

A Consultation Paper on the establishment of a new
Further Education and Training Authority

– SOLAS –

An Seirbhísí Oideachais Leanúnaigh Agus Scileanna



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Message from the Minister for Training and Skills, Ciaran Cannon TD

I feel privileged to have been appointed as Minister for Training and Skills, with responsibility for further education and training. I have seen at first hand the incredible work that goes on across the country, in training centres, schools, adult education centres and elsewhere. I have witnessed the dedication and commitment of the thousands of staff and I have seen the transformational change that education and training can bring to learners.

The Implementation Group which I chair is charged with drawing up an Action Plan to implement a similar transformational change across our sector – the biggest change in further education and training since the establishment of Vocational Education Committees. I do not underestimate the scale of the task and the challenge that represents for all of us but we cannot afford to underestimate the tremendous opportunity we have to build a single, integrated sector that can respond to learner needs while meeting national needs.

This will mean a lot of hard work for all of us. The first part of that work has commenced. We are drafting the Action Plan but we cannot do it alone – we need your input. Hence this Consultation Paper which sets out our thinking so far and invites you to submit your views. I urge you to complete the survey and let us know what you think. It will help us draft a Plan that addresses the challenges and identifies the opportunities so that – together – we can build a flexible, modern further education and training sector that we can all be proud of.

Ciaran Cannon TD

Minister for Training and Skills

21 December 2011

Government Decision

1. On 22 July, 2011, the Government decided to create new authority to be responsible for the coordination and funding of Further Education and Training (FET) in Ireland. Government recognised the continuum between further education and training and decided to integrate them into an FET sector under SOLAS on the basis that an integrated service would be both the most efficient, from a value-for-money point of view, and the most effective, from an outcomes and quality point of view, model to drive the change agenda of ensuring that FET programmes are fit for purpose in the 21st century economy and labour market as outlined in the National Skills Strategy.

What will SOLAS be and what will it do?

2. SOLAS will be a body under the aegis of the Department of Education and Skills (DES). SOLAS's mandate will be to ensure the provision of 21st century high-quality further education and training programmes to jobseekers and other learners. Under this mandate, SOLAS will implement the policies and strategies in the FET sector to ensure that the unemployed in particular are offered the upskilling opportunities necessary to get back into employment.

Why this consultation paper?

3. As part of its decision, the Government decided to immediately establish a SOLAS Implementation Group. The Group is chaired by the Minister for Training and Skills, Ciaran Cannon TD, and is charged with the preparation of an Action Plan. The Action Plan will set out the 'roadmap' for SOLAS so that on establishment and with the DES, it can implement the significant transformation programme needed to deliver the necessary changes.
4. The establishment of SOLAS will mean significant change within the sector. There are currently 33 Vocational Education Committees (VECs) which are statutory education authorities which have responsibility for further and adult education, youth work and the management of second level schools. As part of the change, FAS Training Division will transfer to the VECs and those VECs will report to the new authority SOLAS in respect of FET. Alongside this change, FAS Employment Services are transferring to the Department of Social Protection (DSP) as part of the establishment of the National Employment and Entitlements Service (NEES). More broadly, the 33 VECs are being rationalised into 16 Local Education and Training Boards (LETBs) and the existing awarding bodies (FETAC, HETAC, NQAI and IUQB) are being amalgamated into Qualifications and Quality Assurance Agency Ireland (QQAAI).
5. The implementation of any one of these reforms would be complex and challenging in their own right. Taking into account the relationships and dependencies that exist between each of these elements, the implementation of this wider reform process will prove extremely challenging and will require a dedication of purpose and a well planned programme of change.

6. The Group has therefore decided to undertake a process of consultation with key stakeholders within and without the sector. In order to facilitate this process, the Group has drafted this Consultation Paper, which identifies the key challenges to be addressed and a selection of questions and policy options, upon which inputs should be based.
7. The Implementation Group set up sub-groups to deal with the key policy areas identified below. These sub-groups will use the results of the consultation process in their work and they will also be considered as part of finalising the Action Plan which SOLAS will implement.

What have we done already?

