



Department
for Business
Innovation & Skills

ADULT FURTHER EDUCATION

Consultation Response Form:
Outcome based success
measures

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Annex 4: Response form

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Summary of key response points:

NIACE is the National Institute of Adult Continuing Education, the national voice for lifelong learning. We are an internationally respected development organisation and think-tank, working on issues central to the economic renewal of the UK, particularly in the political economy, education and learning, public policy and regeneration fields. We campaign for the personal, social and economic benefits from lifelong learning, work to improve people's experience of the adult learning and skills system, and fight for all adults to have opportunities throughout their lives to participate in and benefit from learning.

The proposals for new outcome based success measures

The accountability of public services is important and particularly so, when as in the case of learning and skills, the service supplied underpins our economic success and individual prosperity. To date, the measure of success in further education has been learner achievement of qualifications. This measure has proved very successful in inspiring providers to improve learner retention and achievement. Through continuous refinement of their approaches, provider success rates are now commonly well above 80%.

In the future, rather than relying on the single measure of qualification achievement, the Government proposes to add several new measures of success. However, these additional new measures are quite different in character because whereas qualification achievement is an output measure, the proposed additional success measures are all measures of outcomes.

NIACE's overall viewpoint and key points

We are very supportive of the introduction of outcome success measures as this reflects that for most learners, participation in learning is a means to an end rather than an end in itself. However, because these measures will change the whole basis upon which providers are judged, the measures need to be carefully developed and introduced over a timescale that does not introduce shock into the skills system.

Furthermore we feel:

- The outcome measures should be introduced as part of a balanced score card which also includes input measures relating to who participates and the level at which they participate. This will help avoid any perverse equalities impacts by measuring providers on the extent to which they serve and meet the needs of everyone in their community as well as the extent to which they secure helpful outcomes for those who do participate.
- We welcome the proposal to provide contextual information alongside the release of headline measure data. We are wary about the presentation of headline data in any format, such as a widget on providers' website homepage, which does not allow space for this contextual information.
- We need a means to compare provider performance but in recognition of the diversity of adult further education provider type and delivery, we need a more sophisticated solution to achieve this than the simplest form of performance table.
- We would prefer that the sustained learning measure records the proportion of learners who are in learning, at any level, for three months within the September to July period after the academic year in which the learning was completed. This would recognise the diversity of adult learner learner start times and learning duration.
- We would prefer that the definition used for the sustained employment and earnings measures is three months in employment within 24 months of the start of learning for learning aims lasting up to one year and within 36 months for learning aims lasting up to two years. This would recognise the longer time it takes some learners to gain employment as a result of learning.
- We recommend that only learners whose immediate intention on the day before their learning began (as recorded on the ILR system) is the outcome being measured, should count towards the result.
- We agree that the principles of outcome based, simple and transparent, proportionate and rigorous provide a helpful starting point towards a new set of minimum standards. We propose an additional principle that the minimum standards should also be appropriate i.e. only measures that are substantially within the provider's control should be used within the new set of minimum standards and only learners for whom the measure is applicable should be counted towards performance against these measures. Although we welcome the creation of a success measure for earnings change to enable providers to demonstrate how learning has led to learner progression in work, we are unsure whether, and suggest research is carried out to determine if, the earnings change is sufficiently within the provider's control for it to be included in the new set of minimum standards.
- Because learning to support earnings change is such new ground for providers, we believe they would benefit from an innovation fund and support programme to test new approaches to delivering this outcome
- We believe it would be wise to phase in these changes over a longer time period. Providers need enough time to develop approaches to achieving these outcomes and to reveal and address any negative impacts. A longer period of time will also allow a counterfactual analysis to inform the establishment of minimum benchmarks for each outcome measure.

The publication of outcomes data linked to outcome measures is very welcome as this data demonstrates the tremendous value of learning. It is impossible to deny the transformative impact of learning when the recent experimental data release shows that 44% of 135,000 JSA or ESA (WRAG) benefit claimants found sustained employment on completion of a full

level 2 qualification.

