



## Reducing bureaucracy for learners in further education

On 20 March 2009, the National Learner Panel (NLP) worked with Tony Craven (Chair, Bureaucracy Reduction Group), Dan Taubman (Bureaucracy Reduction Group and national official of the University and College Union) and Sue Rogers (Department for Innovation, Universities and Skills) to outline the ways in which members would like to see bureaucracy reduced for learners in further education. A summary of the panel's views is outlined in section 2 below.

### 1. Background and context

Tony Craven, Chair of the Further Education and Training Bureaucracy Reduction Group (BRG), explained to the panel that the BRG scrutinises new and emerging policies and processes being considered or existing policies being implemented by Government or its agencies, with the aim of reducing unnecessary bureaucracy. The BRG listens to the views of colleges, training providers, employers and learners to better understand the impact of policies and how processes can be simplified.

Placing the work of the BRG in context, Tony said *“not all bureaucracy is necessarily bad. If you're spending large amounts of public funds, there is a need for accountability – and any system that is sensitive to the differing needs of individuals has a tendency to be bureaucratic. But it's our job to challenge when systems are causing more complications or duplications than they need to, and to identify ways in which the process can be simplified.”*

The panel worked with the BRG to:

- highlight the day-to-day bureaucracy that members face in their learning environments and develop recommendations for simplification of these processes
- explore members' views on current simplification proposals for the further education and training sector including:
  - the introduction of the Skills Funding Agency with its range of gateways and agencies
  - increased collection, storage and sharing of data between agencies and learning providers
  - the potential advantages and disadvantages of online systems in reducing bureaucracy.

## 2. 'Day to day' bureaucracy in further education

By 'bureaucracy in further education' we mean any process which to us appears more complicated than it needs to be and which consequently has a negative impact on learners. We want to see systems supporting further education that:

- reduce unnecessary duplication
- are responsive to our individual circumstances
- empower us by giving us as much control as possible
- are as simple and accessible as possible.

Unnecessary complexity has reared its head at various stages of our further education experience – from the point at which we initially start thinking about education, through to applying and actively studying.

It can often feel as if there is a 'hunger for data' – both from our providers and from the system in general. We find ourselves filling in forms, often duplicating information we have given elsewhere, and having no idea why we are being asked for it in the first place or where it ends up:

*"It wouldn't be so bad if it was explained to you why you were being asked for the information – but if you're having to provide info, or worse, provide the same info twice, you at least need to understand what it's for and what will be done with it all."*

If we are to feel empowered as learners, we need to understand why particular information is required, what will be done with it – and how we can access and, if necessary, amend it in future.

### **Unstructured and inaccessible information when finding out about courses and funding**

When we are first thinking about the possibility of studying or training, we need to be able to find out which courses are on offer, who offers them, and whether there is funding available to cover the costs – and we need all this to be in straightforward, non-technical language.

*"Especially for those of us who have been out of education for a long time, even the language of bureaucracy can put us off taking that first vital step. You can fall at the first hurdle, if you're not careful."*

*"The way information is structured on websites such as Directgov can be confusing when you're first trying to find out about funding or courses – these sites need to signpost more to other sites, rather than have too much information on them."*

### **Paperwork and data collection overload when *applying* for a course**

Once we have decided to apply for a course or qualification, the amount of information required from us can be overwhelming – and result in unnecessary duplication because the different parties that are asking us for the information are not working together as efficiently as they could.

*"I was asked for some personal information on the phone in the initial stages of my application, and then again on a formal application form. Why can't somebody at the college just keep a record of my details – like you would if I was a customer buying insurance or whatever – and then just use this central database, instead of asking me to fill in the same info time and again? It's so inefficient."*

Also, at the start of the course there tends to be a lot of paperwork – which in itself can be particularly off-putting for those who are returning to education after many years – or who are just learning for pleasure, and so want the administrative process to be as minimal as possible.

*“Colleges could consider spacing out the paperwork – couldn’t it be phased so you’re not overloaded at the start of courses? This can put people off.”*

*“It’s strange there’s still so much emphasis on hard copies of paper in this digital age. Why can’t more of this stuff be done online, if the learner’s OK with using this approach?”*

### **Insufficient tailoring of information**

In some instances, providers are giving learners additional information on course content or assessment criteria that we don’t need.

