



Solace Scotland response to the Education Reform Consultation (December 2023)

Introduction

The Society of Local Authority Chief Executives and Senior Managers (Solace) Scotland is the representative body for Chief Executives and Senior Managers working in the public sector. We are a non-political, pan-public sector professional organisation committed to promoting public sector excellence. We provide our members with opportunities for professional development and seek to influence debate around the future of public services to ensure that policy and legislation are informed by the experience and expertise of our members.

We have circa 200 members, which includes all of Scotland's 32 Local Authority Chief Executives, responsible for almost £19bn collective budget and over 240,000 staff who provide a huge range of essential services to the entirety of Scotland's population.

While Solace welcomes the opportunity to respond to this consultation, there is a frustration that many of the questions posed as part of this exercise were asked and answered in the Hayward Review, a point we will expand on forthwith. We have been close to education reform discussions for many years, most recently through membership of the Reform Oversight Board, and work closely with colleagues in COSLA and ADES to try to ensure that national education policy is informed by our members wealth of knowledge and experience.

Assessment of current context

The scale of the risk and fragmentation in the national discourse around public sector reform is alarming and Solace has significant concerns about the direction that national policy is taking. There is a lack of coherence across public sector reform which includes education reform, the National Care Service as well as the unfinished local governance review. There is, at best, a piecemeal approach to reform in Scotland to the detriment of the future of public services, the state of public finances and most importantly, to the people that use and rely on public services. The principles of localism and the Verity House Agreement must form the basis for future discussions and negotiations if we are to have a public sector that meets the needs of communities.

Recent developments surrounding the reform of education have been chaotic, fragmented and not led by the Scottish Government's own evidence. The education reform landscape is incredibly dense, with multiple overlapping workstreams and no clarity on intended outcomes or alignment with the wider reform agenda. There are many opportunities outlined in the multitude of external reports on the direction of education reform, including Professor Mark Priestley's review of national qualifications in 2020, Professor Kenneth Muir's report in March 2022 on the replacement of the SQA and reform of Education Scotland, a review of skills delivery by James Withers in June 2023 and the publication by Professor Louise Hayward, also in June 2023, on a review of qualifications and assessments. The number of reports and recommendations in the last few years alone has overwhelmed the system and with the addition of this consultation, we are at risk of duplicating work that has already been undertaken instead of progressing meaningful change that will benefit learners.

Solace views the recent announcement regarding the tapering of funding for Regional Improvement Collaboratives (RICs) and the creation of a new Centre for Teaching Excellence as short sighted and



we are disappointed at the lack of any engagement or consultation with local government prior to the announcement. This approach was contrary to the Verity House Agreement, which committed to consulting and collaborating as early as possible with local government in all policy areas as well as evidence-based policy decisions. RICs have only been established since 2017 and the good work that they have achieved in that short time has been largely dismissed. RICs need more time to 'bed in' and we should be taking learning from RICs that have exemplified leadership, support and improvement and translating this across the country, taking local circumstances into account, rather than making unneeded structural and legislative changes.

The Scottish Government's own International Council of Education Advisors (ICEA), on the very same day of the RICs announcement, released a report recommending the strengthening of regional connections between schools and highlighted the role of RICs in promoting collaboration across boundaries. It is vitally important that any new approaches are underpinned by robust, current research and evidence and are informed by industry professionals and experts to ensure they reflect best practice.

We would also like to take this opportunity to highlight the interconnectedness of education and educational attainment with other areas including poverty, housing, economic development and culture and leisure, all of which have been affected by cuts to the local government budget over successive years. A strong, empowered and appropriately funded local government is needed to continue to build prosperous and empowered communities. Councils know their local areas and what action needs to be taken to improve local places, however underfunding of the sector has led to increasingly unpalatable decisions having to be taken locally which are adversely affecting those most vulnerable in society who rely on the services we provide.

Establishment of a new qualifications body

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?

Development of qualifications should be reflective of the changing needs of society and the need for real life skills, current labour market needs, and the skills and attributes required by the vision for Scotland's future society and economy. Current qualifications do not meet these needs.

Learners in Scotland are amongst the most heavily examined in the world. There is a need to reduce the number of formal examinations, while still retaining those most appropriate to the subject matter in hand. Other means of assessment including internal and continuous assessment elements at subject levels should be revisited, to evaluate their value in terms of evidencing students' skills, knowledge and learning, and we should use and trust teachers' professional judgement in this respect.

Examinations are largely a test of memory and a more varied approach to qualifications would better prepare students for real life.

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?

The views of the teaching profession were provided on this matter as part of the Hayward Review. The new qualifications body must include a transparent and accessible development process that ensures meaningful practitioner involvement throughout. Clear routes that allow teachers to share their experience and expertise around qualifications should be designed. Teachers and practitioners from a diverse range of backgrounds and areas should be represented within the new qualification body (for examples teaching professionals from rural and island areas, ASN and schools with a broad SIMD profile).

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?