The publication of performance data against the proposed outcome success measures

The proposed outcome success measures will challenge providers. Whereas outputs, such as qualification achievement, are substantially within a learning provider's control, outcomes albeit gained in part through the learning provider's input, also require other inputs that are not all within the provider's gift. Whilst this should not prevent the adoption of outcome success measures, it is important that users of the data are aware that factors beyond a provider's control may have had a negative impact. For instance, the closure of a local major employer may depress both the acquisition of sustained employment and earnings. We therefore welcome the proposal to provide contextual information alongside the release of headline measure data. For the same reason we are wary about the presentation of headline data in any format, such as a widget on providers' website homepage, which does not allow space for this contextual information.

The transparency of information is important - as much as possible should be published as often as possible, in order to help individuals and employers make informed choices. Performance tables have been used for some time to present schools' attainment data. This is straightforward in schools because they all deliver the same National curriculum to learners of similar age i.e. like is being compared with like. The more diverse nature of adult further education providers and the greater diversity of adult learners' ages and prior attainment make it much more challenging to formulate meaningful tables for adult further education provision. It would also be difficult to incorporate contextual information within performance tables. We need a means to compare providers but we need a sophisticated solution to achieve this.

The provider response to the introduction of outcome success measures and ways in which to counter unintended consequences

Learning does, of course, lead to multiple positive outcomes including greater involvement in the community, improved relationships and improved health and wellbeing. There is a clear link to Government priorities for its adult skills budget in its choice of outcome success measures relating to:

- progression into sustained employment or further learning;
- progression into learning at a higher level;
- and earnings change, is clearly linked.

This is quite appropriate; well designed accountability measures should support overall policy objectives. However, the inevitable close attention providers will give to these outcomes must not cause them to forget to consider and seek to optimise other outcomes of learning. This is particularly a risk with these specific outcome measures because they directly or indirectly impact on three major drivers of provider behaviour, funding, minimum standards and Ofsted inspection outcomes:

- local Enterprise Partnerships may award funding based on performance against these measures;
- the measures may be used as the basis for a new outcome based set of minimum standards; and
- Ofsted has said the measures will inform the outcome of their inspections.

Consequently, the introduction of these success measures is likely to prompt a dramatic provider response. To do well against these measures, many providers are likely to need to

do much more to help learners find, retain and progress in employment and undertake further and higher levels of learning. This may involve assigning resources to establish job search support for learners and providing in-work support and learning to help ex-learners retain and progress in their jobs. Whilst these developments would be welcome, particularly as they will encourage providers to move away too narrow a focus on qualifications, there may be unintended consequences as:

- the new investments may take resources away from other types of provision;
- providers may choose to do less with learners that are less likely to secure sustained employment in the near future; and
- providers may also choose to offer less provision in occupational areas where employment opportunities, although important to the local economy, are few or low paid.

To ensure that any unintended consequences are identified, it will be important to closely monitor the impact of these measures. To counter any possible perverse equality impacts we feel it would be helpful to introduce the outcome measures as part of a balanced score card which also includes input measures relating to who participates and the level at which they participate. This will ensure providers are measured on the extent to which they serve and meet the needs of everyone in their community as well as the extent to which they secure helpful outcomes for those who do participate. It might also be wise to phase in these changes over a longer time period. Introducing new minimum standards based on these outcome measures from 2016/17 seems very soon. Providers should be given enough time to develop approaches to achieving these outcomes. This time will also reveal and allow the mitigation of any negative impacts on different types of provider and learners.

To counter providers' likely diversion of resources away from types of provision where the purpose is not to support employment acquisition or progression in work or learning, for instance, personal efficacy provision such as financial capability learning, it may be necessary to debate and discuss the use and size of the £210 million Community Learning Fund to allow greater delivery of these forms of learning within Community Learning provision.

Definitions for the outcome success measures

The potential for these measures to so drastically change provider behaviour also means that that it is important that they are fully fit for purpose. To support them to be fully fit for purpose:

- We recommend that sustained learning measure records the proportion of learners who are in learning, at any level, for three months within the September to July period after the academic year in which the learning was completed. This would recognise the diversity of adult learner participation patterns affecting learning start times and learning duration.
- We recommend that the definition used for the sustained employment and earnings measure is three months in employment within 24 months of the start of their learning for learning aims lasting up to one year and within 36 months for learning aims lasting up to two years. This would include learners who found sustained employment up the 12 months following their learning; possibly after a series of temporary jobs which is a common pathway leading to sustained employment in some occupations. It would also ensure providers are not penalised for learners leaving their courses early because they have secured employment possibly as a result of acquiring new skills early in their course. It would also more closely align with job outcome payments on the Work

Programme which are paid for some participants on being in a job for three months.