*“I got given this huge pack of standards for NVQs. You choose 5 out of 30 units – so why couldn’t I just be given the info relating to my particular units?”*

### **Duplication of learner surveys**

We welcome the opportunity to give our views on our courses and more generally on how our providers could improve facilities or ways of working to benefit learners. However, there is a risk of ‘survey fatigue’ if we have to fill in multiple, duplicating surveys over the course of the year. Providers, the National Student Satisfaction Survey, Ofsted and the Learning and Skills Council’s Framework for Excellence all need to work together to make sure that it is an integrated process.

*“You do a learner survey nationally and then one with your provider. The provider should go to one portal and print off reports and share that with Ofsted, so learners don’t have to fill out two sets of forms.”*

### **Issues with Education Maintenance Allowance (EMA) and the Adult Learning Grant (ALG)**

We particularly encounter problems with bureaucracy when it comes to applying for funding, such as the Education Maintenance Allowance (EMA) or the Adult Learning Grant (ALG):

*“The various papers you have to send off are a nightmare. The government sends you paper that you then have to send off to another organisation. The LSC should already know what your household income is by emailing the Inland Revenue, rather than asking the learners.”*

We welcome any proposals to improve the transition from EMAs in further education to student loans or to adult learning grants, and to reduce any duplication here – and we approve of the move, from this academic year, to prevent repeat form filling on an annual basis to receive EMA – but Government will need to work closely with learners to track whether the system really is improving on the ground.

*“When the EMA transfers to ALG, there are two different forms but same format. Why can’t it just transfer over, without learners needing to fill out another form?”*

In addition, we find that the current EMA payment system is not sufficiently responsive when there are changes in students’ circumstances over the course of the year, and the reliability of payment systems at local provider level is patchy.

*“People have to get their forms signed on a weekly basis, so if that person’s ill or they can’t get their form signed for some reason, that can mean learners don’t get their payments on time.”*

### 3. Can technology and e-systems help to simplify the system for learners?

Most of us use technology, online and e-systems to find out about, apply for or study in further education at some stage – but to a greater or lesser extent depending upon our individual learning environments or preferences. Given our concerns about the lack of a joined up approach to collecting and providing information (outlined above), we welcome any systems or approaches that can help to reduce this – and recognise that technology and e-systems (if properly implemented and supported) can potentially play a role in helping to achieve this.

However, whilst we can see that in theory technology and e-systems have the potential to simplify our experience of the further education system, we believe that in practice there are inherent risks. If the system is going to empower rather than disempower us as learners it is critical that:

- i) we know about the data that is being collected about us and shared – and retain some editorial control over what is being shared, when and with whom. This will reassure us about the security of our data
- ii) systems and technologies are accessible to those of us with disabilities (e.g. they are compatible with screen reader software etc)
- iii) learners have sufficient skills and confidence to work with technology – and easy access to it
- iv) the system does not exclude those who, for reasons of personal preference/lack of skills/lack of access, prefer to access information, learning and services more traditionally.

#### E-learning

*“Couldn’t more course materials just be provided online or on a disc? I can’t believe that hard copies of everything are essential any more.”*

Some of the most common and useful systems to support learning that we encounter on a day-to-day basis include Fast Tomato (an online IAG system used in some schools), Blackboard (an interactive e-learning system), Moodle (open source, community-based tools for learning) and eTracker (an application enabling tutors to track students’ performance). In principle, we are very much in favour of the use of online and technology based learning materials where these are being used to enhance our learning experience or provide us with greater flexibility in how/when we learn. However, the use of e-learning systems will not be seen as ‘simplifying the system’ if people don’t have access to, or don’t feel comfortable with using, technology or online approaches.

*“If people can’t or don’t know how to use it, technology-based approaches just feel as if they’re another barrier, another complicating factor for learners. If we’re moving towards using these more, we need proper training and support for everyone – to level 2 in IT.”*

#### E-systems for collecting and sharing information: control over our data

We can see that the online learner records being piloted could reduce the need for us to keep paper copies of all our qualifications, act as a basic CV and perhaps could even be developed to enable us to share predicted grades with potential employers or learning providers.

