Organisational approaches to the 'professionalisation' agenda: planning the provision of the new ITE qualifications for the FE sector

Janet Broad

Institute of Education LONCETT

Abstract

Situated within the context of policy change in the Lifelong Learning Sector, this article is based on the LONCETT (London Centre for Excellence in Teacher Training) research strand exploring organisational responses to policy challenges and the impacts on the delivery of Initial Teacher Education (ITE) for the sector. It builds on and further develops three themes reported in year one (Wooding, 2007): impact of the new requirements for QTLS/ATLS; impact on delivery patterns and organisational collaboration; and organisational responses to existing staff first employed prior to 2007. Findings suggest a positive view of the new qualifications in terms of enhancement of teachers' professional standing. Nevertheless, the introduction of three levels of qualification: preparing to teach, certificate, and diploma in teaching have caused confusion, especially in light of the proliferation of job specifications, titles and practices within Further Education (FE) noted by Gleeson, Davies and Wheeler (2005).

Key words

Further Education; Initial Teacher Education; Lifelong Learning Sector; Marketisation; Managerialism; Professionalism; Professionalism; Professionalismi, Pr

Introduction

Considerable policy change has been imposed on FE in recent years originating from growing concern that the UK economy would lose out within a global market if a highly skilled workforce was not available or maintained. The resultant plethora of policy documents have placed FE at the centre of strategies to 'up skill' the UK workforce (DfES, 2002; DfES, 2005; DIUS, 2007; Leitch, 2006). This has turned attention to how well the FE workforce is equipped to meet these challenges with government departments voicing growing concern with the professional development needs of FE teachers:

"...a workforce whose skills and career development has often been neglected. There have been unhealthy levels of casualisation, and insufficient emphasis on improving professional skills, on updating subject or occupational knowledge, and on developing leadership skills for the future."

(DfES, 2002: p. 5)

Consequently, a survey of ITE for the FE sector was commissioned. It reported, amongst other things, that current ITE courses 'did not provide a satisfactory foundation' and identified a lack of support for developing subject-specific teaching skills (OFSTED, 2003: p. 2). Responding to this, the government pledged to 'tackle the weaknesses highlighted' (DfES, 2004: p. 2).

This article, situated within this context, is based on research carried out by LONCETT. It forms part of the research strand exploring how organisations are responding to these policy challenges and in turn how this impacts on the delivery of ITE for the sector. It builds on and further develops three themes reported in the first year of this study (Wooding, 2007): the impact of new requirements for Qualified Teacher Learning and Skills (QTLS) and Associate Teacher Learning and Skills (ATLS); the impact on delivery patterns of ITE and organisational collaboration; and how organisations are responding to existing staff first employed prior to 2007.

Three key research themes

Impact of the new requirements for QTLS/ATLS

The new professional framework builds on the 'Further Education National Training Organisation (FENTO) standards' (2001). The FENTO standards set out for the first time a necessity for all teachers in the sector to be qualified (but only applied to those employed after 2001). These new qualifications were divided into three incremental stages. The stage of qualification was largely determined by the number of hours taught, with very part-time, marginal teachers taking stage one, through to full-time teachers being expected to take the complete three-stage qualification.

Lifelong Learning UK (LLUK) superseded FENTO as the new Sector Skills Council (SSC) and developed a new set of standards encompassed by the recent ITE statutory requirements (2007a). Some commentators suggest that this is 'almost "deja-vue'" (Nasta, 2007: p. 2) to the preceding FENTO standards. However, this new suite of qualifications introduced in September 2007 is very different. First, they are much more prescriptive and all ITE programmes fit within the same module structure, meeting the same learning outcomes (LLUK, 2006; LLUK, 2007). The key rationale for this was standardisation. Second, for the first time, the statutory requirements link qualification type to job role rather than number of hours taught; a very part-time teacher who is a course leader is expected to gain the same qualification as those who teach full-time (2007a). An unqualified teacher must gain a full or associate teaching qualification within five years of starting to teach, according to their responsibilities. Third, there are two levels of qualification, dependant on the job role of a

