# Response ID ANON-YNUV-7133-Z

Submitted to Education Reform: A Consultation on the provisions of the Education Bill Submitted on 2023-12-18 11:37:55

# High-quality qualifications

Question 1 What changes should we consider in terms of how qualifications are developed and delivered that you think would improve outcomes for Scotland's pupils and students?

## Please give us your views.:

As noted in the Muir report and other work which has informed the proposed new legislation, the Scottish Education system, qualifications and learner pathways and the breadth and interconnectedness of roles and functions carried out by multiple agencies including Education Scotland and SQA are complex. This is true both for learners navigating the system and for learning providers, and in particular for smaller community-based organisations providing qualifications and accreditation opportunities. We welcome the aim to establish clarity on roles and responsibilities of different agencies.

We welcome the aim that there should be a wide range of qualifications of different types and levels to suit diverse interests and aspirations. We believe that central to the development and delivery of qualifications should be a commitment that this be done in a way which addresses the attainment gap for learners of all ages. There is a clear commitment in the legislation to involve practitioners and learners to ensure that qualifications meet their needs. We would suggest that mechanisms to ensure inclusion of those learners or potential learners facing the greatest inequalities or barriers to participation should be put in place to ensure that their needs are met.

For adult learners this should include a commitment to developing qualifications that are flexible, accessible, relevant and build in accreditation for prior learning and informal learning. There should be clear progression pathways from informal into formal learning and consideration should be given as qualifications are being developed as to how they could be delivered to best reduce potential barriers for learners experiencing inequalities. Consideration should be given to the costs of accessing qualifications for all learners and building in flexibility of delivery, in particular ensuring opportunities for workplace based learning routes.

Developing learning and skills to meet national and workforce standards and recognise achievements of those looking to progress within their own learning, training or employment opportunities are rightly identified as key to informing the development and delivery of qualifications.

We would like to highlight the importance of learning, skills and qualifications in enabling and empowering individuals and communities to identify their own learning, skills and strengths to participate in their community and wider democratic processes and contribute to the wider participatory democracy, place and wellbeing and community empowerment policy agendas. Wider achievement programmes such as Health Issues in the Community, Adult Achievement Awards and Youth Achievement Awards already provide valuable opportunities for young people and adults to come together, gain recognition for their skills and achievements and participate in community action on issues which are important to them. This engages them both in learning and community action, leading to increased community participation, new community groups or activity and progression opportunities for individual participants to positive destinations.

A recent practice example is the development of the Community Health Advisory Forum in Dundee, whose members are all adult learners who have progressed on from successful completion of Health Issues in the Community courses and other community based adult learning to establish this forum. The aim is to ensure that communities are effectively and meaningfully engaged and involved in Dundee Health & Social Care Partnership decision making processes and improve the collective health and wellbeing of their communities.

We would welcome a new national body to provide support to develop accessible and easy to navigate pathways for learners to progress from these wider achievement awards onto further qualifications.

Increasing learning activity which supports democratic involvement and community empowerment so adult learners can access and create opportunities that meet their needs is a key commitment in the Adult Learning Strategy and we would encourage the new body to work with the Adult Learning Strategic Forum or other relevant body to develop a co-ordinated approach to the development and delivery of qualifications which support these ambitions.

# Excellence in learning and teaching

QUESTION 2 How best can we ensure that the views of our teaching professionals are taken into account appropriately within the new qualifications body, and do these proposals enable this?

## Please give us your views.:

If one of the mechanisms to ensure the views of teaching professionals are taken into account is to ensure that at least one teacher and one lecturer are on the Board of the new qualifications agency it should be recognised that a wide range of qualifications are undertaken outwith schools or further education colleges and delivered by a range of workers with a variety of professional backgrounds within the wider learning landscape. Therefore other learning professionals such as CLD Workers or workplace educators should also be included. It is not clear on the role of these Board members and how they would be selected and we would require further information before being able to comment on the effectiveness of this approach to ensuring that the views of teaching professionals are taken into account.

Our ability to comment on the effectiveness of the proposed committee would require more information on the membership of the committee and what

professions/roles are covered by the term 'teaching professionals.' We would suggest that this must be as broad a definition as possible to ensure that the breadth of professionals engaged in delivering lifelong learning, informal and workplace based learning be included as these are the settings that are more likely to engage learners in working towards accreditation and qualifications who are experiencing poverty, inequalities and additional barriers to learning.

Our ability to comment fully on the effectiveness of the proposed charter again would require more information on the definition of teaching professions.

#### Involving Scotland's pupils and students in decisions that affect them

QUESTION 3 How best can we ensure that the views of pupils, students and other learners are appropriately represented within the new qualifications body, and do these proposals enable this?

#### Please give us your views.:

We welcome the proposals to increase accountability of the new qualifications to pupils, students and other learners.

We would not be able to comment on the effectiveness of the proposal to have Board members reflecting 'lived experience' of those studying for qualifications and assessment by the body without further details on how the Board would propose to do this. How these members were identified, supported and how their experience would be recognised, acted upon and fed back to them are key areas we would require further information. Consideration needs to be made as to how people are supported to take part effectively. Potential approaches to supporting people include utilising the voluntary and community sector who are often trusted and able to deliver appropriately sensitive support. Another approach is peer support and, again, the voluntary and community sector has a role in facilitating this.

It is equally important to consider how to support board members from the public sector to be able to work collaboratively with community members and people with lived experience. This includes training in equality and the requirements of different groups, co-production and community engagement.

Again, in relation to the Committee we would suggest it is vitally important that provisions are made to ensure that learners working towards qualifications through informal learning, community based learning and workplace based learning and studying be represented. This is particularly important as these are the settings more likely to engage learners experiencing poverty, inequalities and additional barriers to learning. The Adult Learning Strategy recommended the establishment of an adult learners' advisory group and we would recommend that links should be made with this body or equivalent as a mechanism to reach and involve learners involved in working towards qualifications in as broad a range of settings as possible.

