

**SKILLS FOR SUSTAINABLE
GROWTH**

Consultation response form

JULY 2010



Skills for Sustainable Growth response form

If you are unable to use the online comments boxes to record your responses, please complete the questionnaire below and send it to:

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The Department may, in accordance with the Code of Practice on Access to Government Information, make individual responses available on public request.

The closing date for this consultation is 14 October 2010.

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Please tick the option below which best describes on whose behalf you are responding:

<input type="checkbox"/>	General Further Education College
<input type="checkbox"/>	Sixth Form College
<input type="checkbox"/>	Charity or social enterprise
<input type="checkbox"/>	Training Organisation
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Individual
<input type="checkbox"/>	Large employer (250+)
<input type="checkbox"/>	Medium employer (50 to 250 staff)
<input type="checkbox"/>	Small employer (10 to 49 staff)
<input type="checkbox"/>	Micro employer (up to 9 staff)
<input type="checkbox"/>	Trade union or staff association
<input checked="" type="checkbox"/>	Other (please describe): Sector skills council

Principles for a skills strategy

1. We welcome views on these principles and whether there are others we should consider.

We welcome the proposals set out in Skills for Sustainable Growth that describe a simple, effective and demand led system with learners and employers at its heart. It is critical that the supply side is able to respond to the needs of private, public and voluntary sector needs for the benefit of UK plc and in aiding the financial recovery. We believe that SSCs are the primary vehicle for setting skills priorities based on high quality LMII and direct engagement with employers, and can contribute to the rich mix required at a more local level in addition to the national macro skills issues for their sector.

We agree that information advice and guidance, and labour market information and intelligence is central to this aim, enabling individuals to make the right choices, and ensure that employers have the right people, with the right skills, in the right places in order to deliver improved products and services within their sector.

SSCs are well placed to enable this relationship as bodies licensed to represent the needs of employers on a sectoral basis across the UK. Colleges will also need to be able to respond freely to the demands articulated by a rich mix of sectoral and local information. Open dialogue between SSCs and providers, bringing in key local partners through the new Local Enterprise Partnerships, will enable the sector to respond to demand in a more effective manner.

SSCs can perform a catalyst role in encouraging employers to work with providers on meeting national and local sector issues, driving up skills and contributing to the economic recovery etc. SSCs are the best way of raising employer demand for learning and development, ensuring that provision is best for both employer and individual, based on needs analysis and LMII.

We agree that the needs of vulnerable groups should be considered separately from the mainstream needs of employers and individuals already engaged in the labour market. The government still needs to provide welfare and back to work interventions which should be targeted specifically at long term unemployed, NEETS and ex offenders for example. Part of this should be a pre employment offer which is based on real engagement with local employers and tied into other welfare initiatives like housing.

2. How can we further simplify the skills system, including the number, roles and responsibilities of the many organisations working in the system?

We believe that a sectoral focus should drive priorities across the supply side and that SSCs have a pivotal and central role to play in this respect. In order for employers to get the provision that they need from the supply side, the

supply side needs to know what it is that employers need. SSCs are the key lead body to deliver this information and engagement.

We welcome the focus on the role of employer led bodies in this consultation, but would wish to see the government fully commit to a demand led system of provision, where LMII and IAG from SSCs is clearly articulated.

A sectoral approach of this kind would reduce duplication of effort and the expense of maintaining many layers of sectoral and spatial skills organisations at national and regional levels. We would like to stress that national sectoral priorities that would be set by employers through SSCs in this model, would be tempered with local priorities through the new Local Enterprise Partnerships.

3. In view of the current fiscal deficit, what areas of public investment in skills could be reduced and where could private investment be increased? What are the main constraints on changing the balance between public and private investment and how could these be overcome?

We welcome the comments from government on the level of investment between government, individuals and employers in terms of spending and recognise that through the downturn it is important to balance and focus spending for the overall benefit of UK plc.

Employers already invest a significant amount in training and developing individuals who are in their employ (the UK figure is £39bn), and with current economic climate it is hard to see how employers – particularly those across public and essential services like justice and safer communities – can be tasked with investing a higher proportion when they are also undertaking budget savings.

Responding to sector demand is a crucial role for colleges and other providers of FE. If provision is led and planned on an evidence basis, from the intelligence and engagement provided by SSCs, then market forces will prevail with employers choosing to spend their budgets on the best possible choices.