particular individual teacher. The qualification suite is introduced by the Preparing to Teach in the Lifelong Learning Sector (PTLLS) award which every new teacher has gain prior to, or immediately on, starting teaching (2007a). Then the teacher (or employer) decides whether Certificate in Teaching in the Lifelong Learning Sector (CTLLS) or Diploma in Teaching in the Lifelong Learning Sector (DTLLS) is taken. The proliferation of job specifications, titles and practices within FE (Gleeson, Davies and Wheeler, 2005) may make it problematic as to the most appropriate qualification route for individual teachers who do not fall into the category of doing a 'full teaching role' (2007a). Fourth, gaining a teaching qualification is no longer seen as sufficient. Additionally, teachers are required to gain QTLS, after following a DTLLS (or its equivalent) programme or ATLS, after following a CTLLS programme, by evidencing Level 2 equivalent in literacy and numeracy, becoming a member of Institute for Learning (IfL) and evidencing 30 hours (pro rata for part-time staff) Continuing Professional Development (CPD) per year (2007b).

Delivery patterns and organisational collaboration

The traditional delivery pattern for many providers within the LONCETT partnership of ITE deliverers has been to work with Higher Education Institutions (HEIs), delivering separate parts of the preceding FENTO programmes. Ofsted noted of ITE in general that:

Partnership working was a strong feature of inspection findings. University and college partners have worked together effectively to meet legislative and new training requirements.'

(Ofsted, 2009: p. 16)

However, concerns were raised in the first year of this study that this may no longer be possible due to changes to funding arrangements (Wooding, 2007). As the new suite of qualifications are no longer consecutive and incremental, but rather are an 'either/or' choice of CTLLS or DTLLS, this has the potential to impact on the way that the qualifications are funded. Concerns are that collaboration and partnerships between organisations may reduce as organisations are forced by the funding arrangements to deliver the whole or none of the qualification. Evidence of this began to emerge in the first year of the study which reported that organisations were considering their positions in light of the new funding arrangements.

Dealing with pre-2001 and pre-2007 existing staff

The complexity of requirements under the new legislation raises a number of issues for organisations and one of the aims of this particular study is to identify how organisations are dealing with staff first employed at different times; the legislation applies differently to when first employed. For those employed prior to 2001, there is no requirement to gain a teaching qualification; for those employed between 2001 and 2007 there is a requirement to gain a Level 4 teaching qualification; for those employed after September 2007, there is a requirement to gain a teaching qualification and then QTLS/ATLS depending on job role (2007a).

At first glance, this may not be problematic; assumptions may be that teachers in FE will, as a matter of course, gain a teaching qualification early on in their career. However, only 44.3% of teachers in FE currently hold a full teaching qualification; either Certificate in Education or PGCE (LLUK, 2008). The number, however, may be lower as for 20% of teachers, data is not available (LLUK, 2008).

Research methodology

The findings reported on here are from a project carried out by LONCETT between November 2008 and March 2009. Over this period, questionnaires were distributed and in-depth interviews carried out. An electronic questionnaire designed to elicit mainly quantitative data was sent to 30 Human Resource and Staff Development managers of organisations within the LONCETT partnership, extended to the Association of Colleges (AOC) HR network. Twelve organisations responded. Whilst we felt that this was low, it is within usual response rate boundaries (Cohen, Manion and Morrison, 2007) and gave a useful data set for the purposes of the study. The purpose of the questions was chiefly to extend the work carried out by Wooding (2007) so as to begin to identify how much more work had been carried out by organisations to meet the new professional requirements, and to develop an appropriate, more qualitative, interview schedule.

Of the 12 respondents, ten stated that they were predominantly FE and two Adult and Community Learning (ACL). All the FE organisations offered a wide range of provision with all offering some form of ACL provision. Eight offered sixth-form provision. Five providers offered work-based learning. Four of the FE organisations gave examples of other types of provision: Higher Education (HE) for two organisations, Students with Learning Difficulties and Disabilities (SLDD), Train to Gain (TtoG) and projects involving students Not in Education, Employment or Training (NEET).

Responses from the questionnaires were used to identify themes for further exploration using in-depth interviews. An interview schedule was developed following advice give by Foddy (1993). Respondents for the interviews self-selected via the questionnaire where the final question asked respondents to provide contact details if they wished to be included in follow-up data gathering stages. Seven of these kindly agreed. Narrative analysis (Alaszewski, 2006) was used to make sense of the raw data and to identify key themes emerging, using a spiral of coding, analysing, writing and theoretical categorisations (Glaser and Strauss, 1967).

