The Learning and Skills Development Agency agrees that national training organizations (NTOs) have a vital role to play in delivering the United Kingdom's skills agenda and that doing so will require strengthening their role. The agency particularly welcomes the fact that the NTO framework will do the following things: include clear statements of the core roles of NTOs; identify tools required to underpin the delivery of these roles; set out the need for strategic business proposals; and identify critical success factors and indicators demonstrating success. The agency believes that the following are among the challenges facing the NTO network: changes in the post-16 education and training arrangements; the need to work influentially with key bodies; the need to develop high-quality skills assessment; and the need to engage employers of all sizes in the sector. The agency supports the following core roles for NTOs: assessing and articulating current and future skill needs; leading action on sector skills development; and actively reviewing progress in meeting skills priorities. The agency considers that skills foresight, skills dialogues, and sector workforce plan the basis of a strategic process for sector skills planning and action, and believes that NTO groups could provide the basis for a restructured NTO network. (MN)
the agency responds

Building a stronger network

Developing the role of National Training Organisations
This publication sets out the Agency's response to the consultation paper published by the DfEE in January 2001, Building a stronger network: developing the role of National Training Organisations. The full text of the consultation paper can be found at www.dfee.gov.uk/consultation/consult_doc.cfm

Note
The Learning and Skills Development Agency was formerly known as FEDA.

Further information
For further information on the issues discussed in this publication please contact:
Maria Hughes, Development Adviser,
Learning and Skills Development Agency,
3 Citadel Place, Tinworth Street, London SE11 5EF.
Tel 020 7840 5309
mhughes@LSagency.org.uk
Introduction

1. The Learning and Skills Development Agency welcomes the opportunity to respond to the consultation on the future development of the National Training Organisation (NTO) network. We agree that NTOs have a vital role to play in delivering the skills agenda and that this will require strengthening of their role and clarification of their remit.

2. We particularly welcome that the framework will:
   - include clear statements of the core roles of NTOs
   - identify tools required to underpin the delivery of these roles
   - set out the need for strategic business proposals
   - identify critical success factors and indicators demonstrating success.

3. We wish to draw particular attention to the following key points:
   - New arrangements must give significant emphasis to regional and local arrangements in order to operate effectively with the National Council for Education and Training Wales (CETW) and Learning and Skills Council (LSC) arrangements in England. Given the differing systems of education and training developing in England, Wales, Scotland and Northern Ireland, UK-wide NTOs will increasingly need to customise their systems to maintain an appropriate fit with differing national arrangements.
   - We welcome the emphasis given to partnership working and the need for NTOs to establish effective working relationships that earn them authority. The Agency is particularly concerned that NTOs should engage in dialogue with learning providers to constructively advise on ways to improve and extend the learning provision on offer.
   - The creation of individual NTOs that are stronger and more strategic will have an impact on the operation of the NTO National Council (NTONC). The role of NTONC may need to be reconsidered in the light of these changes. A focus on supporting the skills development of the network and establishing clear partnership responsibilities will be early priorities.
   - The Small Business Service is not referred to in the consultation paper. However, we believe that the Small Business Service must be a key partner if NTOs are to reach the full range of employers.

Question 1
Do you agree that this assessment has identified the key issues facing the NTO network, and with the main conclusions drawn?

4. The Agency agrees with the key challenges facing the NTO network, as highlighted in the consultation paper. These include:
   - changes in the post-16 education and training arrangements
   - the need to work influentially with key bodies
   - the need to develop high quality skills assessment
   - the need to engage employers of all sizes in the sector
   - the need to work collaboratively with other NTOs
   - development of the capacity to act strategically across their sector.

5. Given the assessment in the consultation paper, that NTO performance has had 'patchy overall impact', we believe that the role outlined for NTOs is ambitious. This states that: 'Over the next few years NTOs must respond to rapid economic and social change, make good past under-investment in skills, and ensure that education and training provision and workplace learning deliver business competitiveness and organisational effectiveness' (paragraph 1.18). Moreover, elements of this role, particularly that related to under-investment in skills, cannot be solved by NTOs alone. For example, employers' preparedness to invest and government policy, as well as NTO effectiveness, will be crucial in achieving this ambition.

6. Such ambitions will only be achieved by highly successful joint working with a range of agencies. Therefore the Agency strongly supports the need to develop effective working arrangements with the LSC and its local arms in England, CETW in Wales and the enterprise network in Scotland. In addition, key partners will include the Small Business Service, chambers of commerce, RDAs, TUC, CBI and learning providers as well as the Agency. We recommend that respective roles need to be clearly specified and differentiated, perhaps through operating statements, to maximise the contribution of different players, and to avoid confusion.
The NTO network is one part of a much bigger picture, and as such, the authority or capacity of NTOs to bring about changes must not be over estimated. For example, NTOs can influence and support education and training provision, but they cannot 'ensure that such provision is able to deliver business competitiveness and organisational effectiveness', as indicated in the consultation paper.

