in to Children's Trusts, may enable full and detailed discussion of 14-19 issues, but we will have to remain vigilant to ensure that IAG is given due regard.

4.12 Secondly, and connected, is a concern which was identified by the National Audit Office in its report: *Connexions Service for All Young People* (NAO, 2004), that the Connexions Service had not been resourced at anything like the level envisaged if it was to deliver the service set out in the original prospectus. Even if the concern above is avoided, the resources for IAG transferred to local authorities will remain insufficient to meet the IAG needs of 13-19 year olds.

4.13 Thirdly, we are concerned about the future provision for those young people with multiple and complex needs, who are in need of a high level of support. Connexions Services have made significant progress on work with some specific groups of young people, including children leaving care and young runaways. The expertise which has been developed, and has been shared with other Connexions Services, must not be lost in the transition.

4.14 Of particular concern is the need for continuation of the role currently carried out by Connexions Services in assessing the needs of young people with learning difficulties and/or disabilities aged 16-25. Under section 140 of the Learning and Skills Act 2000, this is a statutory duty of the secretary of state which has been delegated to the Connexions Service. The LSC has a duty to have regard to these assessments in making decisions about funding placements for individual learners under section 13 of the Learning and Skills Act 2000. It is essential, therefore, that there is clarity about to whom the duty to carry out assessments under section 140 will be delegated by the secretary of state. It is also essential that the reports resulting from such assessments are robust and fulfil the statutory duty.

4.15 There also needs to be clarity about the role of those carrying out the assessments – are they advocates for the young person and their parents/carers or providers of independent advice which considers all the options available to the young person post 16. Not only is this role critical currently to the LSC's consideration of requests for funding for young people at specialist colleges for learners with learning difficulties and/or disabilities, it is also pivotal to the LSC's implementation of the recent review of its planning and funding of provision for learners with learning difficulties and/or disabilities across the post 16 sector which was chaired by Peter Little, OBE which envisages provision which is learner centred and delivered collaboratively.

4.16 Fourthly, we have concerns about the proposal that individual institutions could withdraw from local arrangements and deliver IAG themselves. There is substantial evidence of the lack of understanding of many school-based staff about opportunities other than in the school's own sixth form. Further, if a number of institutions in any particular area were to follow that route, it might seriously undermine the provision for the remaining institutions. The proposal that such institutions might be drawn back into the local arrangements raises the spectre of responsibility for IAG "yo-yoing" between different agencies; which cannot be in the best interests of young people. Clearly, any individual organisation (school or College) opting to deliver IAG itself must be able to demonstrate impartiality and high quality. The importance of national standards cannot be underestimated here and we would recommend that Ofsted should pay particular attention to this aspect of provision at inspection, and that School Improvement Partners should explicitly check and challenge schools on the quality and impartiality of IAG.

4.17 Finally, the establishment of the LSC involved the largest public sector transfer of staff under the TUPE regulations, with some 74 separate organisations coming together as one. We learnt many lessons from that exercise, not least of which was the additional complexity of transferring staff and resources from the private sector to the public – the Training and Enterprise Councils were separate companies, as are the individual Connexions Services. Effecting changes to terms and conditions of employment, pensions and pay rates are likely to be significant and time-consuming.

4.18 The transfer may well be easier in the, roughly, half of the Connexions Services which contract out the delivery than it will in those that are direct deliverers, but transferring staff and resources from 47 Connexions Services to 150 local authorities seems likely to be very challenging, particularly if not all the local authorities in an area are ready to take on the responsibilities at the same time. Also, it is possible that, in some areas where the Connexions Service will be distributed across a number of local authorities, there will be a significant loss of economies of scale in some essential support services (e.g. data management, training, tracking young people).

4.19 Whilst the Green paper does not examine the "mechanics" of the operation of a new system, a vital feature must be an effective data management system, supported by clear accountabilities for collecting and collating data and information sharing protocols. We would urge that the work being undertaken through the DfES Management Information Across Partners programme, the DfES' and LSC's *New Measures of Success* programme and the LSC's agenda for change data theme contribute to the design and development of a universal approach to information about (and for) young people -- whether in school, College, training or NEET. It is essential that common standards and definitions are underpinned by effective data management, otherwise we not only at risk wasting resources, but -- more importantly -- risk losing track of young people at vulnerable points in their lives. We must not underestimate the challenges such a data management

system will present.

4.20 The definition of an effective data management system needs to include provision for data entry at the client interface. This appears to have been overlooked. In any transfer of Connexions services' responsibilities and leadership to local authorities the importance of resourcing, training, equipping, managing and scrutiny of these functions needs to be stressed if the forensic analysis of data is to be useful, robust and fit for the purposes of improvement, accountability and targeting young people in need.

4.21 In metropolitan areas the cross-border movement of young people from borough of residence to borough of learning needs to be configured into system design and operations. Guidance and specifications to encompass mobility will be needed if data systems are to transfer to local authorities and should include consideration of the area-wide or region leadership of data functions.

4.22 Whilst outside the scope of the Green Paper, we would draw attention to the fact that in a number of areas the Connexions Partnerships have bid successfully for the contract to deliver IAG to adults. There is considerable concern that, if Connexions Partnerships lose the responsibility for young people, those partnerships will not have the "critical mass" in terms of staffing or expertise to be able to make an effective IAG offer to adults.

4.23 A key part of information, advice and guidance for young people is that they are properly assessed – and given the correct teaching and guidance – in understanding who they are and what their aspirations are, as a basis for personalising the information, advice and guidance they receive. It is important, also, to recognise that the increased opportunities for learning available to young people from 14 carry with them a need for more, and better, IAG before the age of 14; indeed, the introduction of specialisms into secondary schools suggests an increasing need for IAG for young people in primary schools and their parents.

5: Young People Achieving

LSC Response

5.1 We fully support these proposals. One of the most significant achievements of Connexions has been the holistic approach to support for young people, recognising that finding a young person a job, or a place in education or training, is of little use if the young person does not have a place to live, does not have sufficient cash to pay for food, clothing or transport.

5.2 One barrier to achievement by young people – hopefully to be addressed through the Specialised Diplomas being developed under the White Paper: *14-19 Education and Skills* – is a lack of provision at level 1 in some vocational areas.

5.3 The success of these proposals will depend in large part on workforce development, and will require a cultural change for many professionals, who, whilst retaining an expertise in their own specialism, will need to be able to coordinate a package of support.

6: A Reformed System

LSC Response

6.1 We have commented earlier about the challenges which will be faced in the transition to the new arrangements. We fully support the proposals for simplification of the funding regime, and for allowing increased flexibility within a robust accountability framework.

6.2 A key feature of any accountability framework is that the responsible body is identified clearly. Whilst the use of the Connexions brand may be appropriate, it is essential that young people, their parents and carers, and employers and education/training providers are clear that the service is being provided by the local authority, and that the Director of Children's Services is the accountable officer. In other parts of the offer, where responsibility is shared, different partners may take the lead in different areas of the country; however, we would expect that it would be clear, locally, which partner had taken that lead.

6.3 We would urge that the Government is flexible in its ambition for new arrangements to be in place in every area by April 2008. It must be more important that the transition is successful than that it is achieved by a pre-set date, although we would not wish there to be any undue delay.

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