Findings

Impact of the new requirements for QTLS/ATLS

Supporting findings from year one, responses here suggest that the new qualifications and professional status are still viewed positively. From the questionnaire, all respondents stated that the new professionalisation reforms would be likely or very likely to enhance the professional standing of teachers in the Lifelong Learning Sector. However, they could readily identify the benefits of QTLS more clearly than those of ATLS. Seven respondents stated that QTLS would be very beneficial with only two stating the same for ATLS. One stated that ATLS would not be very beneficial and one stated that it would not be beneficial at all.

This was further explored at interview. As currently very few teachers have applied for QTLS and ATLS, organisations were asked how they were using the new ITE qualifications, a prerequisite to gaining QTLS/ATLS. For those teachers with a 'full teaching role', there was a clearly understood requirement to gain the full qualification at a minimum of Level 5 that would lead to gaining QTLS. A typical response to this was:

"All teaching staff required to be qualified at Level 5, with subject specific qualification for Basic Skills lecturers". R1

And clear procedures appeared to be successful at ensuring new staff began their teaching qualification: "All new teachers are enrolled on an ITE course if not fully qualified". R3

However, the proliferation of job specifications, titles and practices within FE noted by Gleeson, Davies and Wheeler (2005) appears to be negatively impacting on the successful implementation of the new reforms when teachers could not be easily identified as having a 'full role'. In these instances, it seems to be problematic for organisations to identify clear training routes for different categories of staff. Not surprisingly there is confusion over whether some teachers need to gain QTLS and therefore study DTLLS or ATLS and therefore study CTLLS.

The distinction between qualification and qualified status was explored. All of the organisations surveyed, including the two ACL organisations, required their 'full' teachers/lecturers to hold QTLS, of which DTLLS is a key requirement. One organisation required their assessors to hold QTLS, four required this of trainers and one required it of learning support staff. Where the implications of the requirements are still not yet clear are for those staff who do not fulfil the category of 'full teaching role'. For staff that fall outside of this definition for whatever reason, organisations were taking different approaches to the qualification required and thus qualified status. Many were seeing PTLLS as an appropriate award for some categories of staff such as support workers, learning technicians and advisors, even though this is seen as a 'stepping stone' qualification that provides a basic 'toolkit' for new teachers, not an end qualification in itself (2007a).

"However, this [whether support staff requires PTLLS] is a bit of an on-going issue. Are they instructors or technicians? If they are interfacing with students they should be doing PTLLS e.g. in Construction. Technicians are interfacing more with students than they used to". R1

Reflecting this, others raised concerns over the general confusion in the sector regarding the status of PTLLS:

"[I am] still confused that some people see PTLLS as an end in itself. One local college sees PTLLS as the appropriate qualification for sessional staff. [Our organisation] doesn't. Sessional staff are required to gain DTLLS". R2

With regard to ATLS status, three organisations required teachers/lecturers to gain this status, six required their assessors to gain ATLS, five required trainers to hold ATLS and two required ATLS of learning support. Five organisations did not require assessors to hold either QTLS or ATLS. Six organisations also required neither for learning support staff.

Given the complexity of this situation and the confusion about those teachers who were not categorised as having a 'full teaching role', this was further explored at interview. As expected, a wide range of responses was recorded for staff categorised as not in a 'full-role'; a range of decisions have been made.

In some organisations, particularly for those working in a support role, the requirements were that they achieved PTLLS, with typical responses being:

"Support staff working in Instructor role [are] required to have PTLLS". R1

"Some support workers e.g. the deaf worker, have chosen to do PTLLS but it isn't mandatory". R1

"Trainers and staff working on Train2Gain will take the PTLLS qualification". R3

Some were seen as being required to work towards ATLS and studying for a CTLLS:

"Prince's Trust Team Leaders working in eight centres and leading on projects. They also should be Associate Teachers". R4

However, many questioned the relevancy and benefits of ATLS and CTLLS qualifications:

"There aren't many people for whom CTLLS is appropriate". R2

"A small number of people who, for example, support the delivery of IT courses in the Go for IT drop-in centre are deemed to require CTLLS only". R2

Those in an assessor-only role were the focus of both clarity and confusion with suggestions that they should be qualified to CTLLS level and also not qualified to teach at all:

"They have three groups of assessors: one group teaches the underpinning knowledge, the others don't. All are treated as Associates and required to get PTLLS and CTLLS". R4