- We recommend that only learners whose immediate intention on the day before their learning began (as indicated on the ILR system) is the outcome being measured, should count towards the result. This will retain Apprenticeship learners towards the sustained employment measure but remove any distortion from people already in work who remaining in work after their learning. It would also ensure that providers are not disincentivised from working with learners who are at an early stage of their journey towards employment as it would be appropriate to give their intention as further learning and as such they will not count towards and pull down the sustained employment result. It would also allow the earning change measure to only apply to learners who might be expected to increase their earnings following learning (again this could be indicated on the ILR system). If this was the case it would apply to people on Apprenticeships or other forms of work based learning but not apply to people undertaking English or maths or other provision that arguably helps people remain in work rather than having any impact on wage levels.

The use of outcomes measures as the basis for a new set of minimum standards

We agree that the principles of outcome based, simple and transparent, proportionate and rigorous provide a helpful starting point towards a new set of minimum standards based on the outcomes of learning. However, we suggest an additional principle that the standards should be:

- **Appropriate:** only measures that are substantially within the provider's control should be used within the new set of minimum standards and only learners for whom the measure is applicable should be counted towards performance against these measures.

Although we welcome the creation of a success measure for earnings change to enable providers to demonstrate how learning has led to learner progression in work, we are unsure whether, and suggest research is carried out to determine if, the earnings change is sufficiently within the provider's control for it to be included in the new set of minimum standards. Because learning to support earnings change is such new ground for providers we believe they would benefit from an innovation fund and support programme to test new approaches to delivering this.

For the time being, we feel it would be best to focus on the development of appropriate success measures and only when these have been fully tried and tested and provider's reactions to them are known, should we establish a methodology for, and act upon poor performance against, minimum standards. Introducing new minimum standards based on the proposed outcome measures from 2016/17 seems very soon. In this consultation response we have suggested changes to the definitions used for the proposed outcome measures and it would be necessary to see experimental data over a reasonable time period against these refined success measures before they could be adopted and then incorporated within a new set of minimum standards. A longer period of time will also allow a counterfactual analysis for each outcome measure e.g. for the sustained employment sub-measure this would tell us how many of those who get sustained jobs following learning would have done so anyway without the learning intervention. This would be helpful in considering value for money and in informing curriculum design. The Skills Funding Agency may wish to mirror to an extent what the DWP has done in setting minimum benchmarks based on an estimated counterfactual.

Question 1: Do you believe that the definitions for the headline destination measure and sustained employment and sustained learning measures are appropriate?

Sustained employment and sustained learning are the primary destinations for adult learners so these are appropriate sub-measures for the headline destination measure.

However, in view of the diversity of adult learner participation patterns affecting learning start times and learning duration it may be helpful to reconsider the date and duration criteria within the measure definitions. We therefore suggest that an improved definition of sustained learning measure records the proportion of learners who are in learning, at any level, for three months within the September to July period after the academic year in which the learning was completed.

Alignment with welfare to work programme performance measures is important in supporting partnership working between the welfare to work and skills systems. Work Programme job outcome payments are made for some participants when they remain in employment for three months and therefore we suggest that three months should be the definition of sustained employment within the sustained employment success measure. To ensure providers are not penalised for learners securing employment possibly as a result of acquiring new skills early in their course, we suggest that learners who find sustained employment during their learning should be counted within the sustained employment and earnings measures. We therefore recommend that the sustained employment and earnings measure criteria is adjusted to be three months in employment within 24 months of the start of their learning for learning aims lasting up to one year and within 36 months for learning aims lasting up to two years. This would include learners who found sustained employment up the 12 months following their learning; possibly after a series of temporary jobs which is a common pathway leading to sustained employment in some occupations.

It is helpful to have a separate sub-measure that measures the proportion of learners claiming benefits that enter sustained employment. In line with our recommended change to the sustained employment measure, we suggest that the sub-measure iii (sustained employment for learners) relating to Job Seekers Allowance and Employment and Support Allowance claimants should be three months in employment within 24 months of the start of their learning for learning aims lasting up to one year and within 36 months for learning aims lasting up to two years.

