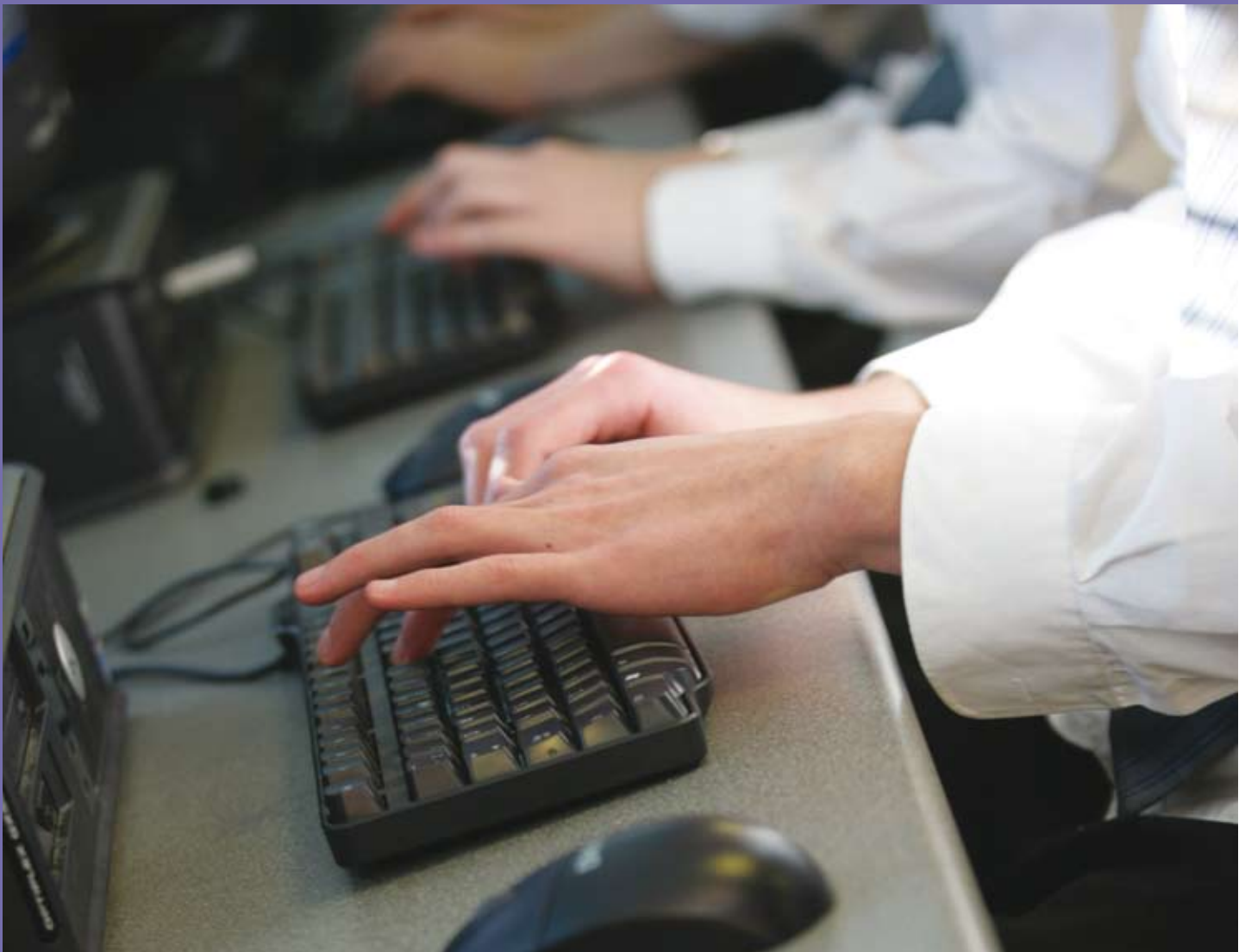




# SitW Thematic Report: Confusion in the Marketplace



## Research

Research document No: 019/2008  
Date of issue: January 2008

# SitW Thematic Report: Confusion in the Marketplace

<b>Audience</b>	Careers and business advice and guidance organisations, Colleges of Further Education, employers, training providers, and DCELLS programme delivery, funding and planning departments.
<b>Overview</b>	Skills in the Workplace is designed to “raise skill levels of employees and create an ethos of training within SMEs in North Wales”. This thematic report looks issues around confusion in the marketplace. It is in addition to the main report which addresses the current position, and the ‘distance travelled’ over the past 6 months or so’.
<b>Action required</b>	No action required.
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<b>Related documents</b>	Evaluation of Skills in the Workplace Stage 2 Report  SitW Thematic Report: The Adoption of Skills in the Workplace by Different Industrial Sectors