"Assessors are not required to qualify". R5

The specific categories of agency staff and assessors were explored as it was thought that these teachers may be facing even greater confusion about what is required. We also found through the questionnaire that for those surveyed, the teaching workforce consisted of 20% agency staff. For agency staff, the organisation is not the employing organisation, so where should the responsibility for checking and providing qualifications lie? Perhaps more importantly for this group of staff is the impact of both managerialism (Randle and Brady, 1997a; Randle and Brady, 1997b) and marketisation (Gleeson and Shain, 1999; Hey, 1996). Cultures of managerialism and marketisation have impacted negatively on conditions of service for FE teachers and have been explored by many writing about the impact of the intense policy activity that followed 'incorporation' (1992) that removed FE colleges from Local Education Authority (LEA) control. It could reasonably be argued that this and the concurrent changes to funding arrangements for the sector that ensured organisations were more efficient and cost-effective resulting in 'colleges [having] to expand while cutting unit costs' (DfES, 2002; p. 5), this enabling a reduction of funding for the sector (Fletcher and Owen, 2005; UCU, 2006) have impacted most heavily on agency teachers.

The following responses at interview support the views that the situation for agency teachers is indeed more complex, with organisations taking a range of approaches, from expectation that training will be the responsibility of other parties before arriving at the organisation:

"Agency staff need to be qualified before starting and it is assumed that this will be checked by the manager who recruits". R2

To support for ITE from the placement college:

"All agency staff are treated the same way and also put on the PTLLS/DTLLS course if not fully qualified. When I said that this was unusual, [name] said it was because they wanted to try and maintain standards". R3

To a withdrawal from offering support:

"Used to include agency staff but not now, however they do give a discount to agency staff". R7

Although it was never envisaged that there would be a progression route from CTLLS to DTLLS as each is a distinct qualification designed for different job roles, the relationship between the two levels of qualification is seen as deeply problematic by some in the sector; the lack of progression may become an issue in future if staff for whom CTLLS is deemed to be appropriate and who subsequently take on more responsibility in the classroom need to 'upgrade' their qualification to DTLLS. As it currently stands, the consensus from the study suggests that there is no mechanism for Accreditation of Prior Learning (APL) and respondents feared that teachers in these circumstances may have to take the full DTLLS qualification. A typical response was:

"CTLLS is a waste of time. It doesn't articulate with DTLLS. Anyone who has aspirations to be a qualified teacher in the future has to go back and do lumps of the course again. Demotivating and an incredibly incompetent piece of design". R2

Delivery patterns and collaboration

From the survey, most reported a range of training contexts for their staff. Ten of the eleven offered some level of ITE. Even though concerns had been raised in year one of the study regarding the impact of funding, this did not seem to have negatively impacted on delivery patterns. There was a mixed pattern of delivery across the organisations with some parts of the course being run in-house with students progressing to a HEI provider for the second part of the course. Some of the organisations were running the course totally in-house.

The historical nature of FE ITE is that it tends to be offered in a range of contexts with relatively few organisations offering the full award in-house. Many traditionally have forged links with other providers, including HE organisations. With the change in funding described earlier, it was thought that this may be changing. Organisations were asked what collaboration existed between and across institutions. One organisation stated that there had been a recent change that reduced collaboration:

"There used to be collaboration with three other colleges". R1

Some organisations who are large ITE providers, offer their courses to neighbouring organisations and there is informal collaboration occurring at local level:

"...[college] provides courses for a number of local colleges. Collaboration already in place". R2

"Sessional staff can use the college nearest to where they live". R4

"[HEI] is the hub for our qualifications. They provide training, standardisation and partnership meetings". R5

"We send staff to neighbouring colleges if we can't accommodate staff. Collaboration would be a good idea. Perception is that staff don't take courses seriously enough when they are run by in-house staff". R6

New collaborative networks are emerging and strengthening:

"Member of the L7 Group — Colleges in the Central London LSC. They meet on a regular basis. They have put together a performance management course and are looking at shared programmes, work shadowing, developing competencies, support for managers". R3

"Starting to do joint work through the L7 group (seven colleges in central London LSC)". R7

Dealing with pre-2001 and pre-2007 staff

For those teachers employed before 2007, two organisations stated that they would offer support to such teachers to gain the qualification and for nine this would be a contractual obligation on the part of the staff. For staff employed post-2007, ten organisations would enforce the requirement through contractual clauses but two of these would offer support. For those staff who are not required to gain QTLS or ATLS by the new legislative requirements, one organisation stated that staff would be encouraged through college policy and given further support through the appraisal system.

