



Study Programmes for 16-19 year olds

Consultation Response from Natspec: the Association of National Specialist Colleges

Natspec is the membership association for independent specialist colleges (ISCs) and currently represents all YPLA funded colleges and a further 10 FE units or sixth forms in special schools. These colleges make provision for young people whose complex learning and support needs are not best met in their local further education college.

The 3,800 full time students with learning difficulties or disabilities at Natspec colleges have a wide range of ambitions and aspirations, just like their peers. Colleges use their specialism and inter-disciplinary expertise to provide personalised learning and hands-on experience which enables students to achieve their goals and improve their life chances in relation to independent living, community participation and where appropriate, employment.

Natspec colleges create a model of inclusion that works for each individual. They offer innovative and creative solutions, using technology where appropriate, to promote real independence.

Natspec welcomes the opportunity to respond to this consultation. Our comments relate to issues that will impact on young people with learning difficulties and/or disabilities in post-16 provision, and specifically in independent specialist colleges. Unfortunately there are no questions relating to section 4 of the consultation which refers specifically to this group of learners. However, we have used this opportunity to reflect more fully on the wide range of young people encompassed within this definition and their requirements, then responded to the specific questions where appropriate and added additional comments at the end.

Young people with learning difficulties and/or disabilities

The inclusion of specific references in section 4 to students with learning difficulties or disabilities is welcome. However, we have some concerns that this consultation treats these students as a homogenous group, which they clearly are not. They

include young people with sensory or physical impairments, or conditions such as Asperger's syndrome, who given the right support are able to achieve a range of academic or vocational qualifications at level 3 and above. There are also students with learning difficulties, including some with profound and complex needs, who are working below level two and for whom qualifications may not always be an appropriate route to achieving their goals. Finally there are students who have dual or multiple disabilities which will impact on them in different ways and may or may not be a barrier to achieving qualifications.

We also note in 4.6 that 'The focus of these proposals is on 16 and 17 year olds (who will be required to participate) but also covers 18/19 year olds who started their course when they were 16 or 17 and need longer to complete it. The implications of these proposals for those students who continue to study post-19 are being considered'. However, bearing in mind the legislation which supports young people with learning difficulties and/or disabilities in education up to the age of 25 where they have a Learning Difficulty Assessment (LDA), we have assumed that these young people are also included. We also note that this consultation focuses on vocational education, but we have sometimes referred to other aspects of the learning programme that are non-vocational.

Our responses to the consultation questions below relate to those young people with disabilities for whom the qualification route is generally appropriate but for whom there will need to be some additional considerations. We then look at the best options for those young people who may benefit from a different approach.

Q1) Will the measures listed in the consultation document be sufficient to ensure that the 16-19 study programmes principles are followed?

We welcome an approach which gives providers greater freedom in designing individualised learning programmes and which places greater trust in providers to do this in the best interests of their students. Personalised learning is essential best practice for those with learning difficulties and disabilities and ISCs have considerable experience in designing and delivering such programmes. We agree that learning programmes should stretch students and support them to progress, and that most programmes should include experience in the workplace and a range of support activity, especially around personal and social development. We know that the latter is especially important for many disabled learners, often more so than acquiring specific vocational skills.

We welcome the proposal for someone to oversee a student's learning programme and their progress towards their goals. This is best practice in ISCs, where tutors and key workers play an important part in managing the learning programme from the initial inter-disciplinary assessment through to their transition beyond college, and in enabling the young person to participate as fully as possible in this process.

In terms of ensuring the principles are being met, we have some concerns about how the non-accredited aspects of the programme, such as work experience and support will be measured. We say more about this in the later section on those with learning difficulties. We also know that destinations cannot always be guaranteed, no matter how successful a young person is in achieving their programme goals. There are too many external factors that influence whether or not a young person gets a job, especially in the current economic climate and when the overall rates of employment for disabled people are so low nationally. For some disabled learners, employment may not be their next step, as they may wish to establish independent living as a priority.

With regard to the role of Ofsted, the proposals in the recent consultation suggest that many providers will not be seen by Ofsted for some considerable time. We have particular concerns that Ofsted may not see examples of best practice in implementing these programme proposals unless there is some form of thematic review early in the process and again at regular intervals. In particular, we would want to ensure that Ofsted looked at the experience and outcomes of students with learning difficulties and disabilities in mainstream settings to the same extent and on the same basis as they do in specialist settings.

We have particular concerns about the inclusion of English and maths within the measures and say more about this in Q4.

Finally, we welcome the expectation that colleges will explain the programmes to students and their parents, and ensure they have a coherent programme that will enable them move towards their long term goals. This is an important aspect of the learning programme in ISCs, where learners and their parents are engaged as fully as possible in the development of personalised programmes and support. This also needs to be backed up by knowledgeable and impartial face to face advice and guidance in advance of the placement and in the transition out of college.

Q2) How will this programme of study need to be tailored for part-time students?