8. The Group has ensured that the legislative process is already underway. We expect that the legislation will be published in the New Year. The DES will coordinate the drafting of the SOLAS Bill with the drafting of the legislation for the establishment of the LETBs and it will be the subject of the normal consultation procedures associated with legislation.
9. Dedicated transition teams are being established in FAS and the VECs to work on the change programme that will be required in the context of the establishment of SOLAS and the transfer of the FAS Training Division to the VECs.
10. We have proposed that on statutory establishment, SOLAS will publish a draft 3-year strategy for consultation. This strategy will be based, at least in part, on the results of this separate but related consultation process. It will outline how SOLAS intends to deliver a demonstrable improvement in the “customer experience”, along the lines set out below.

Structure of the Paper

11. In analysing the requirements of the transformation agenda, and how to structure the Action Plan, the Group has identified four key policy areas. These are:
 - How we manage, fund and administer FET
 - How we decide what courses to deliver
 - How we guide and support learners and potential learners in making their choices
 - How we manage and support our staff
12. For each of these policy areas, there are short-term and long-term issues to be addressed or resolved. By short term issues, we mean the immediate and practical issues that must be addressed in setting up SOLAS and in integrating FAS training into the VEC structure.
13. By long term issues, we mean challenges that the DES and SOLAS will need to address over the period of the 3 year strategy and beyond in order to ensure we have a 21st century FET sector, fit for the purpose of fulfilling the skills requirements of the jobs of tomorrow.
14. While we appreciate and value your input in relation to all FET issues, this consultation paper is mainly focussed on the long-term challenges facing the DES, SOLAS and LETBs in

modernising the delivery of FET in Ireland. We would like your views on how DES and SOLAS should address these issues.

Improving the “customer experience”

15. We are keenly aware that this ambitious agenda imposes significant burdens on our staff in a period when resources are diminishing while demand increases. However, we are equally keenly focussed on the need to improve the “customer experience” for jobseekers and other learners who need or want to engage in FET in order to build their skills, to enter or re-enter the labour market, or improve their life in general. The improvement of the customer experience - to make sure that unemployed people can access the programmes they need, to ensure that the courses are of high quality, to upskill and nurture the staff who deliver the programmes - is the main driver behind this change agenda.

Policy Area One: How we administer and fund Further Education and Training in Ireland

16. This part of the plan examines how we administer and fund FET in Ireland. We give a brief description of what way we want the system to look and why and we outline what we have been doing to achieve it. We would like your views on what else we should do and how we overcome the challenges we have identified in achieving our goal.

Strategic Rationale

17. The way we fund and administer FET in Ireland can affect the way it is delivered. Currently, there are a range of systems in place to fund and administer a range of separate but related FET programmes. This imposes burdens on administrators throughout the system without requiring or facilitating a concomitant enhancement of standards or quality. It has led to a ‘silo-based’ FET system, which works against integration, and does not facilitate collaboration or co-operation across programmes or within areas.
18. Conversely, we believe that a simplified and integrated system of funding and administration can free up resources which can be used to enhance and expand ‘frontline’ provision. Better funding and administrative systems facilitate better programme quality and enable us to make better evidence-based policy decisions.

What way does the system look now?

19. Currently, the Government allocates funding to the DES, separately for FAS and for FE. The Department allocates that funding to FAS, together with a range of target outputs, priorities and other policy matters that the funding should address. FAS, in turn, allocates the funding to its own centres and staff, on the basis on an activity days model, and to private providers under a centralised procurement system, as part of contracted training. The DES also allocates funding to VECs who manage the delivery of all FE programmes under a range of systems (volume of tuition, approved places, non-pay grants). FAS monitors and reports on expenditure and activity in its areas and by its contracted providers. Each VEC monitors and reports to the DES on expenditure and activity in its areas.

What we have done and what we need to do in the short-term

20. The funding and administration sub-group is already examining our existing structures in preparation for the establishment of SOLAS. The DES is examining the Vote structure with a view to rationalisation. In FE, new operational guidelines for part-time programmes seek to integrate delivery and administration and new pilot data collection systems seek to reduce the administrative burden.
21. The shift away from two separate systems to funding all FET through SOLAS is a complex task requiring inputs from different areas of the DES and FAS. Administration staff in DES, FAS and VECs will have a range of challenges to address in the short-term as we seek to minimise any disruption to services and maintain provision as we transition to the new arrangements.

What way should the system look?