*“There’s often a frustrating gap while you’re waiting for your results – if the learner record could provide some sort of official record of a predicted grade, it could be useful helping to get a job, or get on to another course.”*

We are aware that the new system for Managing Information Across Partners (MIAP) will enable information to be shared between providers and different agencies. Whilst we can see that this could bring benefits such as a reduction in the number of times we might need to fill in forms, we would still want to be

sure that the collection of any data is essential, as unobtrusive as possible and accurate, and that we have editorial control over and can own the data collected.

If this is not the case, we believe learners may feel that the emphasis is on developing a system that delivers greater control for Government and diminishes the control learners have over their information; not a system focused on improving and simplifying their experience.

*“How can I be sure what information is going to be shared? If I’ve got a serious medical condition, I might want that passed on – or I might want it to remain confidential. It depends who’s going to see it. How do I get a say in what information gets shown to whom?”*

*“When 14 year olds are filling in all the required info in future, will they really understand how it’s going to be used and how it could affect their future?”*

*“It’s hard work for some people to go back into education, and if they are nervous about sharing their information or about having information revealed that they don’t want others to know, they may be put off starting learning or training.”*

Our understanding is that the current plans for the learner record mean that learners will be able to view their learner record, and agree who else can see it (or parts of it) but that they will not be able to change a factually correct record – although they will be able to ‘challenge’ errors in the record. However, we think that although the record may be technically correct, this risks painting a skewed or incomplete picture that could potentially disadvantage learners:

*“It (the learner record) should celebrate the positive and allow you to paint a picture of the whole person – not just the pass or fail of qualifications...there’s no qualitative data; it’s only quantitative.”*

When former NLP members initially worked with MIAP back in 2007 to explore this policy at a much earlier stage, they stated that they would want “reassurance that learners will have control over whether or not to include courses we don’t necessarily complete” and reassurance about “the technical security of the information.” We agree with this view.

### **Online systems for IAG**

This principle of personalisation is also key in ensuring that online IAG systems work for learners. For example, the benefits of technology and online systems are used to good effect by the Connexions service which allows learners to access tailored online advice between 8am and 2am:

*“Connexions have a really good system where you can ‘speak’ online to an advisor, so that it doesn’t matter where you live or when you’re working/studying.”*

### **Compatibility and universality**

The reality is that technology and e-systems only reduce bureaucracy for learners if they work! We frequently encounter systems that are out of date, or incompatible, or which we don’t know how to use because we’ve not been trained on them. In these instances, technology becomes a *disabler*, rather than an *enabler*.

*“I think that when providers buy new systems, there should be some sort of agreement built in that it will be updated with the latest version for x number of years. Learners need to know that what they’re working with is the latest version – and not already out of date.”*

However, we acknowledge that there is such variation in systems that it is difficult to know what will be universally useful to learners in IT training – beyond email, internet and standard office programmes.

*“Everyone uses different systems – sometimes the on button is the only unifying bit!”*

#### **4. Will proposals for the new Skills Funding Agency and its gateways simplify or complicate the system for learners?**

*“The short answer is: it is too soon to say, and very difficult for us to assess at this stage, while it still feels very abstract.”*

Across all four of the gateways, we cannot envisage in a precise way the extent to which they will streamline the system for learners. Clearly if we are moving from a one-agency system with the Learning and Skills Council to a new system with various different gateways, there is a risk that things will become more bureaucratic for learners rather than less. The one thing we are sure of is that during a time of such radical change, the voice of learners needs to be integrated at every stage of the process – and embedded into its long term ways of working.

*“Inevitably when organisations change there will be teething problems, we need to be ready for that. And the organisations need to risk assess, and work with learners to identify the sticking points.”*

One problem that we can see is that the work of the Skills Funding Agency will be spread across two Government departments who may not sufficiently communicate with each other:

*“You’ve got a fundamental problem where you’ve got two departments responsible for this. My impression is that agencies and departments don’t really talk to each other enough. How’s the transition between local authorities/the Young People’s Learning Agency and the SFA going to work?”*

We also feel it is confusing to think about these as ‘four gateways’ when some of them (the adult and advancement community service, the National Apprenticeship Service) are services, and others (learner responsiveness and employer responsiveness) are ways of working that don’t provide an ‘entry point’ or service, so cannot be viewed in the same way:

*“You call them gateways, but only two of them are gateways (the AACS and the NAS). How will the initial options be clearly signposted? And how can you ensure that the different agencies will cross-refer learners properly if they need to?”*

*“The fact that I can’t imagine how it will all work is a bad sign. Get some virtual learner walkthroughs done now.”*

#### **Skills Accounts**

We believe that Skills Accounts vouchers could help to simplify the system for learners if they are expressed in terms of qualification levels and units, rather than placing the emphasis on monetary value of courses.

