**Post-School Education and Skills Reform: Consultation on legislation**

**Respondent Information Form**

**Please Note** this form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy: <https://www.gov.scot/privacy/>

In this section, we are asking for details about you, including the capacity in which you are responding. If you are responding as an individual and have indicated your preference to publish your response without your name, the category you have selected below will still be published with your response. These categories will help us when analysing responses and will give us a better understanding of the views of each type of respondent.

Are you responding as an individual or an organisation?

[ ]  **Individual**

If you are responding as an individual, in which capacity are you responding?

[ ]  As a learner (student, apprentice, community learner) aged 21 or under

[ ]  As a learner (student, apprentice, community learner) aged over 21

[ ]  As an educator (teacher, lecturer, board member, support staff, researcher)

[ ]  As a manager or employer (e.g. manager in a larger business, self-employed business owner or employer)

[ ]  Other (please specify)

x[ ]  **Organisation**

If you are responding on behalf of an organisation, what type of organisation is it?

x[ ]  Fundable education body (colleges, regional strategic boards, universities and Higher Education Institutions)

[ ]  Local authority or school

[ ]  Other public sector body or employer (funding bodies, NHS, prisons, police but **not** colleges)

[ ]  Training provider (where this is your only or main function)

[ ]  Private sector business or employer

[ ]  Third sector or charitable organisation (if not any of the above)

[ ]  Trade union or other staff representative body

[ ]  Student interest or representative body

[ ]  Sector or business representative body

[ ]  Other (please specify)

Full name or organisation’s name

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**Information for organisations:**

The option 'Publish response only (without name)’ is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

The Scottish Government would like your

permission to publish your consultation

response. Please indicate your publishing

preference:

x[ ]  Publish response with name

[ ]  Publish response only (without name)

[ ]  Do not publish response

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

x[ ]  Yes

[ ]  No

**Questionnaire**

**Simplifying responsibilities for apprenticeships and student support**

**Question 1**

Which if the three proposals do you prefer?

[ ]  Proposal 1

x[ ]  Proposal 2

[ ]  Proposal 3

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Please expand on your answer below.

For clarity. Proposal 2 avoids creating a super-entity with multiple core purposes. Proposal 3 runs the risk of competing demands for priority between provision funding and student support.

Proposal 2 provides a clear line between provision funding and student support. While there is clear sectoral support for change, proposal 3 would potentially require significantly more restructure and entail corporate learning deficits, almost inevitably leading to chaos in Year 1 and potentially beyond.

Removing student funding from SFC means it can fully concentrate on funding the tertiary sector appropriately and ensuring institutions are held fully to account.

Student support sitting with SAAS will provide a clear focus on student needs and a transparent alignment of appropriate funding to support them.

However, any changes need to ensure that existing pressure points are not exacerbated by any change eg SAAS would need to ensure face to face student support is maintained in certain space such as Bursaries, rather than switching to their current online reliance. This is particularly important in the college sector to ensure socio-economically vulnerable students are not excluded.

**Question 2**

What do you think are the main advantages of your preferred proposal?

Please give us your views.

A straightforward single entity with the single purpose of assisting students to access support is more likely to be accountable and understood by students. To make it even more readily understood with its modified role, it could perhaps be renamed Student Support Scotland or triple ‘S’. Simplifies access and understanding for students.

SFC already has a huge remit and keeping student support separate allows them to focus more clearly on their core purpose.

It also means that SFC and SAAS both simply do more of the core work they already do rather than facing massive restructural and corporate learning challenges.

Delivers on both clarity of access and vision of purpose .

**Question 3**

What do you think could be the biggest challenges with your preferred proposal?

Please give us your views.

Any major structural change comes with risk of disruption for services for student support eg corporate learning of new roles, technological integration etc. However, we believe this proposal comes with least risk as it is essentially an expansion of current service provision for both colleges and students.

However, it will require pre-agreed speedy and acceptable response times and/or local arrangements with colleges to ensure FE students, particularly those with serious cash flow problems, are supported timeously.