There are very few p/t learners in ISCs currently although this position may change. However, in terms of the needs of such learners with LDD, it will be important to ensure that there is not an undue focus on qualifications at the expense of the personal and social development aspects of the programme, and that the full flexibility of the principles is maintained.

Q3) How will the proposals affect different providers?

It is difficult to comment when the consultation on the funding review is on-going as this may well impact on the flexibility available to colleges to offer a wide range of

programmes. In particular, depending on the final options for funding learning support, providers may make different choices about their range of programme areas.

Professor Wolf's report stressed the importance of all young people studying English and maths, and particularly achieving A*-C in GCSE English and maths. As part of the implementation of Professor Wolf's recommendations, in the short term we will set out a clear expectation that English and maths must be part of a study programme for those students who have not achieved A*-C in GCSE in these subjects. It is important that providers support as many of their students as possible to achieve at least a C at GCSE as it is the GCSE that offers the best employment prospects and opportunities for progression.

In addition, the Secretary of State has signalled his ambition for the vast majority of 16-19 year olds to be studying maths within 10 years.

Q4) In line with this ambition for all to be studying maths post-16 in the next decade, we would be interested to know what you feel could be done to encourage more young people who have already achieved GCSE A*-C to study maths. What would this provision look like?

We acknowledge the importance of good literacy and numeracy in many areas of life, and wherever possible would support students with learning difficulties or disabilities to achieve these qualifications to the best of their ability. However, we have concerns about the emphasis placed on GCSE qualifications A* - C as a realistic route for all disabled students, including those who are studying at higher levels. The proposals for linear exams may impact on some disabled students disproportionately; for example, students who have significant extra time allowed for exams can find themselves working intensively for several long days each week during the summer exam period. These students may choose to be very selective about which exams they sit in this way. There may be specific issues around, for example, proof reading papers, as well as conceptual and cognitive problems in particular areas.

We would therefore urge a broader approach to English and maths, including the use of functional approaches where literacy and numeracy are embedded within a broader programme of study. This could also be applied in the workplace where students with learning difficulties or disabilities can develop appropriate strategies for managing the literacy and numeracy requirements of the job, including the use of technological adaptations.

With regard to extending study of maths, all the above caveats would apply, although again, we would encourage students to continue their studies if they are appropriate and relevant to their personal goals.

Q5) What can we do to simplify areas where colleges/employers have particular concerns offering students opportunities in the workplace, e.g. insurance, health and safety?

We are not sure these are the real barriers to finding work placements for students with learning difficulties or disabilities; indeed, we would not wish to place potentially vulnerable learners in work places without knowing all these checks were in place. Rather there are social and attitudinal barriers which have to be overcome. Changing the views of employers cannot be left entirely to colleges; it has to be addressed by the government and by society at large.

However, we know that ISCs work extremely hard to engage with employers in their localities, usually with considerable success. Natspec has collated a number of examples of useful approaches, including supporting students to train employers and raise their awareness about the benefits of employing disabled young people. ISCs also offer employer forums, in-house training, employer awards, breakfast clubs and regular 'thank you' events. Developing such successful employer engagement strategies is time consuming and therefore costly, though beneficial to the college and to future students in the longer term.

With regard to individual work placements, it is essential that these are customised to the learner's needs and that clear agreements and expectations are in place for everyone concerned. We agree that 'placements should be worthwhile, meaningful and clearly part of an overall study programme and related to its content'. However, it is important to understand that for disabled students, the content may not be linked to a specific vocational area but could also reflect their need to acquire generic employability skills.

In terms of supporting placements, we know that employers want quick access to college staff if required, a good understanding of any specific health or other needs, and clarity about the purpose of the placement, with the opportunity for regular reviews on longer placements. Natspec's annual employer survey indicates that employers value the preparation and on-going support that is offered by ISCs. Again, managing a successful work placement is time consuming, as each student will require a personalised approach. Many colleges are developing the role of job coach to support young people with disabilities in work placements and Natspec has been involved in the development of job coach National Occupational Standards.

Because many students attending work experience are living away from the area in which they might eventually work, a number of specialist colleges have extended the role of their job coaches to offering support in the home area after students leave. Other strategies include working with national employers so that students can transfer from one place to another more readily – an approach that also helps students with Asperger's syndrome, who find it difficult to adapt to changes in routine but can transfer their skills within the same employer. Colleges also help students to

find work experience in their home area during college holidays.

Acknowledging and funding the costs in staff time involved in setting up and managing successful work experience for students with learning difficulties or disabilities would be the main contribution that could be met centrally. It would also help the government to achieve the improvements in employment opportunities for disabled people envisioned in the recent SEND Green paper 'Support and Aspiration'.

Q6) What more can we do to remove barriers to providing high quality internships?

