

# The Requirements for Community Learning and Development (Scotland) Regulations 2013

## CONSULTATION QUESTIONS



### 1. How well do you think the draft SSI will help to strengthen the legislative basis for CLD?

There are mixed views across the range of responses we received from our members and supporters. The SSI is viewed as a welcome move by those who feel that CLD has been sidelined by government for many years and where provision at local authority level is described as patchy. This diversity has led to a weakening of provision on most levels of operation. Those who welcome it also feel however that it is weak in areas.

Significantly, however, there is a view that this “move” could undermine the basic principle of community based learning which is predicated on an open, flexible and democratic process. Given that the purpose of community engagement is to inform policymakers, not simply act as a conduit for implementing policy at local level, this top down approach, with a bureaucratic thread could be argued to be misplaced, become a tick box exercise. There is also a denial of the need to acknowledge the inherent tensions between communities and policy makers and agents of same. This is the healthy underpin to mutual engagement and democratic conversation.

### 2. Are there aspects of the draft SSI that you think could be improved?

Yes  No

If yes

- What are they?

The overall accountabilities in the context of much wider engagement, in particular with an ever important Third Sector – community based planning systems and structures have failed in this so far. How would communities hold Authorities accountable?

Levels of provision could be alluded to. This approach lends itself to token service provision.

Overall the wording could be far more community, client and learner centred rather than service provider loaded. Given other areas of policy – GIRFEC, Early Years, ALIS, Youth/Employability – the Regeneration Bill comes to mind often as a home for this.

**- What is the nature of the change you think should be made?**

The idea of 3 year work based plan outcomes seems to suggest a lack of flexibility to move and meet local requirements and may leave the decisions to be made with a newer version of what exists, what has been described as a "consultative elite."

The top down nature flies in the face of the CLD guidance; it implies a "roots up" approach.

Is Education (authority) the place for this legislation...where is the accountability re the wider perspective of community based learning? Should a wider range of planning areas be built into the consultation expectations?

Will the lack of resources to achieve what is included in plans simply let deliverers off the hook in terms of accountability? Top down tick box implementation without community based influence encourages this.

There is insufficient attention given explicitly to the third sector involvement. The model of Community Planning engagement has failed to this point. There is nothing here to suggest it will be more robust.

Members are suggesting that a sign off involvement by local third sector groupings would enhance all aspects of democratic engagement; they are not explicit in this format.

There is a concern that this approach could lessen the level of community engagement, given its narrow tracked routing from Education through community planning and that the opposite of what is intended could be achieved. Community disempowerment (Members believe that this flies in the face of Community Empowerment and Renewal bill.)

Suggestions for changes are made under separate cover, other submissions – in the interests of brevity here.