22. As part of the annual Budget process, the DES will receive its annual allocation, including that for FET. SOLAS will, on the basis of an annual strategic plan agreed with the DES, allocate that funding to LETBs and possibly other providers. Funding to the LETBs will be on the basis of Service Level Agreements which will set out what is to be delivered.
23. Of particular importance from a funding and administration perspective is the part that private providers, whether they are for-profit or not-for-profit, will play in delivering FET in Ireland. While together VECs and FÁS currently deliver over 70% of FETAC awards annually, there may need to be scope to involve other providers so that short-term or immediate or unforecasted needs can be met, for example, under a Labour Market Activation Fund (LMAF) model.
24. We want a simple and easy to understand structure of administration that makes good use of technology and complies with national and international standards of corporate governance. We want a simple and easy to understand funding system that enables flexibility on the part of LETBs in delivering relevant and useful FET programmes but which meets the highest corporate governance and financial governance standards. Both the funding and administration system should only collect information and data that is required and useful for policy development and financial reporting.

What do you think? What are the challenges we face?

25. We would like your views on the following questions related to funding and administration:
 - How can we use funding and administration structures to improve outputs and outcomes? Is there a particular funding model which works best?
 - How can we better measure value-for-money?
 - What criteria or requirements should be included in Service Level Agreements?
 - How can we ensure an appropriate mix between public and private provision?

- How can we improve our IT systems in an integrated way while avoiding the risks associated with big IT infrastructure projects?

Policy Area Two: How do we decide what courses to deliver?

26. This part of the paper deals with how SOLAS can ensure the provision of high-quality 21st century FET programmes which respond to the needs of learners and the requirements of a changed and changing economy. Like with the first policy area, we give a brief description of what way we want the system to look and why and we outline what we have been doing to achieve it. We would like your views on what else we should do and how we overcome the challenges we have identified in achieving our goal.

Strategic Rationale

27. Currently, through the VECs and FÁS, we provide for the delivery of a wide range of courses, from unaccredited hobby and pastime courses to highly specialised animation and medical devices courses. This includes a range of adult and community education courses which cater for the literacy, numeracy and ICT needs of adults. We need to ensure that firstly, the courses we fund meet the individual needs of learners, whether they are core and generic skills courses, or specialised and technical courses; and secondly, that the courses we fund lead to awards in areas of skills needs or where there are employment needs. Simply put, we need to ensure an appropriate balance between occupation-specific and generic skills, as well as retaining the ability to change provision to focus on current and near-future skills needs of labour market and enterprises. This is the supply side.
28. On the demand side, we need to know the profile of potential learners overall, e.g., educational attainment, employment history, their abilities and desires, where they are, etc. We also need to understand the social dynamics in play so that through appropriate FET, we can enable everyone to achieve their full potential. Education is a key driver in social, as well as economic development.

What way does the system look now?

29. On an annual basis, FÁS, with advice from its Strategic Labour Market Research Unit, and inputs from the EGFSN, arranges for the provision of a range of courses. Through its Memorandum of Understanding with the Department of Social Protection, unemployed people can be referred on to FÁS courses. People can also visit FAS offices and enrol in courses.
30. VECs deliver further education programmes in line with operational guidelines (for part-time programmes) and circulars (full-time programmes). Some programmes are subject to an application process (BTEI, PLC). VECs network with local and regional stakeholders, including employers and non-governmental organisations, as well as nationally, with various representative organisations, through the Irish Vocational Education Association, in order to inform delivery. People visit VECs to enrol in courses and there is a guidance service available.

What we have done and what we need to do in the short-term

31. FÁS has developed a new training strategy including the introduction of a career themed approach to training to inform FÁS course provision in meeting identified current and emerging labour market and skills needs. VECs and FÁS have been developing and re-developing curricula to meet the needs of FETAC's new Common Awards System (CAS). FÁS has developed new courses to meet emerging labour market and skills needs in the areas of services, ICT, medical devices, food, biopharma occupations and green energy while the DES and VECs have developed new operational guidelines for part-time FE programmes, catering for 130,000 learners.

What way should the system look?