# Evaluation of Skills in the Workplace

## Thematic Report: Confusion in the Marketplace

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September 2007

## 1. Overview

### ***Thematic reports***

As a key part of the evaluation of the Skills in the Workplace (SitW) programme, 4 'thematic' reports address in detail a series of key issues for SitW and allied policies, programmes and project delivery arrangements.

This report addresses the 'Confusion in the Marketplace' theme, which emerged during the early stages of the evaluation as a matter of potential concern because of perceived overlaps in the support offered by a number of publicly funded training programmes in the area covered by SitW.

### ***'Competition' between different programmes***

In essence, there was little doubt that the predecessor programmes to SitW (Skills for Business – SfB and Skills for Employment – SfE) did have a definite 'niche' in that they provided 'bite-sized chunks' of learning to adults in work. This was a group traditionally not catered for by mainstream, publicly funded training programmes - typically on the grounds that employers ought to be carrying out this kind of skills development activity to improve their business performance anyway: training should take place because it delivers a straightforward commercial return.

By the time SitW became operational (June 2004) this distinctive position had become less clear-cut with, for example, the launch of all-age Modern Apprenticeships allowing people over 25 access to structured training and qualifications not previously available to them (or at least not in such a convenient format). It is even less clear-cut now, and a series of other programmes (e.g. 'Step-Up') may also provide reasonably flexible learning routes for people in work, with at least a proportion of inputs receiving public financial support.

### ***'Confusion'***

As a result, providers can, at least in principle, offer similar learning outcomes through somewhat different routes to improve the skill levels of people in work, and there may be issues over which route is the 'best' for learners and the organisations they work for in particular circumstances. Equally, employers and their staff may get to hear about different learning programmes which could seem very similar in what they offer.

Does this lead to ‘confusion’? Might, at worst, the existence of several similar programmes - each with its own rules, regulations and delivery arrangements - actually deter employers from supporting **any** training programme?

This report seeks to clarify the **extent** to which any confusion exists, particularly in the minds of employers, about opportunities for upskilling their employees, and the **implications** which arise (or could arise) from any confusion. It is structured, first, to review the main programmes which could lead to potential market confusion affecting SitW. The key approaches to marketing these ‘products’ are also reviewed – to identify the ‘messages’ delivered to employers and others, and assess possible overlaps in terms of marketing, underpinning assumptions and learning opportunities.

The report then looks at the processes through which employers may become engaged with SitW and comparable ‘products’ and reviews different stakeholders’ perspectives, in essence to review whether particular categories of stakeholders may actually experience ‘confusion’, and if so, what the consequences might be.

Finally, conclusions are drawn in relation to SitW, the wider DCELLS<sup>1</sup> portfolio of learning ‘products’ and a number of future options.

## 2. Evaluation of Skills in the Workplace

### *Links to the main evaluation*

This thematic report needs to be set in the context of the evaluation of Skills in the Workplace as a whole. The overall aims for the evaluation centre on addressing almost 30 varied questions, which include:

- (v) *To what extent is the Skills in the Workplace initiative still relevant and appropriate in light of changing policy foci and programme developments?*
- (xxvii) *What impact is ‘competition’ from WBL<sup>2</sup> and other DELLS<sup>3</sup> ‘products’ having on Skills in the Workplace?*
- (xxviii) *Is there ‘confusion in the marketplace’ in the minds of employers commissioning training? If so, how might this best be resolved (e.g. through HRD<sup>4</sup> advisers acting in an ‘honest broker’ role)?*
- (xxix) *Bearing in mind not only Skills in the Workplace, but ‘competitor’ products and also commercial options, what would be the best way of meeting employers’ needs and expectations for improving skills in the workplace: in particular, what might appropriately be provided commercially; what needs*

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<sup>1</sup> Department for Children, Education, Lifelong Learning and Skills – formerly DELLS, Department for Education, Lifelong Learning and Skills