One serious cause for concern is the SAAS preference for providing support almost exclusively online. Many of our students need significantly more support than that and there would be a continuing need for face-to-face assistance. There is also the potential for staff upset and service disruption depending on any new arrangements,

There are concerns with regards to the SFC awarding commercial contracts to private companies and training providers.

There will need to be extremely robust governance processes and policies as to how public funds are allocated.

It would also be important to have clear checks and balances on why public funds would be assigned to private companies rather than public sector organisations which offer the same products/services/learning/skills. This should include assessments of social impact.

**Question 4**

Are there any other factors you think we should consider in making a decision?

Please give us your views.

Costs of initial integration and staffing disruption.

If Bursary Funding is removed from colleges, this raises questions about staff in college and how each college’s funding team may need to change.

Bursary Funding is flexible and colleges have some autonomy on how this is best used. How would the changes enable colleges to continue to have this flexibility and autonomy?

Colleges often have funding readily available for students to access while they wait for SAAS funding which can take some time. There needs to be assurance that this support will continue.

Students in receipt of Bursary Funding often need more support to complete applications which is provided in-house by colleges. If this then becomes the responsibility of SAAS how will this be managed?

There also needs to be a better aligned system for supporting FE students to ensure consistency of support based on need.

**Governance of the Scottish Funding Council**

**Question 5**

Should the 2005 Act be amended to remove the restrictions in respect of Board appointments?

[ ]  Yes, for both the term and reappointments

[ ]  Yes, for term only

[ ]  Yes, for reappointments only

x[ ]  No, I have a different suggestion

Please expand on your answer below.

Clearly there is a need for greater flexibility in appointments to lead to more effective governance and better alignment with long-term goals. Without proper checks and balances, there could be risks related to reduced accountability and diversity of thought.

The primary aim of this proposed change appears to be to extend terms of office for Board members to allow adequate succession planning.

We recognise it often takes Board members time to settle in to remits and maximise their input, so it makes sense to consider greater flexibility in term lengths, particularly during periods of reform.

However, firstly, this would make the SFC an outlier in the public sector in terms of Governance.

Secondly, the current legislation allows for up to EIGHT years of Board membership – four years plus an extension of four years if deemed necessary – which seems more than adequate for any succession planning. Furthermore, there are other existing options which could result in individuals being allowed even longer terms.

By extending terms by default, the very flexibility desired to meet evolving sectoral landscapes could be removed, thereby defeating the original intent of the proposed change and resulting in a stagnation of strategic vision.

**Question 6**

If SFC takes on responsibility for all apprenticeship funding, what additional skills, knowledge and experience should be considered for SFC Board members?

Please give us your views.

Board will need a mix of new skills and experience ranging from cyber to AI. They should understand apprenticeship programmes and workforce development, ensuring these align with industry needs. Knowledge of educational policy and funding is crucial, along with strategic planning and governance skills to integrate these new responsibilities smoothly.

Experience in industries that rely on apprenticeships, like manufacturing or health and social care, would be valuable. Educational leadership and public sector experience, especially in roles related to vocational training and policy development, are also important. Engaging with stakeholders, including employers and educational institutions, will be key to building effective partnerships.

The Board should have a diverse mix of expertise to manage the expanded roles effectively. Their backgrounds should allow them to effectively support both students and apprentices in their educational and career paths along with the needs of the educational institutions.

With regards to apprenticeships funding, it will be key for SFC Board members to have knowledge of Foundation Apprenticeships, which is often led by local authorities and school-college partnership managers.

These would be key individuals to have in order to ensure that SFC can make informed decisions about the future and funding of these apprenticeships. Furthermore, having key employers linked to apprenticeships would be helpful.

However, very careful consideration has to be given as to how this is balanced with the need to have clear procedures, processes and governance around public funds being awarded to private companies with which Board members may have historic or existing connections to ensure total transparency.

Consideration should also be given to greater college and student representation to remover current imbalances.

**Question 7**

Do you have any other comments or suggestions for governance of the SFC Board or other aspects of SFC governance?

Please give us your views.

All governance arrangements which would need to be introduced regarding funding for private training firms must be robust and completely transparent.

While it would be important to have Board membership knowledge of apprenticeships, there also needs to be clarity around the procedures to ensure potential conflicts of interest are identified and there are processes for dealing with them in an appropriate manner.