32. The Service Level Agreements between LETBs and SOLAS will be informed by the latest information available across a range of issues. This would include Census information regarding the profile of the population, Live Register information (both national and local), and structured input from NEES as well as structured input, including through annual and periodic national and thematic reports, from the EGFSN and Forfas.
33. This information is not enough, however. We need a system that can provide SOLAS with real-time and periodic information on activity (programme delivery) as well as the profile of learners, so that delivery can be monitored and evidence-based policy decisions can be made. We also need to provide for 'learner tracking' which would enable us to research the effects of education and training on a person's life, e.g. earning capacity or career development.
34. We also need to promote and encourage the development of new programmes but at the same time we must be strategic about how and what programmes are developed. This also brings with it the challenge of staff to deliver those programmes, which we deal with further on in the paper. In developing new programmes, we would need local analyses as well as national and international research in addition to input from other stakeholders, like employers or bodies like the IDA and EI.

What do you think? What are the challenges we face?

35. We would like your views on the following questions related to the courses we deliver:
 - What information does SOLAS need to inform the delivery of courses? How can it access that information?
 - How can SOLAS encourage the design of new courses for the jobs of tomorrow?
 - How can SOLAS encourage the appropriate provision of basic skills courses and provide for the important role of community education?
 - What role can IT systems play in this? How can we improve our IT systems while avoiding the risks associated with big IT infrastructure projects?
 - There are a range of other providers of FET programmes – what way should SOLAS and LETBs engage or deal with those bodies to ensure a joined-up approach?

- How can SOLAS encourage new programme delivery methods, like distance learning or online provision, and what courses can be appropriately delivered through such methods?

Policy Area Three: How we guide and support learners and potential learners in choosing the right course

36. This part of the plan deals with how SOLAS will improve the way people access further education and training. It sets out the current arrangements, the work already underway and steps that should be taken in the medium term. The ultimate goal is for an integrated, individualised service so that people can access the further education and training they need.

Strategic Rationale

37. The problems with the current arrangements are well-documented, including in this paper. Our fragmented system must be ‘navigated’ by the savvy person. It is not ‘user friendly’ but is based on systems of administration. While our staff is committed, levels of skills and expertise vary. This means that the level and type of service varies from area to area and within and between welfare offices, FÁS and the VECs. The first step into further education and training is often the most difficult, even more so for those experiencing unemployment for the first time, so the first interaction is crucial.
38. Guidance refers to “a range of activities designed to assist people to make choices about their lives and to make transitions consequent on these choices”¹. The National Guidance Forum said that “guidance facilitates people throughout their lives to manage their own educational, training, occupational, personal, social and life choices so that they reach their full potential and contribute to the development of a better society. It is central to an individual’s (learning) choices and should be an integrated element of all further education and training. While the provision of information is separate to guidance counselling, they both must be provided in the context of a single concept of guidance as a support to decision making.
39. At national and EU level, it is recognised that effective guidance is fundamental to ensuring that people get the education or training intervention they need and that they have the best possible chance of succeeding in their chosen course. An effective guidance service is not separate to other interventions but an integrated part of them.

What have we done and what we need to do in the short-term?

40. From 1 January 2012, the 5,000 staff in the national network of D/SP offices will be working alongside the national network of 1,000 Community Welfare Services (CWS) in 800 locations and 700 FAS (Community) Employment Services staff in 70 locations. The complex work of integrating all these staff into what will become the NEES is continuing.

¹ *Learning for Life*, White Paper on Adult Education (DES, 2000)

Pilot projects are underway in Dun Laoghaire and Tallaght with local DSP, FÁS, VEC and other stakeholders developing the NEES model 'on the ground'.

41. The DSP has developed a profiling model following years of research and testing by the ESRI. It has been found to have a high level of accuracy (predictive capacity) by international standards. The model uses a set of characteristics, combined with coefficients reflecting their relative importance, to statistically calculate an unemployed persons' probability of exiting (PEX) the Live Register within 12 months. The IT functionality was tested in Dun Laoghaire Local Office from February 2011. It was rolled out to 3 further offices (Tullamore, Sligo and Kings Inn) in July and August 2011 for ongoing testing and validation of the process developed in Dun Laoghaire. National rollout of the profiling functionality will commence in 2012 based on the outcomes and learning from the 4 offices.
42. There are 100 Adult Education Guidance Initiative (AEGI) guidance counsellors in 40 locations nationwide, available to Adult Literacy, Community Education, Back to Education Initiative and Vocational Training Opportunities Scheme participants. There is a funding allocation for guidance (and counselling and psychological services) for the 130 Youthreach and Senior Traveller Training Centres and VECs manage that locally. Finally, guidance is also provided for in PLC through the teacher allocations process.
43. Interim protocols to enable a standard framework for the referral of unemployed people to further education programmes have been agreed. This framework, which will be operated locally by VECs and local welfare offices, complements the existing referral protocol between welfare offices and FAS training programmes, and will enable further education to play a more active part in activation.
44. The SOLAS sub-group is engaged actively in drafting formal protocols, both for NEES and SOLAS at a national, central level, and for LETBs and local NEES offices, at a local and regional level.