Question 2: Do you agree that for accountability purposes the headline measure covering all levels of provision should be used?

We do agree that for accountability purposes the destination headline measure covering all levels of provision should be used. Although fewer learners learning at lower levels enter employment, many still do find sustained employment and provider delivery will have contributed to this success. Within the headline destinations measure, the lower likelihood of learners at lower levels of entering sustained employment may be balanced out by them being more likely to enter sustained learning, although this is something that will only be confirmed over time and we welcome plans to explore whether it would be possible to break down data by levels to allow greater transparency.

A common criticism of scrutiny being given to outcomes is that it drives providers to give greater levels of support to those learners more likely to secure the outcomes; for example, if scrutinised on sustained employment outcomes, providers may be tempted to give greater help

to learners who are most likely to find and retain work. This has been termed 'creaming and parking' in other publically funded services where this phenomenon has been known to occur. Creaming and parking is a risk where outcome measures are blunt; encompassing people, who because they have little chance of succeeding against the measure, should not be included in the measurement. A relatively simple means of avoiding this risk with these measures is to only include learners towards the result whose intention on the day before their learning begins (as indicated on the ILR system) is the outcome being measured. This would also ensure that providers are not disincentivised from working with learners who are at an early stage of their journey towards employment as their intention is likely to be entry into further learning and they will therefore not count towards and pull down the provider's sustained employment result if they do not find sustained employment. It will also have the added advantage of retaining Apprenticeship learners towards the sustained employment measure but removing the potential distortion that would otherwise arise from including people already in work who remaining in work after their learning.

To counter any possible perverse equality impacts we feel it would be helpful to introduce the outcome measures as part of a balanced score card which also includes input measures relating to who participates and the level at which they participate. This will ensure providers are measured on the extent to which they serve and meet the needs of everyone in their community as well as the extent to which they secure helpful outcomes for those who do participate.

To counter providers' likely diversion of resources away from types of provision where the purpose is not to support employment acquisition or progression in work or learning, for instance, personal efficacy provision such as financial capability learning, it may be necessary to debate and discuss the use and size of the £210 million Community Learning Fund to allow greater delivery of these forms of learning within Community Learning provision.

Only counting learners towards the earnings success measure who might be expected to increase their earnings following learning would more precisely target this measure for instance, it could usefully apply to people on Apprenticeships or other forms of work based learning but not apply to people undertaking English or maths or other provision that arguably helps people remain in work rather than increases wages.

Question 3: What should be the main features of a measure which records achievement of GCSEs in maths and English? Because attainment of GCSE in maths and English is attainment at a particular level i.e. level 2, the measure needs to take account of an individual's starting level, if it is to be a true reflection of a learning provider's effectiveness. We suggest that only learners identified through initial assessment of being able to achieve GCSE maths or English within the duration of their programme of study are included in this measure. Within this cohort, the success measure should be based on improved grade rather than the attainment of a particular grade(s). This would ensure that learning providers did not only select learners they deemed easily able to achieve GCSE at grades A to C.

Question 4: What are your views on using performance tables for post-19 provision as an effective means of comparing provision? The transparency of information is important - as much as possible should be published as often as possible, in order to help individuals and employers make informed choices. Performance tables have been used for some time to present schools' attainment data. This is straightforward in schools because they all deliver the

same National curriculum to learners of similar age i.e. like is being compared with like. The more diverse nature of adult further education providers and the greater diversity of adult learners' ages and prior attainment make it much more challenging to formulate meaningful tables for adult further education provision. . We need a means to compare providers but we need a sophisticated solution to achieve this.

We are also concerned that there may be detrimental impacts from the operation of a market described in the consultation document i.e. that learners and employers invest their money and public money follows their choices in providers and qualifications which deliver strongest outcomes and divert money from poorer provision. The impact of funders and customers exerting choice could exacerbate negligible small differences between providers. If funding is diverted to a very slightly higher performing provider, that provider will be able to make investments that cannot be afforded by a neighbouring very slightly lower performing provider. Through these investments the slightly better performing provider becomes better whilst the neighbouring provider doesn't change. Subsequently, funding is even more likely to be diverted to the better performing provider and as a result it gets even better. After a certain number of cycles, a patchwork of provision can result where one provider markedly outperforms its neighbours not because it began as much more effective but because its funding has been very different to its neighbours. The only way to then counter this effect would be to strategically invest in poorer performing providers to ensure they can keep up.