There is insufficient emphasis, within the initial assessment, on the key role of NTOs in the continuing development of National Occupational Standards. We believe that this is a key ongoing role for NTOs. The development of these occupational standards will inform the development of new pathways and qualifications including the development of Technical Certificates.

There is evidence to suggest that an additional weakness of NTOs, not mentioned in the consultation paper, has been a general low level of knowledge, in some instances, about vocational education provided by schools and colleges. Working with the Agency, through the GNVQ Support Programme, some NTOs have formed links with schools and colleges. Through these links, NTOs have improved and extended their own knowledge of the vocational education system, and therefore their capacity to influence it. They have disseminated this information to employers and have supported schools and colleges in the delivery of qualifications. We would recommend that NTOs must continue to maintain this up-to-date knowledge through links with schools, colleges and more widely across the range of post-16 providers.

**QUESTION 2**

Do you agree that these are the three core roles that NTOs should undertake in the future?

The Agency supports the following core roles set out in the consultation document:

- assessing and articulating the current and future skills needs
- leading action on sector skills development
- actively reviewing progress in meeting skills priorities.

We agree that assessment and articulation of current and future skills needs is a key role. We are particularly concerned that data should be presented in a format that maximises the capacity of RDAs, LSCs, CETW (and Community Consortia for Education and Training Wales) and learning providers to take account of it in their planning and strategic processes.

The setting of national occupational standards is fundamentally linked to the assessment and articulation of current and future skills needs. However, although this is referred to in the consultation paper, we believe that the ongoing updating and development of these occupational standards should constitute a core role, separate from those identified.

We note that the assessment of NTO performance indicates that nine out of 10 NTOs relied on external researchers to provide analyses of sector labour markets. There may be advantages to using external researchers who are highly specialist, but in a smaller, stronger network there may be advantages to developing an in-house capacity which enables ongoing dialogue with the sector and offers a resource for members. Consideration needs to be given to the best approach to carry out this key function.

We support the role of NTOs in 'actively reviewing progress in meeting skills priorities', and the importance of 'identifying good practice in skills development'. NTOs will need to work in partnership with other agencies to execute these roles effectively. This is particularly important in relation to identification and dissemination of good practice where a range of bodies have a stake – for example, LSC, the Agency, Inspectorates, SBS, awarding bodies, DfEE and NTOs. Coordination of effort by the range of bodies may be needed in order to secure consistency and clarity of message. This will be vital to success.

We support the role of NTOs in 'initiating appropriate intervention where progress is not being made'. We suggest that the framework should clarify in more detail the precise nature of the 'interventions' that an individual NTO, or NTONC, would be in a position to make in these circumstances.
QUESTION 3
Do you agree that these elements should form the basis of a strategic process for sector skills planning and action in Great Britain?

17. We agree that the following elements, identified in this section of the consultation paper, are the basis of a strategic process for sector skills planning and action:
   - skills foresight
   - skills dialogues
   - sector workforce plans.

18. We welcome the aim to bring these activities into a strategic process to pull together the outcomes of these three elements. We strongly support the proposals to:
   - align timetables
   - meet national, sectoral and regional planning needs
   - make clear how these plans feed into the wider workforce development planning system coordinated by the LSC, CETW and enterprise network in Scotland
   - establish a Workforce Development Planning Group to develop this process to meet the needs of sectors, government and the national and regional bodies in England, Scotland and Wales responsible for education and training delivery.

19. As stated earlier we believe that a key factor in the success of NTOs' processes will be the quality of the formatting of information to meet the needs of key partners. For example, in England, disaggregation of data will be necessary so that its implications are clear for local LSCs, RDAs and learning providers.

20. In order to ensure the quality of the strategic process, we would recommend that clear minimum quality standards be established for these elements of the process. Potential for benchmarking of performance should also be explored.

QUESTION 4
How should NTO Groups and cross-sector NTOs be changed to provide greater strategic approach to tackling broader sector issues?

21. We believe that NTO Groups could provide the basis for a restructured NTO network. However, we believe that there will be a need for a sophisticated sub-structure to ensure that the needs of distinctive sectors are recognised and understood. Employers will need to be confident that their specific sector needs will be effectively addressed. Balanced representation on NTO Boards could assist in securing confidence in the new NTO System.

22. Even with a strong sub-structure, there will be common corporate functions related to policy, strategy, research and communications which can be improved for all NTO members within a revised structure. These should lead to efficiencies of scale and enhanced performance.