This correction of the market away from supply led to demand led will enable employers and individuals to make the best and most informed choices possible, and lead to improvements in products and services.

A respected and credible training offer

4. How could the Apprenticeship programme be improved? What can be done to increase the proportion of apprentices progressing to Level 3 and beyond? What and how should employers contribute to Apprenticeships?

SSCs already have a key role in the promotion and development of apprenticeship frameworks, with responsibility for approval of the

qualifications they contain, as well initial development. It would seem logical to utilise existing mechanisms in respect of promoting the current frameworks and driving up demands for existing and future programmes via the excellent networks already established by SSCs.

There is a substantial and growing interest in the role and nature of Apprenticeships across Justice and safer communities. We have worked closely with employer partners over recent months on explaining the benefits to them of employing apprentices and are working to establish apprenticeships as a quality credible route for careers and roles in Justice. We agree with the ambition to establish parity of esteem for Apprenticeships, and other VQs, with more academic routes. We would welcome more clarification on the role of SSCs as employer led bodies in being the driving force behind establishing and growing apprenticeship frameworks with employers.

It is important that the work we have already undertaken with our employers in terms of raising aspirations for, and demand for, apprenticeships is maintained. We would welcome the exploration of a guild based approach to apprenticeships, better employing progression through the VQ pathway which supports our sector in developing cross sector approaches to learning and development. Key employer groups on a cross sector basis have expressed interest in cross justice apprenticeships for example. We believe that approaching training and development across career pathways, supported by strong IAG mechanisms which take account of employer demand, could improve progression from level 3 to 4 frameworks.

We would raise concern however that positioning Apprenticeships as the primary work based learning route is not possible in every sector of the economy, and that a truly demand led, flexible and responsive system would be able to take into account sectoral differences. Apprenticeships are one way of developing skills in the workforce but a one size fits all approach has not worked in the past. We would strongly urge government to take into account the different needs of each sector, rather than establish an overall national target for achievement. We have worked hard to encourage employers in justice and safer communities to explore apprenticeships and would want to continue to build on these strong foundations in partnership with employers and learning providers. Whilst we recognise the current financial constraints we would welcome consideration of the differential funding rates and investment in encouraging over 25's to undertake apprenticeships. For our sectors, who typically do not employ younger people in all roles, this is a particular issue.

5. We welcome views on how best to support people who might in time benefit from an Apprenticeship but who do not currently have the skills to begin one.

We agree with the views that not all candidates are apprenticeship ready, and that all vocational career development should be undertaken with respect to real job outcomes and with tangible benefits for the individual.

We would suggest that pre entry schemes are critical to the achievement of apprenticeships, with a focus on employability skills, and employer need at the heart of their development. A pre employment offer is central to encouraging access to the labour market and improving social mobility opportunities through work and training. This will be vital in terms of maintaining progression routes through school and college education into work based solutions.

The Specification for Apprenticeships Standards in England (SASE) is currently under review, and the network of SSCs will welcome the opportunity to provide more detailed advice when and where appropriate. The demands for Apprenticeship frameworks vary across different sectors, and we believe that the legislation should recognise these differences.

6. We welcome views about progression from Level 3 Apprenticeships into higher education, including whether there is demand for Higher Apprenticeships at Levels 4 and 5.

We warmly welcome the focus on higher level apprenticeships as this is of particular relevant to our sector and the range of roles that it employs. This will be different for other sectors though and is another example of the value of a sectoral approach to skills and supply of provision. We would welcome the development and use of Higher Level Apprenticeships (HLAs) as a mechanism for enabling movement into higher education and the overall creation of a professional technical route through the justice sector.

We would welcome more dialogue with HEIs on the establishment of higher level apprenticeships. Whilst some employers in our sector would welcome this approach many already have good relationships and HEI level programmes running for specific roles and occupations. We would not want the development of HLAs to conflict with current provision that has been proven to meet employer need. We are supportive of the recognition of Apprenticeships through the UCAs tariff as a mechanism to establish parity of esteem but believe that a more coordinated approach to vocation education at a higher level needs to be achieved through better dialogue between HEIs and SSCs as employer led bodies.