<sup>2</sup> Work Based Learning

<sup>3</sup> Department for Education, Lifelong Learning and Skills – see above

<sup>4</sup> Human Resource Development

*can be foreseen for flexible, 'bite-sized chunks of learning' in the medium-term?*

### **Sources of information**

So a number of aspects of the main evaluation overlap with the subject areas at the heart of this thematic report, but addressing actual or potential 'confusion' appropriately has required additional, more focused research. Accordingly, this report is based on:

- Revisiting data collected as part of the Phase I data collection exercise for the main SitW evaluation
- Follow-up interviews with employers, providers and others, mainly linked to the Phase 2 data collection exercise for the main SitW evaluation
- Additional data collection: interviews with further DCELLS staff (notably those associated with marketing, managing HRD advisers, programme management) SSC staff etc.
- Desk research in areas including clarification of precise eligibilities and operational characteristics of the various programmes; evidence of marketing and 'product differentiation' adopted in Wales and other parts of the UK.

### **3. Alternative Routes to Skills Development**

Looked at overall, there are opportunities for up-skilling people in work within North Wales through a wide variety of channels including at least the following:

- commercial training providers
- SSCs direct
- professional/ trade bodies
- fee-paying college courses
- e-learning, distance learning
- specialist EU-funded programmes (large quantities of EU funding support SitW and other DCELLS training programmes, but funds also go to smaller-scale programmes (e.g. 'ICT training', 'e-business learning', 'training for business in Europe', 'training to care'<sup>5</sup>).

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<sup>5</sup> These examples all taken from past projects delivered by Yale College with ESF support.

The prime candidates for 'confusion' in the case of SitW come from other DCELLS programmes, however. Most important amongst these are<sup>6</sup>:

**Modern Apprenticeships (MAs)** – previously restricted to people under 25, now an all-age programme – provides training in the work place and from a local college or training provider. Each modern apprenticeship framework includes the following:

- A National Vocational Qualification (NVQ) Level 3
- Key skills appropriate to the sector
- A technical certificate relating to the NVQ.

**Foundation Modern Apprenticeships (FMAs)** lead to NVQ Level 2 and are often used as a stepping stone to a Modern Apprenticeship. They offer young people an opportunity to gain the skills and qualifications needed for a successful career. FMA frameworks are available in approximately 80 occupational sectors. Each framework includes the following:

- A National Vocational Qualification (NVQ) Level 2
- Key Skills appropriate to the sector
- A technical certificate (where the sector has identified the need).

### **Modern Skills Diploma**

Designed for managers, technicians and others in positions of responsibility within SMEs who have the ability to train to NVQ Level 4.

### **Skill Build and Skill Build+**

Aimed at learners who lack confidence, have poor basic skills and need encouragement to improve their skills.

**Step-Up:** Sector-specific programmes to improve industry-specific skills and qualifications (e.g. promoting ITQs for IT Users); also the project targeting local adults in full time employment in Ceredigion and South Gwynedd, providing the chance to get education and training up to NVQ Level 3, or simply to get a taste for learning - part of the Ireland/Wales Step Up Programme a joint initiative between the Welsh Assembly Government and Foras Aiseanna Saothair, the training and employment authority in Ireland, targeting people who work in SMEs in particular.

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<sup>6</sup> Data here comes primarily from [www.skillspeople.success.com](http://www.skillspeople.success.com)

**ReACT:** Help for employers wishing to recruit and retain people who have been made redundant.

It might be argued that there is no precise duplication of the SitW 'offer' – with its potential for supporting small-scale inputs which are not expected to lead to NVQ accreditation, for example. Several other programmes (notably Step-Up, MSD) retain sectoral, age or geographic restrictions. However there is little doubt that it trends towards more flexible 'bite-sized' support, reducing restrictions on entitlement (e.g. the MA age range) and the general broadening of opportunities for accessing support have all impinged on SitW's previously distinctive characteristics.

#### **4. Employers – Pre-Engagement**

Employers may describe a degree of confusion **after** they have agreed to take part in a particular programme, and this can be important when they are considering further skills development actions in particular. Confusion is inherently more likely to emerge when employers are first considering a programme like SitW ('pre-engagement') and then making a specific choice about taking part in a particular programme ('engagement').