*“We are interested in levels and units rather than money. Skills Accounts should have account statements and a virtual voucher, so you see what funds are available, but should not be expressed in terms of monetary value.”*

However we believe learners over 25 with a full level 3 will not be incentivised to use a Skills Account, as there is no public funding available to them; Skills Accounts will therefore not simplify the system for this demographic.

### **Accessibility for international students**

We believe that the four gateway proposal for the SFA might represent an obstacle for international students accessing education in England; we think they may struggle to locate the IAG and support they need across the range of gateways and agencies tied to the SFA.

*“How about international students? Providing them with the IAG necessary to get themselves set up in the UK and helping them know which gateway they should go to?”*

### **A system that uses the same criteria across a range of different agencies**

In our experience, we think it will be important that all the gateways of the SFA and other government agencies that interlink use the same classification criteria for learners, for example in terms of learners' status as full or part time, so that learners are not excluded from funding or learning opportunities because of inconsistencies in the system.

*“You can see an example with collecting benefits. You apply to do a course and you can't do over 16 hours a week of learning. In some places, this means you are classed as full time, in some places part time and so on. Different agencies seem to classify you according to different criteria!”*

## **5. Summary of recommendations**

The more learner-led an environment becomes, the more this should reduce bureaucracy because providers and Government will need to develop a system that is responsive to our needs and expectations – rather than us having to fit into a system determined by the needs of providers and Government.

### **Government and providers should:**

- explain to learners why particular information is being gathered, what will be done with it and how they can access and amend it if they need to.

### **Government should:**

- ensure that learners and their views are involved in the development and ongoing management of the Skills Funding Agency and its gateways
- undertake 'learner walkthroughs' for each of the gateways – and review whether it is helpful to refer to learner responsiveness and employer responsiveness as gateways
- consult learners closely to ensure that the transition from EMAs to student loans and adult learning grants involves minimal duplication of information
- improve the current EMA system so that it is more responsive to any change in learners' financial circumstances over the course of the year
- promote best practice examples of where EMA payments are being handled well at a local level
- provide learners and providers with adequate support to ensure e-systems enable, rather than disable, learning:
  - introduce a level 2 entitlement to IT
  - introduce grants to improve and upgrade technology in providers
  - take into account a provider's technology provision and support during inspection

- ensure that all kinds of learners have sufficient ‘editorial control’ over their learner records and the information that is shared through MIAP
  - make sure learner records can take account of the *whole* person – not just the qualification he or she may have
- consider carefully how to simplify access to the SFA gateways for international students unfamiliar with the English funding and IAG system
- explore whether learner records could include predicted grades, so that learners could choose to share these with prospective employers or learning providers whilst waiting for their results
- ensure all its services – including learndirect and Directgov – are as accessible as possible (e.g. to learners using screen reader software)
- review the Directgov website to ensure that it:
  - employs language and a structure that is user-friendly
  - signposts to other sites with more detail
  - clearly promotes the funding available for different learners.

**Providers should:**

- undertake a review of their data collection processes to improve the learner’s overall experience and to provide a smoother introduction to further education e.g.
  - review whether students are being asked for personal or academic information more than once, at different stages of the application process or course
  - ask learners how they would prefer to be contacted and try to capture all the information needed via the one mechanism (e.g. phone, online, post)
  - consider whether administrative activity can be phased over the course of the year, so that new learners are not overburdened or put off at the start of courses
  - consider which aspects of course/provider administration could be undertaken online and how information can be merged more effectively
  - ensure that learners are properly supported in using online technology
- consider whether other course-related administrative processes are as streamlined as possible e.g.
  - only provide information relating to the learner’s chosen modules/units
  - provide ‘blanket’ permission or procedure forms where possible
  - provide information online or on disc where appropriate, instead of in hard copy
- work closely with Ofsted, the LSC and the National Student Satisfaction Survey to integrate learner surveys wherever possible – and ensure learners understand the potential impact their views can have
- ensure that their processes for handling EMA payments are simple and reliable for learners.