SSCs will be a critical mechanism through which to assess demand, and develop relevant and sectorally focussed apprenticeship frameworks, with clear progression through levels 4 and 5. Closer engagement will need to be explored with HE and FE networks, and professional bodies, in respect of not duplicating effort and making the links between HLAs, traditional academic qualifications, and professional development.

7. How should we ensure that training leads to real gains in skills, knowledge and competence and not just the accreditation of existing skills?

Employers already invest a significant amount of money and time in training and development, whether formal or informal, or on or off the job. This level of resourcing is not insignificant across justice and safer communities, representing the level of commitment to making sure that the workforce has the right skills in the right place at the right time to deliver effective and high quality services.

Information advice and guidance and high quality LMII are central to achieving this goal, as they will guide providers and individuals to the right choices which will benefit everyone.

In terms of government being able to ensure that training leads to real gains rather than 'deadweight' it is crucial to move away from centrally driven qualifications based targets and towards a more imaginative and flexible system based on credits and business improvement, where sectors can set and own their own targets, based on their own measures of productivity and social return on investment.

8. How can we incentivise colleges and training organisations to offer a flexible and cost-effective 'needs-led' offer for people who are out of work or at risk of becoming unemployed?

We recognise the valuable role of colleges and locally based training providers in delivering services to those out of work or at risk of unemployment. Data and intelligence from SSCs should lead local providers to be able to target this investment in the most appropriate manner. Again we would reiterate the point that a mix of sectoral and local information should be at the heart of the planning mechanism for any system.

We would also like to see more focus on the role of volunteering as a critical way back into work, alongside reforms and policy ideas within the Big Society.

9. How can we encourage colleges and training organisations to make the transition from learning to work as smooth as possible, enabling progression in the workplace, as well as to further learning?

Employability skills and the provision of high quality IAG are central to the ability to move from learning to work in a seamless manner, using stepped

progression routes allied to career progression routes. SSCs will be able to provide engagement with employers, and access to high quality LMII, which will inform the planning and provision within the college and training system. We also recommend that government explore with FE supply similar statements around employability such as those being brought into HE.

Skills for Justice has developed a quality kitemark in partnership with employers and at their request – Skillsmark – which seeks to ensure that employers can have confidence in the provision that they are buying from the supply side. We have already worked with a range of partners across the supply side on making sure that their programmes are relevant to employers and fit for purpose.

Providers with Skillsmark can be confident that their programmes, once endorsed through our processes:

- provide learners with the skills and knowledge they need for employment, and that employers want from their staff
- show learners and employers that programmes are up to date and fit for purpose, and
- gain a competitive edge by showing that programmes have been designed specifically with employers in mind

We would advocate exploring the use of kitemarks in this way as it also helps to incentivise employers to use local learning providers, confident that their investment is directed towards the right outcomes.

10. How can we better promote enterprise education in further education colleges and throughout the training system?

There is already a lot of activity in the area of enterprise education in further education and it is important that this good practice is not dismissed or re-invented. Promoting this activity and sharing good practice is vital so that others can find out what works well and how to implement it. Each party involved needs some better incentives to participate, not necessarily financial but system driven incentives to engage everyone in the vision.

Academic learning is not necessarily appropriate in all situations. Individuals could be mentored by an entrepreneur or attend master classes - providing access to expertise will in itself build relationships and foster learning.

Funding and entitlements

11. Should Government continue with an entitlements based approach? How can we ensure that Government money is targeted where it is needed most and where it will achieve most value?

We agree that the government should continue to employ an entitlement based approach with regards to funding individuals learning and training, although it needs to be highly focussed on local and sectoral need, and considered carefully in light of the current financial climate.

We agree that government should continue to provide a safety net and target spending where it is most needed and will achieve the most impact. We would reiterate that local need should be mixed with sectoral priorities to ensure that progression to employment is as seamless as possible, as well as managing the expectations of the individual. Any initiatives should be based on real impact for the individual, rather than blanket initiatives which have limited real impact.

Helping individuals and employers choose the learning they want

12. How can the learning market be made to work more efficiently, effectively and economically and to be more responsive and accountable to demand by individuals and employers, while also delivering value for money?