This is largely borne out by responses given at interview, but a richer picture emerges with some colleges genuinely offering support. Three approaches to those staff employed prior to 2001 and to 2007 were identified from the data. First a supportive approach in line with expansive approaches to organisation learning (Fuller and Unwin, 2003a; Fuller and Unwin, 2003b) could be identified:

"Pre-2001 staff were actively encouraged to gain qualifications before 2007. Some are never going to achieve the full qualification but they will probably have done the old City & Guilds 7307 and the Assessor awards and will be up to date vocationally". R1

"It has been a long, uphill battle getting assignments from post 2001 staff. Some 2001 - 2007 staff have still to finish their qualification. Some have taken a gap". R1

"Most pre-2007 staff have been moving forward but not pre-2001 staff. Some staff who have been trying to qualify for up to three years after the course has finished - issues with assignments and levels of literacy, particularly in vocational areas". R6

Secondly, a strongly managerialist approach (Gleeson and Shain, 1999; Randle and Brady, 1997a; Randle and Brady, 1997b) could be identified with organisations resorting to contractual clauses to 'encourage' staff to gain a teaching qualification:

"If you are employed by [stated] College, you will have a teaching qualification no matter how long in employment. This includes the pre-2001 people. Very small number of refuseniks. Policy in place since 2001". R2

"[College] insisting everyone is qualified. Raised with UCU [University and College Union]. Most people qualified anyway. Pre-2001 staff are doing the qualifications". R7

Third, a laissez-faire approach was taken by some organisations who pragmatically stated that with numbers not being particularly significant in their particular organisations, would not force the issue:

"Very little has happened with the pre-2001 staff. Almost everyone else is now qualified. About 20 staff not fully qualified. The College hasn't put pressure on them as most are nearing retirement. Even if staff are not fully qualified, they will have gained some form of teaching qualification such as C&G 7407". R3

"2001–2007 staff mainly qualified. Only two pre-2001 staff not qualified (and nearing retirement). (121 full-time and fractional staff; 54 sessional)". R3

"Only one person pre-2001 not qualified. The two-year rule applied for 2001 - 2007 staff". R5

Conclusion

The considerable policy change imposed on FE in recent years and the continued focus on the 'skills agenda' has culminated in a new professionalisation agenda that legislates for the initial education of new teachers and their Continuing Professional Development and has been largely welcomed by the sector. Within the context of these new requirements, there is a wide and varied response to what qualification and qualified status different categories of teachers are required to gain. For those teachers with a 'full teaching role', there was a clearly understood requirement to gain the full teaching qualification at a minimum of Level 5 and all the organisations surveyed required this of their staff. Where the implications of the requirements are not yet clear is for those staff who do not fulfil the category of 'full teaching role'. For the staff that fall outside of this definition for whatever reason, organisations are taking different approaches to the qualification required. Many organisations were seeing PTLLS as an appropriate qualification for some categories of staff such as support workers, learning technicians and advisors even though this should be seen as a 'stepping stone' to CTLLS and DTLLS. The relevance of CTLLS and ATLS status was not always identified or acknowledged. Most of the organisations reported a

range of ITE training contexts for their staff and new collaborative networks are emerging and strengthening. In regards to teachers first employed before September 2007, we found three different approaches taken: first a supportive approach in line with expansive approaches to organisation learning; second, a strongly managerialist approach could be identified; third, a laissez-faire approach was taken by some organisations who pragmatically stated that with numbers not being particularly significant in their particular organisations, would not force the issue. If the new professionalisation agenda is to be successful in raising the standard and profile of the sector and those that work within it, it would be helpful to further explore with a wider sample the confusions raised through this study. Additionally, further research with teachers who are experiencing the impact of the professionalisation agenda is recommended to gain greater understanding of whether those not in a full-time, full teaching role are disadvantaged in terms of access to professional development.

References

(1992) Further and Higher Education Act. England.

(2001) The Further Education Teachers' Qualifications Regulations. FENTO, England.

(2007a) The Further Education Teacher's Qualifications 2264. England.

(2007b) The Further Education Teachers' Continuing Professional Development And Registration Regulations, 2116. England.