Student representatives should be key stakeholders on the Board of the new qualifications body. It is essential that young people are consulted at every level within the organisation, including representatives from diverse backgrounds, to capture a wide range of viewpoints.

The commitment to listening and taking on the views of young people needs to be genuine, and not become tokenistic or cursory. The new body will need to be prepared to recognise the views of learners and translate them into appropriate practice.

A variety of communication methods including surveys, events, social media etc., should all be utilised to engage with learners on a regular basis. This will ensure continuous opportunities for learners' feedback and experiences to influence decision making.

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

It is important to maintain the external exam system and an examination body that offers quality assurance over the processes. These processes must be clear and transparent, impartial and consistent to maintain the rigour and integrity of the examination processes. A mixture of external and internal/continuous assessments, however, would allow for a fairer representation of learners' abilities. New and innovative ways should be sought to assess young people on their learning journeys and international benchmarking would be a beneficial exercise in this regard.

Steps to ensure reliable, high-quality qualifications could include an independent accreditation process and clear accreditation criteria. This should be supported by professional development for educators and incorporation of user feedback. Involving a range of stakeholders (educators, professionals and students) in all stages of the qualification process including design, review and evaluation will strengthen the relevance and coherence of the qualification system. New approaches and qualifications should be evaluated and reviewed regularly and be underpinned by robust quality assurance mechanisms that support continuous improvement.



Building on the point made earlier in this response, the current examination system is largely built around recall and does not assess young people on their understanding, skills or ability to apply the knowledge that they have acquired. We need to develop a qualification system that allows learners to demonstrate their learning in different ways, in different contexts, aligning more closely with the real, post education contexts and workplace expectations.

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?

Continual engagement with all stakeholders including teaching professionals, industry experts and young people would facilitate better collaborative working across the education and skills system, to achieve better outcomes for all. This could be achieved through an enhanced national forum to ensure that a diverse range of views are heard, and the perspectives, knowledge and expertise of members are used to inform decision making around qualifications.

It will also be important to work closely with education and skills bodies, including universities and higher education institutions, as well as business and employers, to ensure that qualifications are not only aligned to the needs of young people, but to deliver on the skills and outcomes needed in the workplace economy.

Reform of Education Inspection

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

We agree with the purposes set out. We would highlight that it is key that flexibility is built into the inspection process to allow the system to respond to any changes or emerging educational needs.

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?

Solace agrees with the range of establishments to be inspected. We would highlight local authority led Validated Self-Evaluation Visits as a positive addition to the landscape and it is hoped that the advancement of a Collaborative Improvement Model developed by ADES and ES will provide a collaborative approach, while still involving the new inspection body. Councils are uniquely positioned to know their learning establishments well and this should be reflected in discussions around inspections.

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?

No specific comments, we agree that the same principles of inspection should apply to such institutions.

Priority Issues

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?

We agree with the priorities set out. We would highlight the importance of inspection teams having good experience of different educational contexts e.g., large, small, urban and rural settings, to allow contextual nuances to be understood and reflected in inspection processes. They should avoid a 'one size fits all' approach to inspection while ensuring consistency to reduce variation in experience of inspection.

The inspection model used during Covid recovery visits, where local authority staff took a more active role in the inspection process, should also evolve to become standard practice. A collaborative approach between the inspectorate and schools will ensure a greater focus on improvement and is a more meaningful and empowering tool of inspection. This collaborative approach empowers and supports school leaders to gain a deeper understanding of areas for improvement while building staff capacity. It also helps to build good relationships between the inspection body and schools/local authorities and provides confidence in the inspection work. Improvement, capacity building and informing good practice should be prioritised.

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

It is vital that the role of Chief Inspector of Education for Scotland is an independent office holder, and this should be established by legislation. Independence is crucial for impartial judgements. This will enhance accountability, confidence of stakeholders and the independence of the inspectorate.

It is Solace's view that it would also be beneficial to better engage with local authorities when it comes to setting the schedule, frequency and focus of inspections, across the breadth of inspection activity, not just those in the education space. The inspection and audit landscape is very cluttered and local authorities can be faced with multiple inspections in quick succession which can prove challenging in terms of capacity of senior staff and ability to engage meaningfully with the process.

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?

As highlighted elsewhere in this response, enhancing involvement of school based and local authority staff in the inspection process would be a positive development. A collaborative approach should underpin the work of the inspectorate and would result in a greater focus on improvement.

Stakeholder forums could serve as a platform for open communications to allow for regular input and feedback.



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?

We would support a move away from the grading system. Grading is unconstructive to the improvement agenda, not supportive, and can often cause a great deal of stress to staff and families. We should absolutely retain the rigour around areas for improvement, strengths and next steps, however, we believe this can be better achieved with the removal of the grading system.

Evidence from inspections can lack detail and can often be presented in a way which does not support improvement. Making the inspection process and subsequent results open and transparent, which includes involvement from local authority teams, will aid their effectiveness at driving improvement.