Pre-engagement processes may well be complex, involving a mix of formal marketing, word-of-mouth referrals and various preconceptions on the employer's part. Our employer survey suggested that most employers taking part in SitW tended **not** to have been particularly proactive in seeking out appropriate skills development opportunities, with direct approaches from providers being particularly significant for raising interest and starting processes which eventually lead to training taking place.

Nevertheless a wide variety of 'ways into SitW' are available – which may, or may not, tend to dispel concerns about potential 'confusion'. Three main routes can be identified.

##### ***Skills.People.Success***

The primary route employers are encouraged to follow for gaining basic information about any workplace learning (or any other publicly-funded skills development opportunities) is via the Skills.People.Success website ([skillspeoplesuccess.com](http://skillspeoplesuccess.com)) or telephone 'helpline' (0845 60 661 60).

If this initial contact requires basic information only (e.g. information packs, provider contact details) this will be provided direct. Where more in-depth responses are required, the caller will be offered a contact with an HRD



adviser – an independent expert selected, trained and briefed by DCELLS to assess employers' needs and offer the solution most relevant to those needs – including SitW and the other programmes listed earlier.

Earlier evaluation work suggested that – in the past – this route has not been followed to any great extent by employers likely to take up SitW. Indeed, as part of the 'Phase 1' data collection programme for the SitW evaluation it became abundantly clear that HRD advisers' appreciation of SitW was low, and contact between SitW providers and HRD advisers was, in practice, minimal (although efforts have been made to improve matters subsequently).

It is thought that a similar picture has also existed in relation to Modern Apprenticeships, Step-Up and other workforce development programmes – at least until recently – but it can readily be argued that the HRD Adviser role is a demanding one, and in terms of targeting, their priorities have traditionally been to address rather wider issues, particularly through encouraging employers to consider (and ideally commit to) Investors in People.

### ***Promoting Specific Programmes***

Our interview programme suggested that, in practice, Skills.People.Success has not been particularly significant for the success, or otherwise, of SitW. Contacts from SitW Network members have provided the most important means of raising SitW awareness. Colleges and other providers have accepted the need to 'sell' SitW heavily themselves – either to employers with whom they are already in contact, or via direct approaches to firms they believe may be able to benefit from what SitW can offer.

In doing this they have sometimes carried out integrated marketing initiatives with DCELLS support (e.g. in targeting hotels and other catering establishments as employment built up for the summer season). In most cases, however, recruiting 'new' employers onto SitW has been achieved by providers' representatives making contact with specific businesses, then advising them of the opportunities and benefits the programme can offer.

Comparable approaches in practice seem to be adopted in relation to Step-up, Modern Apprenticeships and a number of other programmes. Strengths are clearly the capacity for drawing on existing links and a provider's local reputation. Levels of activity do depend on provider motivation, however, which in turn is likely to be influenced by factors like the programmes which providers can already conveniently offer, and the financial returns they can achieve from offering one programme rather than another.

## ***Referrals***

In theory, referrals between SitW members could broaden choice appreciably by extending choice and areas of expertise. As we have seen in the main study, however, levels of referrals between providers are not usually high, and what a specific provider can supply (or wishes to supply) remains a crucial factor in determining what support is made available.

In some cases (the ITQ pilots for e-skills UK for example) these arrangements may lead to low numbers of beneficiaries only. More widely, some subject areas may not be offered at all: we simply do not know the extent of potential interest in, for example, specialist SitW courses for the finance sector or other sectors where North Wales is not particularly well represented, but **some** demand could well be envisaged.

Referrals from other sources (SSCs, HRD Advisers) are constrained by lack of knowledge of SitW on the part of these individuals, following points made already. As far as we can tell, referrals from one employer to another, or from employees to employers, are mainly of the form “*why don’t you talk to X*” which **might** infer potential confusion in the minds of those making referrals, but may well simply indicate what is seen as the most practical way forward.

## **5. Employers - Engagement**

### ***‘Signing-up’ with specific providers***

In principle, whether initial contact is made by HRD advisers, providers’ ‘sales people’, or through some other route, it is likely that - from an early stage - discussions will take place with a single provider, mainly centred on a specific solution - maybe based on SitW, maybe not.