What way does the system look now?

45. Currently, the only formal referral system in existence is for unemployed people who are referred on to FÁS training programmes under the National Employment Action Plan (NEAP). That will not change with the transfer of FAS (Community) Employment Services and HSE Community Welfare Services staff to the D/SP. Under this system, people so referred can be 'tracked' and their progress monitored. As detailed above, there is a new protocol for referral of unemployed people into further education.
46. People, unemployed or otherwise, self-refer in large numbers, although there is no quantitative data to support this across all FET. Through websites, local radio advertisements, promotional activities by CSOs like NALA or AONTAS, and through word-of-mouth, people walk in to VECs and FÁS training offices seeking opportunities.

47. In VECs and FÁS, generally a person walking in is given information about available courses. In VECs, the AEG service is available to participants in most further education programmes and there is a separate guidance provision for those participating in others. Protocols are in place which set out the intensity of the guidance input across those programmes.

What way should the system look?

48. The system should be simple, practical and not resource intensive. It should be based on meeting the needs of jobseekers and other learners and helping them to understand their needs. The system needs to be clear on what is expected and required of learners and administrators but should allow for local variation and innovation so that it can be tailored to individual needs. It should facilitate progression from NEES to LETBs (if that is appropriate) and from LETBs onwards into employment. Above all, the system should be robust and fair.
49. The Group feels that it is this policy area where the “customer experience” policy driver is most important. On this basis, the Group agreed on a number of ‘benchmarks’, which any system of referral and guidance should be based on:
- Every person who is a client of NEES or self-refers to an LETB would be eligible for an initial assessment of needs;
 - Based on that assessment, NEES would refer clients to the local LETB for enrolment on an appropriate course that caters to those needs while also meeting national skills needs;
 - All LETBs would operate a consistent policy with regard to enrolment,
 - All VECs would publish their policies and an Equality Checklist;
 - All learners should have a responsibility to engage genuinely and sincerely in whatever programme they are enrolled on;

What do you think?

50. We would like your views on the following questions related to how we guide and support learners into FET programmes:
- Do the benchmarks that the Group has set make sense? Are there others?
 - How can we simplify the system of eligibility criteria for different FET ‘programmes’ so that we minimise delays and differences, perceived or otherwise, in the administration of income support and participant allowances;
 - How can we marshal our often fragmented system of referral and guidance into an integrated service while maintaining resources in critical areas;
 - Course placement based on course availability rather than participant needs or desires and continued delivery of courses that are not relevant to national skills needs.

- What do we need to do to ensure appropriate ‘tracking’ of learners between NEES and LETBs and between LETBs to minimise information gathering and maximise progression opportunities?

Policy Area Four: How we manage and support our staff

Strategic Rationale

51. Our staff is our most valuable resource. Thousands of instructors, teachers and tutors are responsible for delivering FET programmes to hundreds of thousands of learners annually. While staff will be employed by LETBs, SOLAS will have a vital role in nurturing and developing that resource so that we can develop and improve the quality (and quantity) of programmes delivered. International research clearly demonstrates that the quality of the staff delivering tuition is a fundamental determining factor in both the quality of the programme and the outcomes for learners.
52. The management of our staff is a very real issue given the immense changes the FET sector is currently undergoing. Not only has a substantial number of FAS staff moved to the D/SP as part of the establishment of NEES, but the remainder will be transferred to VECs or SOLAS as part of the establishment of SOLAS. Alongside this, VEC staff are being re-organised into new LETBs. Constraints in the shape of the moratorium on public service appointments and Employment Control Frameworks restrict our capacity to respond but our staff has consistently demonstrated commitment and dedication.

What have we done and what we need to do in the short-term?

53. Pilot scoping projects have commenced in Cork and Dublin as a means to identify in a real, practical way the nature of the issues that will arise in the context of the integration of the VECs and FAS training centres and is expected to be completed shortly. It is expected that this pilot will highlight the organisational, funding, IR/ HR, customer relationship, and ICT issues that will arise as part of this amalgamation process.
54. The DES provides for CPD for staff in its programmes through a range of different resources, including direct grants to VECs, through the Professional Development Service for Teachers, and by way of grants to organisations like NALA and Waterford Institute of Technology.

