



Sgiliau i Weithwyr Proffesiynol sy'n Dysgu



Skills for Learning Professionals

Lifelong Learning UK

The Sector Skills Council for Lifelong Learning

Response to Time to Train (DIUS)

10th September 2008

For further information, please contact:

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Chief Executive
Lifelong Learning UK

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Lifelong Learning UK

1. Lifelong Learning UK

- 1.1. Lifelong Learning UK (LLUK) is the independent employer led Sector Skills Council for community learning and development; further education; higher education; work based learning; and libraries, archives and information services. Community learning and development comprises seven discrete strands which are youth work, adult and community learning, community development, development education, community development learning, family learning and working with parents.
- 1.2. LLUK's mission is to ensure that lifelong learning employers can recruit, retain and develop highly skilled and effective staff so that we can access the skills and knowledge needed for a prosperous economy and inclusive society.
- 1.3. LLUK provides the strategic perspective for workforce planning and development for the lifelong learning sector across the four countries of the UK.
- 1.4. We are responsible for defining and developing the Sector Qualifications Strategy for the lifelong learning sector. We are also licensed by the UK governments to set standards for occupational competence in the delivery and support of learning. These standards are used to inform the recruitment and professional development of our employers' staff.
- 1.5. LLUK leads stakeholders in the collection and collation of workforce data and provides analysis on workforce characteristics and trends to better inform future workforce planning. We also work with partners and other key stakeholders to improve the dialogue between our employers and those who look to the lifelong learning sector to meet their own skills needs.
- 1.6. Lifelong Learning UK works closely with UK wide partner organisations on a wide range of programmes and policy initiatives which support building an excellent workforce for the sector. This work includes working with DCSF to develop a youth workforce strategy and support the 14-19 diploma delivery workforce, and with DIUS developing the teaching qualifications framework including those teaching and supporting learning in Skills for Life, developing specific programmes focused on widening recruitment and retention and support for employers on increasing the diversity of the workforce.
- 1.7. Lifelong Learning UK, as the Sector Skills Council for the lifelong learning sector, will work with other sector skills councils to ensure that sector specific requirements that impact on the sector are fed into our ongoing impact review of sector skills agreements and initiatives. This includes close working with other SSCs on the Children's Workforce Network – a mechanism for partnership working which we value highly.
- 1.8. Further information can be found on our website: www.lluk.org

2. Introduction

- 2.1. LLUK welcomes the opportunity to respond to this consultation. We have made our response using the response form from DIUS below. We have responded as the Sector Skills Council for the lifelong learning sector rather than responding as an individual employer.

3. Response form

Time to Train

Response Form

We welcome views and comments from everyone with an interest in how time to train is taken forward; employers, individuals and representative bodies are all invited to send us your comments.

You can respond electronically via the online or offline response facility on the Department for Innovation, Universities and Skills' consultation website:

<http://www.dius.gov.uk/consultations/>

Alternatively, your responses may be sent by email or post to one of the following:-

By email to: timetotrain.consultation@dius.gsi.gov.uk

By post to: Time to Train Consultation, Department for Innovation, Universities and Skills, Ground Floor A, Castle View House, East Lane, Runcorn, Cheshire WA7 2GJ.

The deadline for responses is Wednesday 10 September 2008.

We expect to publish a summary of responses in due course. Individual respondents will not be identified in this but please note the Freedom of Information statement below.

Please email any enquiries to timetotrain.consultation@dius.gsi.gov.uk

Please note that the boxes below can be extended to accommodate your views.

Section 1: Your details

Name

Bryony Taylor

Email address

bryonytaylor@lluk.org

Position in organisation

Strategy and Policy Advisor

Organisation (if applicable)

Lifelong Learning UK

Address

Lifelong Learning UK 5th Floor, St Andrew's House, 18-20 St Andrew Street London EC4A 3AY.
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Please tick one box which best describes you as a respondent?

Employer	
Employer organisation / representative body	
Trade Union	
Individual	
Other – please specify	Sector Skills Council

Section 2: Questions for Employers or Employer organisations only (if Trade Union, Individual or Other, please skip to Section 3)

How many employees do you have?

Less than 20	
21 – 49	
50 – 249	
250 – 999	
1000 – 4999	
5000 or more	

Have you achieved, or are you working towards Investors in People status?

Yes	
No	

Have you made the Skills Pledge?

Yes	
No	

Section 3: General Questions

1. Were you aware that existing legislation gives certain employees with caring responsibilities the right to request flexible working arrangements?

Yes	✓
No	

Please explain or comment on your answer in the box below

2. Could a request for time to train help skills development in your organisation?

Yes	✓
No	

Please give reasons for your answer in the box below

However, as the Sector Skills Council for the lifelong learning sector, we will keep our response within that remit rather than answering about our own organisation.