Where an HRD Adviser is involved, a much fuller diagnostic exercise will be carried out, but the provider’s representative too will need to know about the main characteristics of the employer’s business, why skills development is of interest, and the sorts of outcomes being sought.

With these factors suitably established, there will normally be little explanation of the full range of possible ‘products’ and discussion will centre on a very small range of opportunities - maybe just one. As a result, employers are, in this sense, unlikely to be ‘confused’ - or even aware of possible overlap, duplication, and alternatives.

In a minority of cases, employers may have wider information about programmes - perhaps from previous experience, word-of-mouth referrals,

reading about opportunities or whatever. This does not necessarily tend to broaden discussions, however: advisers and providers' staff should normally be able to react to these suggestions quickly – either to talk about following the route suggested by the employer, or point out why another option might be more appropriate. These discussions too are unlikely to cover every possible 'product in the marketplace'.

As a result, data from employers involved with SitW suggest there is, in practice, no great confusion over what the best training route for them might be. With little or no appreciation of the full range of products which they **could** access, most rely on providers (occasionally intermediaries like HRD advisers) to 'do their homework for them' and recommend specific learning actions.

### ***'Market' appreciation***

It is true to say that if employers are asked about the relative merits of, say, MAs, Step-Up and SitW, the position on 'confusion' is rather different. To start with, the 'branding' of these programmes is typically poorly recognised by employers – particularly so in comparison with typical awareness of major local training providers.

Providers (notably colleges) are, inevitably, well recognised within their localities, even if their reputations with different employers vary. So we were much more likely to hear that *"I get people trained at ..."* than *"We have people on Modern Apprenticeships, Skills in the Workplace"* or whatever.

When discussions turned to eligibility, costs and benefits associated with different programmes then misunderstandings, lack of information and misperceptions were widespread, sometimes compounded by dim recollections of past programmes and stereotypes: *"is it like YTS?" "I don't suppose we qualify for most of it – we don't manufacture anything here"*.

Yet in most respects this lack of understanding did not cause specific concerns for employers: if relationships are satisfactory with a particular intermediary or specific provider, employers involved with SitW tended to be content with what they were receiving, they tended to assume that the 'broking' and 'matching' processes had been treated appropriately - leaving little perceived need for them to check out more detailed aspects of possible programme duplication, good/ less good reputations, better alternatives, etc.

## 6. Non-involved Employers

We have very little direct evidence in this study about the views of employers **not** currently taking part in any work based, publicly funded training.

Other research paints a very varied picture, pointing out what are often low levels of knowledge about opportunities (*“There was a lack of awareness about the types of training provision available, which some companies felt was partly a feature of running a small business; they were so busy running the business, they don’t have time to look into provision<sup>7</sup>.”*)

We gained further indirect information from key informants and providers about employers who *“don’t believe in training – they think people will just leave;” “don’t understand what’s involved, don’t really know how to go about it”;* or *“struggle to meet the costs – they’re very hard up at the moment”*. It was indeed accepted that, in the view of one SSC representative, *“the current set-up doesn’t help – I couldn’t really say I understand what’s out there and how to access it – what chance does a small business person have of picking their way through all the leaflets (often out-of-date), people trying to sell you their ‘product’ only... talking a language you don’t understand ...”*.

A number of employers were involved with other programmes but not SitW – and vice versa. This seems mainly to arise from ‘single contact, single solution’ approaches. Thus if for example, an employer uses MAs for meeting longer term skill needs, there is no guarantee at all that short-term ‘fixes’ for existing employers via SitW will be offered nor, with very low employer awareness of ‘what’s out there,’ will these employers tend to ask appropriate questions of providers themselves.

Drawing on this material, therefore, it does seem highly likely that ‘non-involved’ employers will be the group most likely to experience significant confusion over publicly-funded Workforce Development programmes – and for this confusion to play a definite part in inhibiting the take-up of programmes like SitW. Lack of knowledge, misperceptions about inherently complex topics, and even scepticism about basic concepts can all be inferred. The challenge in drawing more definite conclusions for this thematic report – and the SitW evaluation overall - is simply our limited information about these non-involved employers.