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**Enhanced functions for the Scottish Funding Council**

**Question 8**

Do you think we need to introduce new duties on organisations receiving public funding to provide better information to SFC?

[ ]  Yes, for all organisations

x[ ]  Yes, for some organisations

[ ]  No

[ ]  Don’t know

Please expand on your answer below.

The funding of private organisations means there should certainly be a review of duties to ensure they are given the same levels of scrutiny as colleges.

If any changes are introduced to the college sector they need to be introduced without added complexity. There also needs to be a look at removing duplication of reporting eg between QAA/Education Scotland and SFC.

There should also be a review on both what information is being asked for and the speed with which this information is published to allow more speedy benchmarking, responses to new trends etc.

Additional duties for private providers to give information to the SFC could be beneficial. This should include reporting on their social impact.

Any organisation in receipt of public funds must be fully accountable to the SFC using the same scrutiny and audit processes.

**Question 9**

Do you think there is a need to strengthen existing systems and processes for **collecting** data?

x[ ]  Yes

[ ]  No

[ ]  Don’t know

Please expand on your answer below.] If you answered yes, then please explain why the data is needed.

Strengthening existing systems and processes for collecting data has value provided the data being collected is relevant and does not result in duplications of effort.

Improved data collection can lead to better decision-making which is both informed and evidenced allowing for more effective allocation of resources and enhanced accountability.

Among the process improvements must be a commitment to ensuring any information collected is released more timeously to allow colleges to make more efficient and effective use of it.

It would also be helpful if, as part of any improved collection and use of data, the sector saw some additional ringfenced investment in CRM and similar systems to maximise impacts.

In addition, there should be alignment in data collection formats, evolving assessments of what data should be collected and why and robust protections and guidelines around all information gathered.

Data should also be collected and shared in one shared sectoral space from additional sources eg local authorities, health boards, FEIs, publicly-funded private training providers etc to better assess impacts within communities, eg on poverty, and to better align Regional needs alongside educational offer.

Data sharing with organisations such as QAA/Education Scotland may also remove some of the duplication of effort required of colleges.

It is particularly important that relevant data is collected from private trainers who are effectively in competition with colleges. It is not reasonable to allow a ‘competitor’ access to colleges’ data without reciprocal data access. A level playing field is essential to ensure a strong and socially impactful college sector and value-for-money for taxpayers.

It would be helpful if the data could align with TQEF and could be accessed earlier in the academic year to assist with review, enhancement and planning.

It would also be able to align all data collected in one place instead of universities having to report to HESA and colleges reporting to the SFC.

**]**

**Question 10**

Do you think there is a need to strengthen existing systems and processes for **reporting** and **publishing** data?

x[ ]  Yes

[ ]  No

[ ]  Don’t know

Please expand on your answer below. If you answered yes, then please explain the purposes for which you or others might use the information.

To allow for accountability of funds for all organisations drawing down public contracts there should always be a vehicle for publishing data to ensure value for money and trust from the public.

This is particularly important when money is being given to both public and private institutions. There must be clarity of what, how, why, when and where ALL finances have been used.

Better reporting and publishing of data will improve assessments of educational delivery and needs alongside that of Regions. It also allows for greater scrutiny of success and failure in all areas including student satisfaction and social impact.

**Thoughts/amendments?????**

**Question 11**

What information about funded organisations would you most like to know and why?

Please give us your views.

Sources of income and expenditure – transparency, ensure value for money

Performance data – to benchmark, assess trends

Learning projections – to plan for the future more effectively in line with Regional needs

Delivery Projections – to assess and benchmark success

Social impact – to assess and benchmark success and assign additional value to the learning provision delivered

**Question 12**

What, if any, additional powers should SFC have in order to help ensure the post-school education and skills system operates effectively?

Please give us your views.

To ensure effective post-school education and skills, the SFC could benefit from additional funding specifically linked to delivering unified sector-wide data submission, collection and analysis systems.

This would facilitate greater flexibility of response in areas such as performance monitoring, flexible funding allocation, drive better outcomes and ensure efficient use of public funds.

Explore delivering Foundation Apprenticeships as part of post-school education