23. We suggest that cross-sectoral NTOs should be a resource to other NTOs, to ensure that priority issues are addressed consistently and that national strategies are formulated.

24. The NTO coverage by workforce size is given in the consultation paper by numbers of employees within a sector, rather than by the type of business, e.g. greater than 250 employees or with 1–49 employees. The Agency notes that within particular sectors, there are big differences in the type of businesses and that this should influence the proposed NTO groupings.

25. While the needs of the three types of businesses identified – large (over 250 employees), medium (50–249 employees) and small (1–49) – are very different, the critical factor will be the nature of staff functions within the organisation. For example, the extent to which businesses are able to employ staff with specialist personnel or training functions, or the extent to which these are subsumed within more generic roles, will be a critical factor in determining how they are able to engage with NTOs and with workforce development strategies. We suggest that the framework needs to take this into account.

26. In particular, the needs of small businesses and strategies for securing their effective engagement will need careful consideration. Many small businesses are working successfully with the Small Business Service. The relationship between this service and the new NTO network needs to be clarified.

QUESTION 5
Do you agree that the critical success factors essential for a smaller network with a larger and stronger NTOs have been correctly identified?

27. The Agency agrees that the critical success factors suggested are essential for a smaller network of larger and stronger NTOs. The issue of autonomy, and what this means in terms of an NTOs remit, will need to be fully explained within the new framework. Whilst it is essential that larger and stronger NTOs are able to act independently, it is equally important that all activities fall within an agreed framework.
28. We agree with the statement in the consultation paper (paragraph 3.30) that the authority and effectiveness of each NTO is dependent on a strong, accountable and truly representative NTO board. We would suggest that the new framework sets guidelines for the form that this representation should take.

29. It is also essential, as the consultation paper notes, that clear guidelines are set on the need for impartiality and what is meant by vested interests in specific bodies, policies and commercial activities. There are currently NTOs that offer and award qualifications. It could be argued that this constitutes a commercial activity and that employers may view the NTOs as selling a product rather than providing impartial advice.

30. We suggest that the role of NTONC in relation to the critical success factors should be specified. For example, 'access to the professional skills needed to understand the skill needs of their sector' (3.28), is an area where the NTONC would be able to provide support and information across the whole framework.

31. As indicated earlier in this response, we believe that capability to work effectively with the funding and planning structures in each national context will be vital. This will require a capacity to work locally as well as regionally and nationally. A key element of this work will be to provide data on current and future skills needs within the appropriate geographical context to maximise their usefulness to learning providers and to LSCs, RDAs and their equivalents in other countries. While links through LSC Board members, as suggested in the consultation paper may be helpful, in our view, it will not be adequate.

32. As we have made clear throughout this response, we agree that the 'structure and capability for partnership working' is a key critical success factor. An example cited in this section of the consultation paper is the development of Centres of Vocational Excellence in further education colleges. These centres should make a significant contribution to the development of a skilled workforce, and exemplify collaborative enterprise between NTOs, employers and education and training providers. The Agency will seek through its involvement to secure clear, effective and complementary roles for key players.

33. We fully support the need for innovation and creativity to develop new ways to meet sector skills needs. Effective engagement with partners, particularly learning providers, will be key to success in this endeavour. Equally, the capacity and commitment to identifying and sharing such innovative practice will be essential.

34. Whilst we would agree that the use of the internet is a valuable development to support effective and regular communications, we would add that use of the internet should not be limited to communications. NTOs should work with other expert agencies, including learndirect, to enhance the use of the Internet as a tool to provide and support training within the workplace. Reviews of the variety of learning materials available through the internet could be disseminated through NTOs.

35. The consultation paper suggests the need for consistent and comprehensive indicators of performance for both NTOs and for sectors in workforce development. We agree that this is desirable, but believe that performance indicators for these two purposes are likely to be overlapping, so may be difficult to distinguish.

36. For example, one aim of government policy is to increase employer investment in education and training. This could provide a measure of NTO and of sector performance. Although increased financial support for an NTO from employers, suggested in the consultation paper, may be desirable, employer investment in direct training must also be encouraged. Differences in the nature of the various sectors and the employers within them will affect the amount of employer funding for NTOs, and may not be related simply to the performance of an NTO.
37. NTO performance measures should assess whether NTOs are meeting employers' needs as well as assessing their impact on, and usefulness for education and training providers and key intermediaries such as CETW, LSC and RDAs and their equivalents across the UK. Evidence should demonstrate that NTOs, particularly through their skills assessments, have influenced the behaviour of planners and funders and have led to more effective provision.

38. It needs to be clear where responsibility will lie for analysing these strategic indicators and developing policy based on the findings. For example, responsibility in England and Wales might lie with LSC or National Assembly/CETW in Wales and DfEE. This is not addressed in the consultation paper.
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