One of the expectations for SitW as a programme is that it will ‘chip away’ at negative employer attitudes to training. In the Phase 2 data collection

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<sup>7</sup> ‘Attitudes to Learning’ Main report: Elwa 2004

exercise for the main evaluation, we found some evidence of this happening – often through the providers appointing dedicated marketing or liaison staff able to approach companies direct and, in effect, “*sort out all the details for them*” as and when ‘reluctant’ employers were ready to consider becoming engaged with programmes.

At pre-engagement stage with currently non-involved employers, it does seem that this work may sometimes require attention to aspects of possible ‘confusion’ over the availability and provision of programmes. It has to be said that non-involved employers will almost certainly have failed to respond to many in the past, so the pattern of ‘chipping away’ – perhaps through a series of direct approaches from providers – seems inescapable.

## **7. Providers and Key Informants**

### ***Overall Picture***

Privately, DCELLS staff and providers tended to agree that “*there is a lot of overlap between schemes: hardly anybody (maybe nobody!) knows all there is to know about every scheme out there that might be relevant. And despite what’s said about tailoring to employer need, it’s pretty heavily supplier dominated*”.

For one interviewee, “*it all cries out for a simpler, clearer ‘offer’ to help train people actually working... but I suppose we’ve said that for years ....*”

We spoke to 8 staff from SSCs about SitW and possible confusion in the market place. Their own levels of clarity about SitW and other programmes were not, overall, particularly good: for at least one, “*it’s all a bit of a dog’s breakfast – I’ve given up trying to be an expert in what’s possible; it all needs a sort-out*”; “*even in South Wales, without SitW, it’s confused. SitW just adds another wrinkle!*”

The work of provider representatives, SSC Staff, HRD Advisers and others who “*try to make sure employers get straight to what’s best for them*” was acknowledged – although “*it isn’t as easy as you might think*”.

Points about the very limited contact between the SitW network and HRD Advisers (until recently) have been made already so one route through which employers might be guided “*objectively*” through various options is accepted as being “*a bit hypothetical – and even if Advisers do get in touch, you could question how much they really know about SitW – and don’t forget the pressures they are under to deliver against liP targets ...*”.

Commercial issues cannot be ignored either: *“HRD Advisers don’t get much from an MA referral or SitW – it can’t be top of their lists”; “Colleges are independent organisations now – people are quick enough to criticise them when they lose money; you can’t expect them to ignore the fine detail of what’s on offer from the Assembly and make their own decisions about which programmes to push, what’s not quite so attractive. And when you start with a confused picture anyway, it can all become a bit of a black hole.”*

So concerns remain that *“despite the official position of almost anything goes with SitW, employers can have what they want, it’s not that simple: it’s very doubtful if anyone can really tell you about absolutely everything to do with staff training. In practice, a lot is mainly supplier-led, still”*.

### ***Provider Decision-making***

Providers can realistically respond that they have to have an eye towards the expertise they can actually offer, as well as capacity and financial considerations. *“There’s no point in us saying we can do everything for just one employer. If the demand is big enough we can probably find a way ... but in the normal course of things, if we haven’t got a tutor with the right skills, and there isn’t the right kit and materials already, it’s difficult to justify spending too much time on some of these one-offs ...”*.

Detailed programme design and contractual arrangements can play an important part too. SitW’s match-fund requirements, for example, mean that longer courses with more senior people bring much higher incomes than shorter courses with unskilled individuals. Equally, towards the end of one contracting period (in early 2007, for example) providers may simply have exhausted their allocated places for one programme, and offer another either because it is the only one with available places, or to generate a ‘holding’ solution – which may be changed if additional places become available places, on other programmes.

On a positive note, in practice none of this need add to confusion for employers: they get only a restricted range of solutions to consider in the first place, which may well be further limited when ‘engagement’ discussions start with a provider. This does not, of course, guarantee that the employer gains the ‘best’ support an absolutely free choice from all possible workforce development opportunities might have offered.

## 8 'Joining-up'

Recent developments to build better links between providers and SSCs on the one hand and HRD Advisers on the other may improve matters. But this is not certain: for one SSC, *“(my sector) was allocated an HRD Adviser a couple of months ago. All attempts to get a meeting have failed. I can’t say it fills me with confidence. When I’m talking to employers I don’t know enough about SitW to sell it. It probably means people only hear about it accidentally”*.