Question 5: What contextual data/information (if any) should be published alongside the data to ensure that learners and employers are able to make an informed decision about the relative performance of providers? We agree that contextual information should be made available alongside the publication of performance against headline measures or sub-measures. Its intention should be to show to what extent the performance is influenced by the provider's context and to what extent the data is influenced by the provider's effectiveness. Additional information should therefore encompass every external factor that has an impact on performance including:

- An indication of the health of the local labour market and performance benchmarks for other learning providers with similar labour markets
- An indication of the availability of opportunities for sustained learning and performance benchmarks for other learning providers with similar learning availability
- Average earnings for people for people entering new occupations from further education
- A description of the learner cohort including:
 - what provision has been delivered to enable users to distinguish between land based colleges, FE colleges, specialist ITPs etc;
 - what proportion had prior to their programme of study achieved GCSE English and maths A to C on entry and/or five GCSEs grade A to C and /or the average best 8 GCSE attainment (in line with the new development in schools performance data);
 - what proportion of learners undertook programmes of study that provided skills that could be expected to lead directly to employment;
 - what proportion undertook programmes of study that provided skills that usually lead to further learning; and
 - what proportion of learners had additional learning needs.

In addition, providers themselves should be given an opportunity to make a statement about their data as a form of right to reply where they feel the contextual information does not fully explain their performance.

Question 6: Do you agree that headline measures should be included on individual providers' websites? It is important that performance data is made very accessible to ensure that all learners have the opportunity to be equally informed. However, we question whether it would be appropriate to make just the headline accountability measures available through a widget on each provider's website without sub measures and accompanying additional contextual information which may explain and justify lower performance in comparison to a neighbouring provider. We would prefer a link on providers' websites through to a website dedicated to hosting the performance data for every provider. If the link took the viewer to a webpage specific to the provider, this web page would have the space to display all the sub-measures and additional information in addition to the headline success measure performance pertaining to that provider.

Wherever the data is presented, it would be appropriate to give the provider a right to reply where they feel they feel their performance was affected by factors beyond their control that are not fully explained by the contextual information.

Question 7: Do you agree that the measures as currently proposed will help governors and non-executives to hold colleges and providers to account and challenge underperformance? Although we agree that the measures as currently proposed will help governors and non-executives to hold colleges and providers to account and challenge underperformance, we anticipate that senior and operational managers and practitioners will be very keen themselves to use the newly available performance data to inform adjustments to their curriculum and delivery format. And these are just two of the many benefits that could be gained through the availability of these new forms of performance data.

Within our recent publication, *A guide to tracking learner destinations*, NIACE, 2014, we reported that learner destination tracking is beneficial for providers as:

- robust quantitative evidence of positive outcomes enables providers to prove the value of learning when lobbying for funding;
- destination data can inform the evolution of provision; and
- destination data enables more effective equalities analyses.

NIACE itself has already taken the opportunity to widely publicise the finding reported in *Outcome based Success Measures: Experimental Data 2010/11*, BIS, 2014, that 44% of learners who were claiming Job Seekers Allowance or Employment and Support Allowance had gained sustained employment following completion of a full level 2. We look forward to utilising future data releases to further raise the awareness of policy makers and other stakeholders to the tremendous positive impact of skills acquisition.

Question 8: Do you think results should be published at qualification level and/or at qualification by Awarding Organisation too? If we were to compare the performance of qualifications from different subject areas, we would actually be using qualifications as a proxy for comparing the destination and earnings outcome of different forms of learning. The destination and earnings outcomes from different forms of learning are always going to be primarily dependent on labour market demand for the skills acquired. Although it is important for learners to have a means of finding out about the labour market demand for the skills they might acquire, it may not be helpful to present this as pertaining to qualification performance as this might give the false impression that the qualification had an influence upon it. Comparing the performance of different types of qualifications within the same subject area would be

interesting. However, although qualification type will influence destinations and earnings outcomes only to a small degree in comparison to many other variables such as labour market dynamics. Therefore we would be surprised if the data was sensitive enough to show the difference due to one type of qualification in comparison to another. We also believe the data is very unlikely to be sensitive enough to show differences attributable to the same type of qualification offered by different types of awarding organisation. This is primarily because qualifications of the same type in the same subject area can be very similar; many being based on the content of the same National Occupational Standard (NOS). Even when not based on a NOS, awarding organisations often come to similar conclusions about helpful content which again causes qualifications to be similar.