We agree that measures need to be undertaken to ensure that the learning market is responsive and flexible to both individual and employer need. We believe that placing SSCs and their labour market intelligence at the heart of planning mechanisms will enable resources to be focussed in the best way possible. With the current economic climate spending – from both an individual and employer perspective – needs to be focussed on the best outcome possible and using both a single pot of funding as well as intelligence led provision planning should achieve this.

SSCs can provide high quality information on the demand from employers on a cross sector and cross UK basis, based on close working relationships with all employer partners. This information can be used to plan provision in a more flexible and responsive way than at present.

SSCs at the centre of the skills supply system will drive efficiency, focus funding, deliver effectiveness and ensure responsiveness. This will come about through full information (LMII, SSA, SQS) being employed in the planning of provision in partnership with colleges, LEPs, SSCs and employers, to which can be attached real outcomes for local economy, individuals, and employers.

We have had good experience in brokering these deals with employers in our sector, through our current sector compact, and have a number of operational joint investment frameworks already in place. These are with a range of employers and agencies across justice and have enabled us to maximise investment from employers and target public funds in the best way possible.

The SSC will utilise its governance structures and engagement with employers to decide the levels of support available and ensure that there is a direct return on the public investment. Differentiated levels of match contribution could be negotiated with each employer depending on the outcomes of their training needs analysis. Co-investment in training in this manner will therefore be targeted to the most appropriate areas for employers and lead to real skills gains for individuals, as well

as best use of the public purse. Approved colleges will then be able to provide the training based on the local needs assigned through the joint investment framework.

Public funds would be paid directly to the recognised training providers, with the co-funding coming directly from employers to make up the full cost of the training.

Within this model SSCs would have a key role in directing funding and would complement other activities such as research and labour market information, and the kite marking of providers such as through the Skillsmark programme outlined above.

13. We welcome views on how best to ensure employers are able to shape the skills system to meet their needs.

SSCs are the most recently quality assured bodies in the skills system and are the only organisations with a direct licensed remit to represent their sectors' employers on skills issues. Employer engagement is a key role for SSCs, and the SSC provides a unique channel for employers who wish to engage with organisations who understand their specific needs and circumstances.

The vehicle for the employer voice is present through SSCs but the system needs to be flexible and able to respond to this voice and consider its requirements *before* putting policy in place.

There is a need to shorten the communications channels between employers articulating their needs and policy action. The system also needs to be able to respond quickly, and removing the layers of bureaucracy created by eligibility criteria on funding would help here.

14. We are interested in views on what more might be needed to make the system responsive to employer needs.

In order to make the system more responsive we would urge government to move away from the use of qualifications as a proxy measurement for skills, and utilise the full range of credit options available under the QCF. If employers can link skills acquisition to real business improvements this will deliver far more benefit than the number of individuals with a L3 qualification. It will also provide focus for providers.

SSCs are there as a ready made and quality assured network with good engagement levels as recently highlighted in CBI report. We have more visibility than any other employer led body within our own footprints, and more successful engagement than locally led provision through business links for example. As recently inspected and relicensed we are a group that are clearly fit for purpose and providing a unique service.

15. Which qualifications have most value for employers and learners? Which do not have value? How do we evolve the Qualifications and Credit Framework so that it focuses on the former and removes the latter?

A focus on credit over qualifications would be a great place to start. Even with the advent of the QCF the supply side is still focused on full qualifications – driven by central targets in this area primarily. Sectoral targets based on business improvement, return on investment and high performance working, related to the real CPD needs of that sector will enable skills and credit acquisition to be of value to employers and individuals. Building into qualifications over time, as the portfolio of skills developed. This will also get rid almost entirely of deadweight. The qualifications and skills demands outlined in SSC SSAs and SQSs should be a guide for planning provision to respond to employer need both now and in the future.

16. How can we improve the accessibility and quality of careers information, advice and guidance services for adults?

Information advice and guidance should be informed by sectoral priorities and tempered by local workforce data. The creation of a network of professional impartial careers advisers would be excellent but current investment levels are not sufficient and with the economic climate unlikely to be increased. Careers opportunities should be promoted as is the advice and guidance aspect via affordable media. Quality assurance of information provided by SSCs needs to be maintained if individuals are to make decisions based on the content of Nextstep for example.

