

28th January 2008

Michelle Dawson
DIUS Improvement Directorate
Rm N3
Moorfoot
Sheffield
S1 4PQ

892083

marian.jones@plumpton.ac.uk

Dear Ms Dawson

Consultation response - QIA/CEL Merger

Plumpton College is a medium-sized land-based college serving the rural communities of Sussex. We have been rated Good overall by Ofsted in their last two inspections (2003 and 2007). Our FE success rates are the second highest of any land-based college in England, and the highest of any FE college in Sussex. We were one of the earliest colleges in the South East to be accredited as an Action for Business College, and we consistently come at or near the top of local employer satisfaction tables. Our HE provision is highly rated and growing strongly.

We are committed from top to bottom of the College to improving our quality further. We have set ourselves the target of achieving and then maintaining Outstanding overall status in Ofsted terms by the end of 2008, and of continuing increases in success rates over the next three years. We are in the middle of a major building programme which will underpin these quality objectives as well as providing the additional capacity required to achieve our ambitious growth and financial targets.

The Governing Body at Plumpton believes that it should be fully and solely accountable for delivering these targets. We do not subscribe to the concept of "self-regulation" set out at page 6 of the Consultation Document, which envisages a (non-statutory) collective responsibility for raising quality in FE colleges alongside the responsibilities placed by statute on individual Corporations. That route leads, at best, to ambiguity and ultimately to legal challenge. Our position is not just parochial. Plumpton actively engages in the development of the wider quality agenda. Our Principal is a Board member of Landex, the national representative body for land-based colleges; our Deputy Principal (Academic & Quality) is fully engaged with Lantra on the development of the new Diplomas; our Chair is the Vice Chair of AoSEC (which represents colleges in the South East). We recognise the powerful potential benefit of peer reviews, but believe the full benefit will only materialise where the host college is fully in control of the timing and the agenda.

In our own case, we attribute the College's success in lifting quality primarily to the hard work, skill, and commitment of our management team and staff. We have also benefited from the sharing of ideas and experience about quality within our local FE Group (FE Sussex) and Landex.

Looking forward, we see two major external risks to our objective of further improvements in quality. The first is the uncertainty created by the recurrent shifts in Government policy. The second is the continuing growth in bureaucratic regulation and demands for information. We strongly support the DIUS objective of reducing the bureaucratic burden on colleges, but are disappointed at the feebleness of the net results achieved so far. Over-prescriptive rules inhibit innovation and excellence. Belt and braces procedures delay management decision-making. Over-frequent and over-elaborate requirements for data – often still duplicated - distract senior staff.

It is against this background that we respond to the questions set out in the Consultation Document.

Q1

A1 We do not agree with the mission or aims proposed. In our view, and in our experience, there is already more than enough quality improvement expertise available within the framework of existing sector bodies such as FE Sussex, AoSEC, AoC, and Landex. These bodies provide a well-established forum for exchanging ideas on best practice and for commissioning research. Over the last year or so they have all gone through management changes which have led to a period of underperformance. Arguably they have also been underfunded to realise their full potential. But we believe that – once their new management has bedded down and their members have reached agreement on funding levels – they should be in a position to provide all the services for colleges suggested for the merged QIA/CEL.

We agree in principle that there should be fewer bodies – and particularly fewer bodies with regulatory powers - on the FE quality scene. However the proposals to merge QIA and CEL within a public sector framework just does not go far enough in dealing with the present clutter identified by Foster, whatever the future governance arrangements. We believe both bodies should be wound up quickly (as suggested at para 3.3) with their college-facing functions picked up by existing FE representative bodies, and their role in contributing to the development of Government policy transferred, probably to LSC.

The arguments against winding-up do not seem to us nearly as insuperable as suggested at para 3.3. We are surprised by DIUS' apparent unawareness (from the comment at the last sentence of para 3.3 "If QIA/CEL was wound up the sector would have to reinvent a quality improvement capability") of the current quality improvement activity of the existing FE representative bodies. This is a serious flaw in their analysis of the options, and lays their conclusion that QIA needs to be retained open to challenge. As to the Government Accounting concerns referred to at para 3.3, the LSC provides an obvious alternative channel for routing Government funding, and indeed continues to this day to be much more visible than QIA or CEL to us as a source of funds to colleges and FE representative bodies for quality improvement. The LSC route would ensure proper accountability for the expenditure.

Nor do we share the view at para 3.5 that a body operating on a national scale is likely to offer a better service than more locally focussed or specialist groups such as FE Sussex or Landex. Proximity is important for engaging busy college staff on quality issues. Para 2.6 rightly recognises the growing diversity of the sector, but the risk is that a single body operating nationwide will not have the local knowledge to provide the tailored solutions required in a particular locality or the specialist

understanding of the land-based sector to provide a better service than Landex. For example, most land-based colleges offer substantial HE provision, and there is a job to be done in promoting a closer alignment of FE and HE quality standards and definitions, and in addressing the barriers to FE-to-HE progression. But HE is not a field in which either QIA or CEL are seen as having particular quality expertise at present or as likely to acquire it under the DIUS proposals.

Q2

A2 It follows from our response to Q1 that the only aim set out at para 2.5 we could support is influencing and supporting the development of evidenced-based policy for regulators, funding bodies and Government Departments. Even here we believe existing FE representative bodies could do the job more efficiently, because they have already established much closer links with colleges, already have a local or regional presence, and can lay their hands on evidence with much less bureaucracy than QIA/CEL.

Q3

A3 The proposals envisage a governance role for individual colleges and providers and for national representative bodies through the "Single Voice", but not for local FE groupings. This seems an unreasonable exclusion given the risk that QIA/CEL will seek to encroach upon their remit.

Q4

A4 Although Plumpton College has not formally considered its position in respect of involvement in the governance of a merged QIA/CEL, we think it unlikely at this stage that the Corporation will agree to act as a guarantor of the new body or subscribe to ownership in any other form. We do not subscribe to the notion of collective responsibility for the sector, and we do not think it is likely to be in the College's best interests over the crucial next few years for the College's management to be distracted by the governance requirements of a body we do not rate highly and for which we see little need.

We have no objection in principle to FE representative bodies of which we are a member taking on ownership responsibilities, providing that there is a clear capping of their financial liability. Para 3.5 implies that although the guarantee from individual colleges and providers is capped there is no such cap for the FE representative bodies. We are concerned at the liability that may arise, for example from redundancy costs in the event that the organisation is wound up (it is unclear whether TUPE applies here), from an escalation in pension liabilities, or from litigation.

Q11

A11 If the new organisation develops particular services which we think would help us, we believe it will be in the College's best interests to buy them at arms-length (para 3.14) rather than through membership subscription.

Para 3.14 also refers to the medium-term possibility of providers paying a levy or voluntary subscription. Given the pressures that we see our own strong quality agenda putting on our finances over the next 5-7 years, we think it unlikely to be in the Corporation's best interests to agree to any levy (unless backed by statute) or voluntary subscription within this timeframe.

Yours sincerely

Marian Jones
Clerk to the Corporation