So again, we have a picture dominated by key peoples’ limited appreciation of available programmes. There can also be expectations that details surrounding workforce development programmes will be *“complex, confusing, maybe impenetrable”* – a view expressed by one key informant, but summing up points made by others.

All of this points clearly to a **confused** marketplace. But this may not be the same as **confusion in the marketplace** *per se*.

The practical messages conveyed to employers by providers (and through periodic SitW marketing) do not reflect the full complexity of what is on offer (maybe inappropriately so on occasion) but this means that employers are much less likely to be ‘confused’ as a result.

Most employers not currently involved with SitW know little about it, or the other programmes they **could** access. In practice, any form of work based learning is far from the top of their list of priorities. The full range of options would be complex and confusing were they to research it, but they rely on providers in particular to identify a simple solution.

Employers who **are** involved in Work Based Learning know something about specific programmes – but again avoid the fuller range of options in the ‘confused marketplace,’ typically under the guidance of providers.

It is known that consideration is being given to integrating support for training and development with wider SME business support programmes in Wales, probably through Account Managers acting as guides towards the most appropriate solutions.

Clearly it is too early to say anything about options here, but in principle two issues are worth noting: first, at least potentially, a more integrated approach could prompt the *“clearer, simpler offer”* which would be widely welcomed. However, we must also accept that Account Managers or other ‘brokers’ would have a portfolio of options wider again than those available to HRD Advisers at present, so even more challenging to comprehend and prioritise:

there is no guarantee, therefore, that workforce development would attract a particularly high priority under these arrangements either.

## 9. Conclusions and Recommendations

We can sum up our conclusions about ‘confusion in the market place’ for work force development programmes like SitW as:

- **A Confused Marketplace:** Objectively, most key informants could either point to specific areas where there seemed to be duplications of services, or at least to a generalised perception that *“there’s a lot of confusion out there.”*
- **Engaged Employers Aren’t (usually) Confused:** There seems to be little or no confusion in the minds of employers who do become involved with SitW; their primary relationships are with specific providers; they do not seek out information about programmes they are not involved with, so avoiding having to make judgements about alternatives, detailed eligibility, appropriateness, etc.
- **Confusion Probably has Greatest Impact at Pre-engagement Stage:** Non-involved employers are the area of greatest concern. Many will have not responded to a range of previous approaches, perhaps for reasons including negative views about a congested and confusing marketplace. These views may well inhibit their engagement in programmes like SitW, but this study did not gather the primary data needed to be able to draw definite conclusions.
- **Providers (Understandably) Have Their Own Priorities:** Providers make it their business to understand the details of different programmes in depth (particularly the financial elements). Whilst this may support processes to simplify the ‘offer’ to local employers, there are important implications if providers find some training routes unattractive on commercial grounds: irrespective of particular programmes’ merits, they may well not even be discussed with potential clients.
- **SSCs, HRD Advisers and other Intermediaries Could Probably Take up a Stronger Supporting Role**, but are typically characterised by:
  - SSCs’ focus on specific needs within their sector, not wider workforce development
  - at least until recently, little appreciation (for most) about what SitW offered
  - until recently (for most, CITB being an important exception) SSCs having little or no contact with HRD Advisers, little appreciation of the part they could play in providing support to employers in their sector



- Several other priorities – probably seen as justifying more attention than SitW and other workforce development programmes
- Some wider concerns about HRD Advisers' levels of engagement with SMEs.

***Recommendations:***

Recommendations have to take account of the limited lifespan of SitW (at least in its current state) and a number of other programmes. Equally, if major changes are coming to the whole business support structures across Wales, a major re-think of how workforce development programmes are designed, promoted and delivered will be essential anyway.

At best, therefore, we can offer only suggestions for principles which might be adopted for any follow-on programmes after SitW ceases. These include:

- Developing genuinely integrated workforce development support, with unified labelling and branding, to minimise inherent confusion.
- Giving particular attention to promoting the unified 'brand' and 'offer' in the minds of non-involved employers; stressing its simplicity and lack of confusion.
- Actively maintaining support for employers currently involved with SitW to ensure momentum is not lost and confusion not reintroduced.
- Working with providers closely so that the overall 'message' to employers and individuals is clear and consistent.
- Allowing for reasonable competition between providers so that the 'offer' is not unduly simplified and concerns about provision being too 'supplier-led' are kept to a reasonable level.