Through our work on information advice and guidance we have developed a number of valuable case studies that are having an impact on employers and individuals choices. Our Careers Choices website pages provide key insights on roles within the sector, in video format, the most recent version relates to courts clerks, where we were able to use our employer contacts in a crown court to speak to people about what doing the job is really like. Employers have already commented on the positive impact that activity like this can have on introducing a different range of people to the large number of opportunities across the sector.

17. We welcome views on the vision for lifelong learning accounts, and their potential usefulness.

Keeping the mechanism simple will be of the highest priority ensuring that bureaucracy does not creep in. Lifelong learning accounts need to be attached with real meaning to both funding and progression through work or they won't achieve their objectives. Whilst we agree that incentivising

individuals to invest in their own learning and development is important it is equally vital that additional layers of bureaucracy are not added into an already complicated system.

18. We welcome views on approaches to informing learners and employers including how better information can be made available while reducing bureaucracy.

Quality assurance and kite marking processes should be as simple and effective as possible, with providers being assessed on how well they are meeting employer need. Through the use of sector endorsed kitemarks and benchmarking (e.g. TQS) improvements should be generated without creating unnecessary layers of bureaucracy. Within our Skillsmark quality mark we have taken into account current assessment of the performance of learning providers, and have developed a fast track programme for endorsement specifically for HEIs.

Giving colleges and training organisations the freedom to respond

19. We welcome views on our planned measures for simplification and freeing colleges and training organisations.

We commend the government for endorsing the simplification of the sector, and aspiring to free up colleges and training organisations to respond effectively to employer and individual need. Data collection to inform planning and success measures should be clear, simple, effective and available to all.

If colleges and learning providers worked in partnership with sectoral bodies and employers to set targets and response plans then far more ownership of the targets would be possible – from both sides of the supply and demand picture.

Destination data is vital for informing colleges, employers and individuals as to whether planning mechanisms are right, whether choices are right and whether provision is right although it is notoriously hard to get the rich level of data that would be required.

20. How can we enable colleges and training organisations to be more efficient and responsive to the needs of employers, learners and their community but without adding new layers of control by local bodies?

There are already significant planning documents that could and can be used by colleges and training organisations to be more efficient and responsive from a sectoral employer led standpoint. Strategic Skills Assessments, Sector Qualification Strategies and LMII from SSCs can all contribute to the planning

of provision without creating new structures or layers of information that isn't already there.

Evidence based planning based on the rich engagement that SSCs have with their sectors is critical in this respect. It is also beneficial in that it won't require new bodies or agencies, but would encourage SSCs and the supply side to work together in partnership to meet employer and individual need. .

SSCs have an impartial role in representing the needs of employers and are already well placed to be able to articulate need across their sectors – market forces of demand and supply will be able to regulate efficiencies and response to need.

21. What mechanisms could we use to hold colleges and other training organisations to account for their performance in responding to employers' needs and for prioritising training that adds real economic value?

We welcome the recognition that colleges and other training providers need to assess as to how they are responding to real need rather than meeting arbitrary central targets. As the SSC for justice and safer communities we believe that performance criteria based on employer evidence led planning linked to real business impact, such as that which is employed in the development of joint investment frameworks at present would help to bring about this change. The information that providers need to meet the demands of employers can be gained through the provision of SSC led LMII and the collaborative development of sector based qualification strategies. .

Incentives to train in priority areas

22. Do we need a framework that will enable and encourage employers and individuals to invest in training in priority areas and for colleges and other training organisations to provide appropriate courses?

Employers already invest significantly in developing the skills, knowledge and understanding of their workforce. We also recognise that individuals and government undertake significant spend as well. It is far more about making sure that spend is targeted in the right way rather than at deadweight.

Sectoral direction in terms of employer need will correct the market forces by providing training that employers really want. We have seen success in the development of joint investment frameworks with a range of partners across justice, and would advocate the further exploration of similar models. We believe that this approach not only encourages employers to invest in skills and learning, and therefore quality, even in the face of reduced budgets but also ensures that best use is gained from the public purse as learning opportunities are targeted and measured against tangible business needs.

SSCs already exist and have current employer relationships that can inform planning and provision through the supply side and SSC LMII can articulate the priority areas for that sector.

23. Should we promote training innovation, particularly in rapidly changing or wholly new areas of the economy? If so, how might we do this?