Question 9: Do you have views on where and in what format this information should be published? As we have suggested in our response to question 8, it may be better to provide labour market demand information for learners rather than qualification performance data. Labour market demand information would be most helpful to learners when they are exploring their options and making decisions about what they might like to learn. Therefore it should be made available alongside description of provision. Within their prospectuses, many providers already describe the occupations learners could enter upon course completion. It would be helpful if providers gave an indication of the extent of labour market demand for each of these occupations.

If the data was sensitive enough to allow a comparison of the performance of different types of qualifications within the same subject, it might be helpful to make this data available at a national level through an annual report. The information might of interest to providers who, mindful of new minimum standards involving destination outcomes, might like to choose the qualification type they offer based on its destination outcome performance.

We think it very unlikely that the destination and earnings performance data will be sensitive enough to show differences attributable to the same type of qualification within the same subject offered by different types of awarding organisation. However if it was, as the performance relates to the awarding organisations' offers, the data should be presented either by the awarding organisations themselves or by Ofqual through their *Register of regulated qualifications*.

Question 10: Are there are other breakdowns such as different reference periods or delivery by subcontractors that could be used by local players (e.g. LEPs)? We cannot suggest any data breakdowns that would be helpful at this point but it is likely that these will be useful in the future and the facility to break the data down further would be welcome.

Question 11: Do you agree with these principles for future Minimum Standards? We agree that the principles suggested provide a helpful starting point towards a new set of minimum standards based on the outcomes of learning. However, we suggest an additional principle that the standards should be:

- **Appropriate:** only measures that are substantially within the provider's control should be used within the new set of minimum standards and only learners for whom the measure is applicable should be counted towards performance against these measures.

We have in our response to question 2 described why it is only appropriate to count learners towards a success measure if their intention on the day before their learning begins (as indicated

on the ILR system) is the outcome being measured. It would be unfair to base minimum standards on measures that include learners who are unable or do not intend to use their learning to meet the criteria of that measure. In our response to question 1 we have made suggestions to ensure that the outcomes measure definitions encompass do not exclude any learners helped by a provider to succeed against that measure.

When using minimum standards based on outcomes, in recognition that outcomes may be influenced by factors outside a provider's control, there needs to be scope within the methodology for any specific measure to be discounted towards the minimum standards when it can be demonstrated that it has been greatly impacted by the context in which the provider is working.

We feel that although learning can support earnings change, this is primarily in the gift of employers. Therefore although we welcome the creation of a success measure for earnings change to enable providers to demonstrate how learning has led to learner progression in work, we are unsure whether, and suggest research is carried out to determine if, the earnings change is sufficiently within the provider's control for it to be included in the new set of minimum standards. Because learning to support earnings change is such new ground for providers we believe they would benefit from an innovation fund and support programme to test new approaches to delivering this.

Question 12: Do you have specific views on a future Minimum Standards methodology?

For the time being, we feel it would be best to focus on the development of appropriate success measures and only when these have been fully tried and tested and provider's reactions to them are known, should we establish a methodology for, and act upon poor performance against, minimum standards. Introducing new minimum standards based on the proposed outcome measures from 2016/17 seems very soon. We have suggested changes to the definitions used for these outcome measures and it would be necessary to see experimental data over a reasonable time period against these refined success measures before they could be adopted and then incorporated within a new set of minimum standards.

A longer period of time will also allow a counterfactual analysis for each outcome measure e.g. for the sustained employment sub-measure this would tell us how many of those who get sustained jobs following learning would have done so anyway without the learning intervention. This would be helpful in considering value for money and in informing curriculum design. The Skills Funding Agency may wish to mirror to an extent what the DWP has done in setting minimum benchmarks based on an estimated counterfactual.

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