Alaszewski, A. (2006) Using Diaries For Social Research. London: Sage publications Ltd.

Cohen, L., Manion, L., Morrison, K. (2007) Research Methods In Education. 6th ed. London: Routledge.

DfES (2002) Success For All: Reforming Further Education And Training. London: HMSO.

DfES (2004) Equipping Our Teachers For The Future. London: HMSO.

DfES (2005) Skills: Getting In Business, Getting On At Work. London: DfES.

DIUS (2007) World Class Skills: Implementing The Leitch Review Of Skills In England. London: HMSO.

Fletcher, M., Owen, G. (2005) The Funding Gap: Funding In Schools And Colleges For Full-Time Students Aged 16-18. London: LSDA.

Foddy, W. (1993) Constructing Questions For Interviews And Questionnaires: Theory And Practice In Social Research. Cambridge: Cambridge University Press.

Fuller, A., Unwin, L. (2003a) Expanding Learning In The Workplace: Making More Of Individual And Organisational Potential. Leicester: NIACE.

Fuller, A., Unwin, L. (2003b) Learning As Apprentices In The Contemporary UK Workplace: Creating And Managing Expansive And Restrictive Participation', Journal of Education and Work Vol. 16, No. 4, pp. 407-426. http://dx.doi.org/10.1080/1363908032000093012

Glaser, B. G., Strauss, A. (1967) The Discovery Of Grounded Theory: Strategies For Qualitative Research. Chicago: Aldine.

Gleeson, D., Davies, J., Wheeler, E. (2005) 'On The Making And Taking Of Professionalism In The Further Education Workplace', *British Journal of Sociology of Education* Vol. 26, No. 4, pp. 445-460. http://dx.doi.org/10.1080/01425690500199818

Gleeson, D., Shain, F. (1999) 'Managing Ambiguity: Between Markets And Managerialism-A Case Study Of Middle Managers In Further Education', *The Sociological Review* Vol. 47, No. 3, pp. 461-490. http://dx.doi.org/10.1111/1467-954X.00181

Hey, V. (1996) "A Game Of Two Halves": A Critique Of Some Complicities: Between Hegemonic And Counter-Hegemonic Discourses Concerning Marketisation And Education'. Discourse: Studies in the Cultural Politics of Education Vol. 17, No. 3, pp. 351-362. http://dx.doi.org/10.1080/0159630960170305

Leitch, S. (2006) Leitch Review Of Skills: Prosperity For All In The Global Economy - World Class Skills. London: HMSO.

LLUK (2006) New Overarching Professional Standards For Teachers, Tutors And Trainers In The Lifelong Learning Sector. London: Lifelong learning UK.

LLUK (2007) Developing Qualifications For Teachers, Tutors And Trainers In The Lifelong Learning Sector In England - Interim Information For Awarding Institutions. London: Lifelong Learning UK.

LLUK (2008) Further Education Workforce Data For England: An Analysis Of The Staff Individualised Record Data 2007-2008. London: LLUK.

Nasta, T. (2007) 'Translating National Standards Into Practice For The Initial Training Of Further Education (FE) Teachers In England', Research in Post-Compulsory Education Vol. 12, No. 1, pp. 1-17. http://dx.doi.org/10.1080/13596740601155223

Ofsted (2003) The Initial Training Of Further Education Teachers (HMI 1762). London: Ofsted.

Ofsted (2009) The Initial Training Of Further Education Teachers 2004-2008 (080243). London: Ofsted.

Randle, K., Brady, N. (1997a) 'Further Education And The New Managerialism'. *Journal of Further and Higher Education* Vol. 21, No. 2, pp. 229-239. http://dx.doi.org/10.1080/0309877970210208

Randle, K., Brady, N. (1997b) 'Managerialism And Professionalism In The Cinderella Service', Journal of Vocational Education and Training Vol. 49, No. 1, pp. 121-139. http://dx.doi.org/10.1080/13636829700200007

 $\label{thm:condition} \begin{tabular}{ll} UCU (2006) Further, Higher, Better: Submission\ To\ The\ Government's\ Second\ Comprehensive\ Spending\ Review.\ London:\ UCU. \end{tabular}$

Wooding, P. (2007) How Providers In London Are Responding To The Introduction Of QTLS And The Associated Statutory Requirements. London: LONCETT.