Yes, we agree that innovation in approach to planning and commissioning training should be encouraged in all parts of the economy. Partnership between employers and providers, in collaboration with local bodies like the local enterprise partnerships, will enable clear articulation of real sector need which can lead to innovation rather than repeated delivery of the same old stuff that nobody wants. Innovation in this respect should also link into higher education and research facilities.

24. How can we ensure employers can access high quality labour market information?

Employers already can access high quality LMII through SSC mechanisms and contribute to the additional qualitative data that SSCs are tasked to collect. We already have a dedicated product which is accessible to our employers in the form of our LMII matrix which articulates the current and future skills needs and workforce mix of the sector, Employers and other partners are able to access this information through their work with Skills for Justice. SSCs work with employers to bring greater understanding of the LMII to them rather than just facts and figures etc. SSCs can provide a rich mix of data which brings benefits to the employer, the individual and the provider, in enabling them to make the right choices.

Encouraging a more productive workforce

25. What would enable businesses to use skills as a driver of productivity and business improvement?

Using skills acquisition and the build up of credits – linked to real business need – would enable clear links between skills development and business improvement. It is important that qualifications are not seen as the standard proxy measurement of competence with central arbitrary targets driving the provision of training. In terms of productivity and business improvement – or social return on investment which is far more useful in respect of public and essential services – if employers are engaged far more in planning and provision through the SSCs they will be able to provide a clear link into business improvements and efficiencies gained from up skilling their staff.

26. We welcome views on ways in which businesses can be encouraged to increase the UK's leadership and management capability to create better run and more highly performing businesses.

Leadership and management is a critical skills issue identified by our sector in the recent Strategic Skills Assessment. We have already worked with agencies across the sector exploring alternative and flexible ways of developing leaders at all levels in their organisations, better utilising collaborative and clustering approaches to ensure the transfer of best practice. SSCs are a key part of ensuring that employers see the real benefit of developing their skills in this manner, and we have already used action learning, collaborative leadership and the activity undertaken under the Women and Work programme as a way of delivering sector led, sector endorsed leadership and management solutions.

Reinvigorating adult and community learning

27. How could we encourage the development of productive partnerships with third sector organisations?

Voluntary sector has a key role to play in liaison with local agencies and colleges to develop and deliver skills solutions. Through the potential impact of the Big Society innovative solutions can be brokered through needs based partnerships at a local level. Localised engagement should deliver some embedded and locally required solutions although is unlikely to deliver cost savings unless there is some recognition that duplication of effort needs to be avoided.

There are financial challenges to long term planning and partnerships in relation to the activities of the voluntary sector, where short term and unsustainable funding is often a barrier to ongoing services. Sustainable funding and focused policy ambitions need to be maintained if the voluntary sector is to be fully able to assist in the reinvigoration of adult and community learning.

28. We welcome views on new ways that colleges could be used to support the community.

No comment

29. How could adult and community learning be reinvigorated? We especially welcome ideas for how businesses and others could be encouraged to engage in supporting local community learning to help create local ownership and momentum.

No comment

Measuring success

30. We welcome views on those indicators of success would be most useful to you or your organisation.

We would welcome approaches that take into account sectoral and employer need, set by local providers and agencies in partnership with SSCs. This would allow for both local and sectoral ownership of targets related to the delivery of provision.

Measures should be based on impact. By encouraging employers to evaluate the training they receive this will show the effect training has had and engage employers not yet engaged. We suggest that one central measure of impact should be Return on Investment of qualifications but other measures could include whether interventions have increased number of new start-ups or the number of businesses entering new markets.

Measures could also be widened to assess the impact of the education supply-side to ensure that they engage strategically and effectively with employers. Measures could include:

- Employer satisfaction on the quality and 'work readiness' of new entrants from school, college, university and through routes such as Jobcentre Plus.
- Measures to ensure that training providers who deliver publicly-funded training operate to agreed quality standards, and that their offer is a good fit with employers skill needs.
- Measures that link providers' outputs with the delivery of sector 'compacts'/agreements agreed by employers through their SSCs, e.g. or through National Skills Academies.

Do you have any other comments that might aid the consultation process as a whole?

Please use this space for any general comments that you may have.

Comments on the layout of this consultation would also be welcomed.

SSCs have critical and vital role.