What way does the system look now?

55. Currently, there is an estimated 9,000 staff employed in a range of roles in the FET sector across FAS and VECs. There are a range of different categories of – instructors in FAS, teachers in PLC, “tutors” in adult education as well as a range of categories of management staff – with a range of different terms and conditions, qualifications, experience and expertise. These staff undertake a range of tasks and duties, depending on the type of programme and type of centre they are employed in, and may work part-time or full-time, over a calendar or an academic year, depending on the nature of their employment.

What way should the system look?

56. The only thing that learners in FET have in common with each other is that they are all very different – both in their circumstances as well as their motivation for being in FET. Our staffing profile matches this variety and it is valuable for that reason. However, we do need to establish benchmarks for terms and conditions of employment, and for the qualifications and experience required of staff. This would undoubtedly improve the learning experience for learners, make management easier but also improve the working experience for the staff themselves. SOLAS needs to be strategically involved in aligning staff development resources to national needs so that we have a quality FET workforce.

Important Point

57. The Implementation Group is very conscious of our obligations to existing staff under the Croke Park Agreement. We acknowledge most sincerely the work that existing staff have done and continue to do under difficult conditions. Nothing in this paper should be construed as impinging upon any industrial relations or employment rights process that existing staff or their representative organisations are or might be involved in as part of the establishment of SOLAS.

What do you think?

58. We would like your views on how we can support and manage our staff:

- What kinds of qualifications would be required of staff in the FET sector – pedagogical and otherwise?
- What kinds of skills would staff need, in terms of management, as well as delivering tuition?
- What should be the nature and extent of the SOLAS role in managing and supporting staff?

Transversal Issues

59. There are of course a number of issues that cross all policy areas or that are important enough to warrant separate consideration. The Implementation Group has identified the following as such issues and would welcome the views of stakeholders on how to deal with them.

Improving the customer experience overall

60. The Implementation Group, in considering this, feels that SOLAS should publish a *Learner's Charter*. The Charter would outline basic rights and responsibilities for learners and LETBs or other SOLAS-funded providers so that learners could be sure of a standard and consistent level of service nationwide. The Charter would make provision for, amongst other things:

- Learners would have a right to make feedback on their participation in courses
- The publication of a summary of feedback received from learners on their participation in courses;

- The publication of a range of metrics for LETBs and SOLAS-funded providers on an annual basis;
- Provision for structured engagement with organisations representing learners and potential learners which would be fed into the policy-making process.

Question

- What other things could SOLAS do to improve the customer experience overall?

Reviews of provision

61. On full establishment, SOLAS will have responsibility for a wide range of FET provision. This includes Youthreach for early school leavers under 20 years of age and prison education as well as programmes for those with disabilities. Some of these programmes are so separate that they might warrant separate administration structures while others that are separate might warrant integration into overall structures. We would welcome your views on the following:

Questions

- Should Youthreach and Community Training Centres be merged and should SOLAS continue to administer them?
- Should FET delivered in specialised or atypical outreach settings like prisons or care services be managed by SOLAS or another Department or agency?
- How can we provide adequately for learners with disabilities and how can we improve the system we have.

Finally...

62. Thank you very much for reading our Consultation Paper and we sincerely welcome any input you make. In doing so, you are helping to develop further education and training provision in Ireland. If there is anything that you feel we have left out, we would welcome you highlighting it.

Appendix 1

SOLAS Implementation Group

The SOLAS Implementation Group comprises representatives of the Department of Education and Skills, the Department of Social Protection, FÁS and the Irish Vocational Education Association.

The terms of reference for the SOLAS Implementation Group are:

- to operate as a Steering Committee to oversee the process involved in the setting up of SOLAS - the new Further Education and Training Authority;
- to report to the Cabinet Committee on Economic Recovery and Jobs on progress with implementation of the Government Decision(s), initially in the Autumn of 2011, and on a regular basis thereafter as progress is made with the Action Plan;
- to draw up an Action Plan to implement the changes required, including the disbandment of FAS; and
- to monitor implementation of the Action Plan and where milestones are not met to recommend remedial action.