3. Do you think the right to request time to train should cover:

Any training that the individual and the employer agree	✓
Only training that is nationally recognised and accredited	

Please explain or comment on your answer in the box below

If we are to encourage employers to invest in skills, we should not place any restrictions on those employers willing to consider *any* form of training for their staff. In order to generate a culture change in employers to regard lifelong learning a matter of course there should be no obstacles in employers' way. Rather, the emphasis should be on the business benefits of investment in training and skills. In addition, many employers may undertake their own in-house training which is unaccredited but appropriate for certain roles.

However, good information, advice and guidance should be made available to both employers and employees through careers services, Unions, Sector Skills Councils and Train to Gain brokers on the training available which is nationally recognised and accredited.

4. For which of the following reasons do you think an employer should be able to reject a request for time to train? (Please tick all of the reasons you think should be included)

Relevance of training to business productivity and performance	
Suitable training is not available	
Burden of additional costs	
Detrimental effect on ability to meet customer demand	
Inability to reorganise work among existing staff	
Inability to recruit additional staff	
Detrimental impact on quality	
Detrimental impact on the performance	
Insufficiency of work during the periods the employee proposes to work	
Planned structural changes	
None of the above	✓

Please explain or comment on your answers to this question in the box below

Each request should be considered on a case by case basis and negotiated (if necessary with a union representative). If employers are able to reject requests for specific reasons, Employers may have a wrong perception that a particular sort of 'training is not appropriate' or that the employee might not perform as well if they undertake training which is not on a perceived 'approved' training list (when the contrary may be true). A business benefits approach should be used when considering a request for time to train.

5. Are there any other reasons you think employers should be able to cite in rejecting a request for time to train?

Yes	
No	✓

Please give details in the box below

See answer above.

6. Are there any circumstances in which an employer should be able to withdraw their support for an individual's time to train where they had previously granted a request?

Yes	
No	✓

Please give details in the box below

The process should be rigorous enough to avoid this circumstance occurring.

7. Do you think any employers should be exempted from the right to request time to train?

Yes	
No	✓

8. If you answered yes to question 7, which employers do you think should be exempt?

Employers with fewer than 25 employees	
Employers with fewer than 250 employees	
Another reason	

Please specify in the box below

N/A

9. If you are an employee and had a formal right to request time to train, would you be more likely approach your employer about your training needs than you are now?

Yes	
No	

Please give reasons for your answer in the box below

N/A: Not responding as an employee.

10. If you are an employer and a statutory right to request time to train was introduced would this change your behaviour in terms of giving your staff time off to train?

Yes	
No	

Please give reasons for your answer in the box below

N/A: Not responding as an employer.

All respondents

Please use the box below for any other comments you wish to make about the proposed right to request time to train

As the Sector Skills Council for the Lifelong Learning sector, we welcome the proposals to introduce a right to request time to train. This new right will contribute to generating further investment in skills and training by UK employers (part of the key role of Sector Skills Councils). It will also link up the aspirations of individual employees with their employer to influence skills investment from the bottom up.

LLUK is aware that the introduction of the right to request time off to train may have a significant impact on learning providers – for example, there may be a sudden interest in a course but not the tutors to provide the training. Therefore, the introduction of the right to request time off to train will need careful planning with Trade Unions, SSCs - LLUK in particular, Train to Gain and the Learning and Skills Council (in England) to ensure that the lifelong learning workforce has the capacity to respond to employer/employee demand for skills. This ties into the FE Workforce Strategy which LLUK facilitated on behalf of the wider FE sector in England.

If the new right is made legislation, then there should be a careful communication plan for introducing the right to both individual employees and employers. In particular, the presentation of what the right can do for *employers* should be done from a business benefits model to encourage increased investment in skills.

The right to request time off to train could be 'launched' through Sector Skills Councils, in partnership with Train to Gain, with each SSC providing targeted information to employers in their sector about approved training and qualifications.

Freedom of Information

The information you provide in your response will be subject to the Freedom of Information Act 2000 and Environmental Information Regulations, which allow public access to information held by the Department.

This does not necessarily mean that your response can be made available to the public as there are exemptions relating to information provided in confidence and information to which the Data Protection Act 1998 applies.

You may request confidentiality by ticking the box provided, but you should note that this will not necessarily exclude the public right of access.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply

All UK national public consultations are required to conform to the following standards:

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
3. Ensure that your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process influenced the policy.
5. Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

Further information on the Code of Practice can be accessed through the Cabinet Office Website: <http://www.cabinetoffice.gov.uk/regulation/consultation-guidance/content/introduction/index.asp>