While we recognise the value of working with external employers to provide on the job experience for students, we feel that there are a number of alternative approaches which can be equally valid for students with learning difficulties or disabilities. We know that many student with learning difficulties or disabilities benefit from a more practical approach to learning, but this will often need to build up over time. We welcome the statement that the 'system should allow for maximum flexibility, i.e. there should not be a "one size fits all" approach, the type and nature of internships needs to suit the individual and the employer'. We believe that a range of approaches can be used.

Many specialist colleges offer a wide range of internal opportunities for students to work alongside staff managing college estates and services. Others have a range of campus based facilities such as shops and cafes which are run by students and many operate community based social enterprises. All of these offer real work experience and ensure that students have sufficient experience and confidence to move into external placements. We would want these opportunities to be recognised as being an equally valid aspect of the overall learning programme.

Additional comments on section 4, 'Study programmes for student studying below level 2 (previously Foundation Learning) and for students with learning difficulties and/or disabilities'.

We welcome the inclusion of this section in the consultation, although it is disappointing that responses have not been sought specifically. We agree that 'All young people, whatever their starting point, should be on courses that support and stretch them, and help them to progress onto the next level of learning, or into a job' and welcome 'greater flexibility within the system for providers to design their own programmes'. We know that there has been a proliferation of Level 1 qualifications which have not always met the needs of learners or been useful to them in moving on, as they have little currency with employers. This was raised as a concern in the recent Ofsted survey 'Progression post-16 for learners with learning difficulties

and/or disabilities'. In Natspec's response to the SEND green paper, we said 'Qualifications should be used to support a young person to move successfully into the next phase of learning, work or life. This could mean vocational skills at a level which has currency in the work place or 'A' levels for entry into university. The accreditation of independent living skills is not appropriate in most situations, particularly as the rest of the population is not accredited in this way.'

However, we also know that some young people value the opportunity to acquire units of vocational qualifications if these can usefully demonstrate their skills to employers. This might be relevant for example where a role has been 'job carved' in order to make it suitable for an individual, who could then gain accreditation in the specific elements pertaining to that role. We would therefore wish to retain the more valuable level 1 vocational qualifications.

We have concerns about the use of terminology in this section, in particular the lack of distinction between those with learning difficulties and low attainers. Some students with learning difficulties and/or disabilities will attain academic or vocational qualifications at a range of levels, while others will achieve significant outcomes which might not be subject to accreditation. The dictionary defines attainment as 'the achievement of the goals that somebody has set' and 'a skill, accomplishment, or distinction, especially one achieved through effort'. Using either definition, the attainments of learners in specialist colleges are high.

We accept that some learners with learning difficulties (sometimes with additional disabilities) may be low attainers, but we would argue that there are many other possible causes for low attainment, including disengagement from the learning process, lack of aspiration, and economic deprivation. Approaches to supporting these learners will need to be individualised to their particular needs, and will not necessarily mirror the approaches required by students with learning difficulties who are often keen to be in learning and only prevented from being so due to an inappropriate curriculum or lack of skilled support.

We do have concerns about the 30% of young people with statements at 16 who are NEET at 18, as reported by the NAO in '*Oversight of special education for young people aged 16–25*'. Some of these young people may indeed fall into both groups, having some kind of learning difficulty and low attainment linked to behaviour or mental health issues. A number of ISCs have particular skills in meeting the needs of such young people, including effective use of strategies for anger and anxiety management, developing emotional and social awareness and building self-confidence. In the longer term, many of these young people can acquire useful qualifications and successfully achieve employment, but it takes time and expertise. Unfortunately the need for such expertise is not always recognised and these young people are often pushed into inappropriate placements on leaving school and end up being excluded.

With regard to the features of the programme as it applies to students with learning difficulties, including those with additional or complex needs, we would comment as follows:

- English and maths: our concerns about this are reflected above under Q4, except that we think it is even more unrealistic for most students with learning difficulties to be pursuing GCSE English and maths A* - C. A more functional and embedded approach to literacy and numeracy is likely to be far more appropriate and will enable students to apply their skills usefully in a range of practical settings.
- Experience of the workplace: we agree that this can be very important for students who aspire to work and for whom this is a realistic outcome. We also know that young people acquire self-esteem, improved social skills and aspects of independence - such as travel - through work experience. However, we would want to see the full range of practical work related options, as outlined in Q6 above, available as part of the programme offer to these students.
- Personal and social development: we agree that this is an important aspect of the programme for these learners, and equally agree that it should not be subject to meaningless or disrespectful accreditation. We promote the use of quality assured RARPA (Recognising and Recording Progress and Achievement in non-accredited learning) as the best way to ensure that learners are set challenging targets and that their progress towards them is regularly monitored. We believe that the development of this approach could provide a means of measuring and comparing outcomes. We understand that learners' achievements should be recognised and celebrated, and ISCs have a number of approaches to this, including college certification and the use of portfolio CVs such as In-folio.
- Outcomes: we welcome the acknowledgement that there may be a range of positive outcomes for these learners, such as increased ability to live independently or communicate effectively

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