#### High standards for qualifications in Scotland

QUESTION 4 How can we ensure qualifications being offered in Scotland are reliable, of a high standard and fit for purpose?

#### Please give us your views.:

It is imperative, whatever final structures are put in place, that robust safeguards are put in place to ensure the effective separation of the accreditation and awarding functions of the new body. Processes for accrediting qualifications should be robust, independent and transparent both to learners and providers of accredited awards and qualifications. The contribution of learners and those with lived experience will ensure this further, particularly in relation to making sure qualifications are fit for purpose.

#### Qualifications in the education and skills landscape: A holistic system

QUESTION 5 How do you think the qualifications body can best work with others across the education and skills system to deliver better outcomes for all?

Please give us your views.:

The national forum for providing independent and objective views should be built on to ensure that the views of providers of community and workplace based learning and qualifications are effectively represented and inform the delivery of better outcomes to close the attainment gap for learners of all ages.

We agree that roles and responsibilities of national bodies are clear and well understood throughout the sector. Many learners of all ages participate in meaningful learning in community settings supported by smaller community and third sector agencies. In some instances, they can receive accreditation or qualifications through this route but to currently register as an SQA Centre or to deliver SCQF credit rated awards is time and resource intensive and so many organisations providing these learning opportunities do not have the capacity or resource to offer valuable qualifications. In some cases, local colleges, councils and larger third sector organisations initiate partnerships or consortiums to support these organisations provide accreditation or qualifications through their SQA Centre or equivalent. There is an opportunity for this new national body to pro-actively initiate and support such partnerships to enable a wider range of organisations to provide flexible and accessible qualifications and SCQF credit rated awards which would contribute to closing the attainment gap for learners of all ages and ensure that learners do not miss out on these valuable opportunities.

We agree that all activities of the new qualifications body should be fair, transparent and provide equitable access for all.

### Purposes of inspection

QUESTION 6 Do you agree or disagree with the purposes set out? Is there anything in addition you would like to see included?

#### Agree

Is there anything in addition you would like to see included?:

As inspection covers Community Learning & Development we believe that the purposes of inspection, in addition to education policy and provision, should reflect public accountability and assurance on the quality of community capacity building and its contribution to the wider community empowerment agenda across Scottish Government as set out in Audit Scotland's Principles for Community Empowerment. This should include accountability and assurance to community activists and groups engaged in community development and capacity building activity and to support those local authorities and public bodies involved in community development and capacity building by sharing effective practice and evidence about education and training to support services to improve and inform the development of community empowerment and regeneration policies.

### Range of establishments and services

QUESTION 7 Do you agree or disagree with the range of establishments to be inspected by HM Inspectors of Education? Is there anything you would change?

Agree

Is there anything you would change?:

We agree with the range of establishments to be inspected by HM Inspectors of Education. The current wording references 'Community Learning & Development Services.' We recommend amending this wording to 'Community Learning & Development functions of local authorities' to reflect the fact that in many areas there may not be a discrete CLD Service or if there is it does not deliver all aspects of the CLD functions. For example, community capacity building services may be delivered by a Chief Executive's Services Department, Youth Work within education services and adult learning services by an employability team.

QUESTION 8 Do you have any specific comments on the role of the inspectorate of education in the inspection of publicly funded colleges, initial teacher education, early learning and childcare and / or modern apprenticeships?

Please give us your views.:

No

#### Maximising the impact of education inspection

QUESTION 9 Do you agree or disagree with the priorities set out? Is there anything in addition that you would like to see inspection cover?

Agree

Is there anything in addition that you would like to see inspection cover?:

We recommend that the wording of the priorities set out to expand the range of stakeholders to be involved and considered be expanded to include community groups and organisations. This reflects the fact that they are key recipients of community development services and therefore are key stakeholders in the inspection of CLD functions of the local authority.

#### Addressing the priority issues

QUESTION 10 Do you have a view on these options for establishing the new approach to inspection?

Please give us your views.:

Option 2- establishment of a new role of Chief Inspector of Education for Scotland as an independent office holder.

QUESTION 11 Do you have a view on how governance arrangements for the inspectorate could be developed to better involve providers, including teachers and other practitioners, pupils and students and parents / carers in inspection?

Please give us your views.:

Whichever option is chosen to establishing a new approach to inspection the governance arrangements should be developed to ensure a diversity of views, in particular from groups facing inequality. One way to do this is to ensure mechanisms for involve or include the view of these providers and stakeholders at Board Level.

QUESTION 12 Do you have a view on how we make sure evidence from inspections is being used as fully as possible to drive improvement and inform policy and on who the inspectorate should report to?

#### Please give us your views.:

In whatever way evidence is published systems should be in place to effectively share with the relevant agencies and bodies and that this learning is translated into effective fieldwork support for CLD practitioners as well as other teaching professionals.

The proposals to enhance sharing of evidence on what works well in Sottish Education should include CLD functions, in particular what is working well in Community Development and community capacity building to support improvement. This evidence should be shared with Scottish Government, in particular the relevant Ministers responsible for community empowerment and regeneration etc. In addition to those responsible for education and lifelong learning.

#### About you

What is your name?

Name: Sarah Boath

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation: Scottish Community Development Centre

Further information about your organisation's response

Please add any additional context:

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

What is your email address?

Email: sarah.boath@scdc.org.uk

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

## Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?: Neither satisfied nor dissatisfied

Please enter comments here .:

There was a very short timescale to respond to this consultation.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?: Slightly satisfied

Please enter comments here .: