

Education, Children and Young People Committee, Call for Views – Education (Scotland) Bill – Colleges Scotland Response – August 2024

Introduction

Colleges Scotland is the collective voice for the college sector in Scotland, representing its interests and ensuring that colleges are at the heart of a world class education sector that is recognised, valued and available to all. As the membership body, Colleges Scotland represents all 24 colleges, which deliver both further education and 13% of the provision of all higher education in Scotland.

Colleges Scotland has had extensive engagement with the Scottish Government on the Education Reform Agenda to date. In December 2023 we provided the sector's position regarding the Education Bill consultation, offering views on what a new qualifications body and approaches to inspection could look like to support learners, communities, employers, and the Scottish economy. (Please see Annex 1.)

We welcome the opportunity to provide further sectoral views on the Education (Scotland) Bill for the Education, Children and Young People Committee.

Key Points

The sector broadly supports the functions outlined within the Education (Scotland) Bill and recognises that these are consistent with the current functions of SQA.

With the creation of this new qualifications body there needs to be a new perspective on parity of esteem for vocational subjects. Doing this will strengthen Scotland's tertiary offer, incorporating a focus on qualifications that reinforce institutional diversity, curriculum specialisms and industry partnerships. A key national driver should be the opportunity to augment, raise the profile, and in time transform the position of vocational and technical qualifications in Scotland.

The new qualifications body should work in a way that interacts more effectively with those who direct the learning and teaching within colleges. This can most effectively be done by using an interdisciplinary approach, with a culture of openness, and be willing to meaningfully engage and listen to stakeholder views including those of the college sector. It should be agile and responsive to changing societal and industry needs as per colleges within their regions.

A responsive qualifications body can be flexible to the needs of Scotland's businesses. This is done through supporting increased productivity – agile qualifications would help to boost reskilling and upskilling for those seeking to retrain, creating a timelier entry into the workforce. To achieve this the new body can take advantage of 'stackable' qualifications. Furthermore, to strengthen industry links a new awarding body should work with recognised and existing providers within the sector to co-brand existing provision, this would also help significantly with timelier access into the workforce.

Teaching professionals within the college sector seek a qualifications body that delivers strong awards effectively, efficiently and on time – a communications strategy that involves much wider engagement with all stakeholders, including the college sector will be essential in achieving this.

Learner representation and engagement must have significant input into the new qualifications body. The views of college learners and those with specific needs within these groups, such as ESOL learners and care experienced learners need to be represented, there must be a forum within the new qualifications body that engages with college student associations to represent their members. There is also a need to recognise that the design of any learner representation reflects the various SCQF Levels of study to ensure that all are enabled to engage fully in discussions around award design and content.

There is a desire in the sector for qualifications that are more flexible and that can be delivered over fewer, larger, more open units. Furthermore, there is a call for more common units and fewer varied units within different courses, which in many cases are very similar. Doing this helps to provide space for regional variation based on local partnership knowledge of skills needs. By reducing duplication and overall volume and repetition of assessment this will help put twenty-first century skills and creativity at the heart of the qualifications, allowing for greater flexibility to study and work and partner with employers in their design and delivery.

A new qualifications body can place Scotland within its global context – expanding qualifications to UK and European markets – overcoming existing HN copyright issues and augmenting the profile. This will result in strengthening the position of vocational and technical qualifications in Scotland.

Issues with the Bill

The sections of the Bill dealing with the Inspectorate are confusing – the role of the Inspectorate in relation to colleges needs to be made clearer. This is partly due to the definitions of a ‘relevant educational establishment’ and an ‘excepted establishment’. It should be made clear which of these refers to colleges. Moreover, there is no reference to the new Tertiary Quality Enhancement Framework and no description of how the work of the Inspectorate will relate to this while avoiding duplication and overlap.

With regards to the Learner Charter and the Teacher/Practitioner Charter, we would welcome the consistent use of language as “learners” rather than the use of “Children and Young People”.

Consultation in the development of the charters should ensure engagement from a broad range of centres and should widen the scope further than primary and secondary schools to ensure the charter is inclusive and reflective of the needs of all learners.

Colleges Scotland
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Education Bill Consultation – Colleges Scotland Response – December 2023

Introduction

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Colleges Scotland has had extensive engagement with the Scottish Government on the Education Reform Agenda to date. Colleges Scotland welcomes the opportunity to provide views for the Education Bill consultation around what a new qualifications body and approaches to inspection could look like to support learners, communities, employers, and the Scottish economy.

When colleges thrive, Scotland thrives, and we have considered the key questions ‘what does good look like?’ and ‘what are the barriers to good?’

Questions

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?

Our consultation with the college sector on this Education Bill has evidenced that there is a need for change. There needs to be a focus on balancing learning and assessment. The emphasis should be placed on developing skills in parallel with knowledge, with the aim of taking the onus off the final assessment for learners. Although this would be a significant shift within educational practice it would be an important step in enhancing learning outcomes.

Key Points for Consideration:

- Qualifications should be developed in a systematic manner which considers the education sectors involved in delivery of all Scottish Credit and Qualifications Framework (SCQF) levels.
- There needs to be parity of esteem for vocational subjects in order to strengthen Scotland’s tertiary offer, incorporating a focus on qualifications that reinforce institutional diversity, curriculum specialisms and industry partnerships.
- Qualifications should be delivered by staff who have specialist subject expertise in their field to ensure the teaching is contextualised and relevant to current industry requirements. Implement a system where industry professionals co-create, collaborate and review curricula, ensuring real-time relevance to industry. Emphasise practical skills and real-world applications to enhance employability.

- This delivery needs to be supported by the provision of high-quality staff development and underpinned by robust internal and external Quality Assurance systems – enabling on-going staff development is crucial.
- Introduce a robust digital platform for remote learning and virtual reality-based practical sessions, catering to the diverse needs of learners and technology-focused subjects to keep pace with the evolving job market. This should be complimented by the introduction of new models of development which will ensure that HN qualifications are regularly updated and kept current, to maintain relevance and effectiveness.
- Consideration should be given to more aligned technical qualification pathways from S3 towards HN level linked to regional skills.
- There should be an opportunity to expand the qualifications to UK and European markets, augmenting the profile, and in time, transforming the position of vocational and technical qualifications in Scotland.

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?

From consulting with the sector there is consensus that arrangements should be developed to ensure that current practitioners have multiple opportunities to feed into decision making and ensure representation from various educational levels and regions. This should include a structure that has on-going consultation and engagement using service design principles. An existing example of this is the Next Gen SQA external reference steering group.

With regards to the proposals for a Board and Committee, as well as the Charter, there is broad consensus that these developments are welcome. With that said, further details should be provided regarding the roles each would play – it is vitally important that students have the ability to shape their development.

Key Points for Consideration:

- The argument has been made that the term ‘teaching profession’ assumes that teachers are the only users or deliverers of SQA qualifications, when this is not the case – there are also college lecturers, instructors, and VQ Assessors working within the college sector who utilise these qualifications.
- Teaching professionals within the college sector need a qualifications body that delivers strong awards effectively, efficiently and on time – a communications strategy that involves much wider engagement with all stakeholders, including the college sector will be essential in achieving this.
- The development of routine feedback loops from the sector into everyday operations and involving practitioners in product development will be helpful in decision making in the new organization.
- There should be cross-sector representation on inspection teams to feedback to qualification delivery and design.

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?

In order to ensure that the views of college learners and particular learner groups including ESOL learners and care experienced learners are represented, there must be a forum within the new qualifications body that engages with college student associations to represent their members. This learner representation and engagement must have direct input and not only through representative bodies.

We would query whether the ambitions of engaging the student voice are aspirational enough. There is a need to understand what the terms of reference for the committee could look like and to understand how long members would likely sit on the committee so as to ensure that it does not stagnate and that work progresses regardless of changes in membership.

Any engagement with college learners should consider what impact our qualifications have on young people and what unintended barriers do they face in navigating particular assessment regimes. This is where a committee that commissions feedback surveys or feedback reports would be useful.

Key Points for Consideration:

- Learners are the experts in their own learning and not all learner journeys are the same, so it is vital that fresh voices from a cross-sector of society are heard and represented. In addition, it should be ensured that processes for recruitment to the committee are both robust and transparent and that support mechanisms are available and in place to ensure that members are able to contribute meaningfully.
- We welcome that there is a commitment to ensuring qualifications that will fulfil the needs of learners and to improved outcomes for learners as they move through education into employment, with recognition that there are other diverse aims for some learners.
- We would suggest the creation of learner advisory groups to provide continuous feedback on the curriculum and assessment methods.

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

Qualifications are reliable when they have a requirement for robust internal Quality Assurance systems and when this process is underpinned by robust and consistent external Quality Assurance. All delivering institutions should be required to demonstrate their ability and competence to deliver high quality qualifications. It should also be taken into consideration that quality improvement and enhancement are of equal importance and should be standardised, with sharing of practice and support for improvement.

Moreover, design of vocational course content needs to remain current and responsive to employer and learner need. A focus on broader frameworks in support of the principles of timeless and open qualifications, predicated on intended skills outcomes, would increase the longevity of qualifications and support centre flexibility. Design should also adhere to HN Next Gen principles – based on smaller components building to create qualifications that are ‘Stackable’ with stand-alone parts.

Having a process of accreditation is essential and rating qualifications at various levels will be part of this. National Occupational Standards (NOS) have been a useful tool for assessing how comprehensive vocational qualifications are, although it will need to be established who is responsible for owning and reviewing them. SCQF Partnership should also be recognised in terms of their role.

Key Points for Consideration

- A key national driver should be the opportunity to augment, raise the profile, and in time transform the position of vocational and technical qualifications in Scotland.
 - Ensure industry partners are involved in this review process.
 - Foster continuous professional development for educators to maintain high teaching standards.
 - Ensure on-going international comparisons of Scottish qualification structures, attainment levels and outcomes.
 - Ensure cross-sector and industry representation on inspection teams to feedback to qualification delivery and design.
- Technical and vocational qualifications could be aligned to the Worldskills Occupational Standards to ensure they are reflective to international best practice.
- Within this overarching framework, it should be ensured that qualification frameworks support greater adaptability. For example, a focus on Higher Education qualifications across SCQF levels 7-10 which are broader, and made up of fewer specific units to facilitate more regular review and local adaptation.

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?

The new qualifications body should work in a way that it interacts more effectively with those who direct learning and teaching within colleges. The new body should have an interdisciplinary approach, with a culture of openness, and be willing to meaningfully engage and listen to stakeholder views including those of the college sector. It should be agile and responsive to changing societal and industry needs as per colleges within their regions.

The establishment of a National Forum is broadly welcomed, however this should be an open, regular forum based on delivering what is required.

Sharing data will be key element of cooperative working for the new qualifications body as well as providing transparency in the delivery of outputs and key activities. The principle of simplicity should be paramount and a commitment to communication in clear language should be key. Data sharing and joint research projects will also help to identify and address educational gaps and trends.

The current education and skills landscape is cluttered with numerous bodies and committees potentially leading to confusion and inconsistency. There should be a focus on the learner's success and progression, removing unnecessary barriers, and this can be achieved by greater collaboration across the education and skills agencies.

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

In our opinion the emphasis should be placed on the learner, whilst supporting capacity-building for institutions and sharing of effective practice and purpose. Further focus could be placed on sustainability, global citizenship, and digital literacy.

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 add or change?

It is unclear as to how the proposals will relate to the current tertiary review processes currently being undertaken through QAA and the SFC. There is therefore a risk that a lack of consultation with this process will result in duplication of review and inspection by multiple agencies – this needs to be avoided.

It should be taken into consideration that private training providers deliver National and Higher National Qualifications but are not inspected in terms of the quality of the delivery of learning and teaching.

Consideration should be given as to the needs of specialist institutions and other relevant types of educational establishments as well as emerging forms of education like online learning platforms – these would require different inspection criteria.

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?

The inspectorate should have a role in enhancement where they support the development of learning and teaching. These inspections should be collaborative development sessions, where inspectors work with institutions to co-create solutions to challenges and share best practice. There must be an ongoing dialogue with colleges based on where they are in their improvement journey, based on concrete examples that have had impact.

Key Points for Consideration

- Initial Teacher Education should be inspected to ensure that there is a consistency across providers and the skills required for modern delivery are covered (eg developing assessment approaches).
- Any new inspection model should not lose the strengths of the previous review model in colleges which used Associate Assessors to build capacity, carry out peer review activities and add strategic value both in their own institutions and across the sector.
- Implement a system where students can rate and review their institutions, contributing to the inspection process.
- Colleges are moving to a single tertiary quality framework with universities, therefore, to ensure understanding and a broader approach to learning and teaching, expand the inspection remit to form a tripartite review structure where schools, colleges and universities representatives form part of the inspection teams. This will allow a much more holistic approach to review and scrutiny.
- Ensure the process supports the effective alignment of our tertiary education system, supporting a review framework which drives self-evaluation rather than external measurement, capable of discerning quality rather than a short term focus on annual KPIs.

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?

Key Points for Consideration

- Inspection priorities need to be well balanced between learning and teaching outcomes, in conjunction with the development of meta and soft skills.
- Inspection should include the assessment of how well institutions adapt to technological advancements and changing societal needs.
- Inspection should be a positive process for practitioners and should include a conversation between peers that results in the wider sharing and adoption of best practice and the enhancement of provision at all levels.

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

Accompanying the new approach to inspection there should be robust legislation in terms of duties, this would include reporting, impartiality and accountability. It is seen as being a route to creating the highest degree of independence, and thereby increasing confidence in the work of the inspectorate.

It would also be constructive to create models that promote self-evaluation alongside external inspection. Further to this there should be an exploration of more collaborative approaches where inspectors work closely with institutions for continuous improvement. As well as this there could also be consideration of AI-driven inspection processes, with algorithms analysing data to provide insights and improvement plans using institution performance metrics and data.

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?

Key Points for Consideration

- The direct involvement of teachers, other practitioners and learners in the governance arrangements is essential in any new model.
- Expand the inspection remit to form a tripartite review structure where school, college and university representatives form part of the inspection teams.
- Implement mechanisms for regular feedback from the educational community to the inspectorate.
- Deliver a much more standardised approach to sharing sector best practice on learning and teaching, college structures and systems.
- Colleges are moving to a single tertiary quality framework with universities this will help to ensure understanding and a broader approach to learning and teaching - allowing a much more holistic approach to review and scrutiny.

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?

Key Points for Consideration

- Public reports need to be meaningful and understandable and an annual report to the Scottish Parliament by the Chief Inspector would be appropriate.

- By setting out in legislation the requirement to report annually on the performance of Scottish education, publish individual inspection reports, and to lay reports directly before the Scottish Parliament may provide a more robust and consistent approach to informing stakeholders about improving outcomes and experiences for learners.
- Evidence from inspectors should drive the publication of thematic and topic-based recommendations and examples of best practice that are openly available to all. The accumulated knowledge and understanding gleaned by inspectors should be shared to further enhance best practice.
- It would be beneficial to have an annual report on Scottish Education, as this provides an opportunity for collaboration amongst relevant stakeholders to tackle the issues to drive improvement.

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December 2023