



CLD Standards Council Scotland

Members Consultation Report

In response to

Education Reform
Provisions of the Education Bill
December 2023

Prepared by Vikki Carpenter
Development Officer: Policy

About Us

The CLD Standards Council Scotland is the professional body for people who work or volunteer in community learning and development (CLD) across Scotland. As a member-led organisation, we have a growing membership of over 3,000 members, an executive committee and 3 functional committees which are made up of members from across the sector in Scotland. Our approach and work plans to deliver our core responsibilities are defined by our member committees and based on feedback from the wider membership.

Our core responsibilities are:

- Deliver a professional approvals structure for qualifications, courses and development opportunities for everyone involved in CLD
- Maintain a registration system available to practitioners delivering and active in CLD practice
- Develop and establish a model of supported induction, professional learning and training opportunities

Vision

“Our vision is that the communities and people of Scotland are served by CLD practitioners that are recognised as competent, confident and committed to equality, empowerment and life-wide learning for all.”

Mission

“Our mission is to drive high standards of professional practice in the CLD sector by the approval of professional learning, the registration of practitioners and the enabling of professional development, working with our members to be a voice for the profession.”

For further information on the CLD Standards Council, please visit our [website](#) and view our social media [cldstandards](#) | [Twitter](#), [Facebook](#) | [Linktree](#). If you would like to discuss this response further, please email us on contact@cldstandardscouncil.org.uk

Introduction

The Community Learning and Development (CLD) sector is an integral part of Scottish education. It plays a central role in ensuring individuals, families and communities across Scotland reach their potential through lifelong learning, mutual self-help and community organisation. CLD Standards Council recognise that there is common ground as well as robust partnerships between traditional education establishments such as Schools, Colleges, Universities, and CLD in terms of values, outcomes and practice methods. It strongly believes that it should not just be traditional educational bodies making decisions on education issues such as qualifications, assessments, inspections and learning opportunities for all of Scotland's learners. It is critical that Scottish education is a leading educational system which at its core recognises and supports the needs of learners at all ages and stages in life, driving forward life wide and lifelong skills and learning for all of Scotland's learners.

The purpose of CLD is to empower people, individually and collectively, to make positive changes in their lives and in their communities, **through learning**. CLD works collaboratively to make all of Scotland's National Outcomes a reality however it is not recognised or acknowledged for its critical role across Scotland and this we would like to see changed. The Government's National Performance Framework sets out the strategic objectives for all public services, including those delivering CLD. We would like to make the most of this opportunity to raise and promote the lifelong learning, empowerment and inclusion principles surrounding community based learning including Adult, ESOL, Family Learning and Youth Work. We also would like to highlight the role and agility of Community Learning and Development practitioners and organisations who support and offer learning opportunities to Scotland's learners and communities throughout the year. CLD practitioners work within the CLD [competences](#), [values](#) and [ethics](#) to support change for others.

CLD's specific focus is:

1. improved life chances for people of all ages, through learning, personal development and active citizenship.
2. stronger, more resilient, supportive, influential and inclusive communities.

As a field of professional practice, CLD is critical in the achievement of any policy or legislation that requires individual and community engagement, partnership working across educational organisations, and development and learning. It supports the learning, growth and empowerment of individuals and communities, as well as supporting the delivery of other services. CLD practitioners work in partnership with teachers, schools, colleges and universities to support each learners journey to increase their opportunities and support the realisation and release of potential. CLD practice includes examples such as improving opportunities for learning, accreditation and skills development in rural areas, supporting learners of all ages to develop confidence, autonomy and skills, literacy and numeracy, employability, as well as support and skills development through community art projects, citizen assemblies, community participatory budgeting initiatives and supporting capacity building of community developments such as foodbanks and credit unions. All of these learning opportunities and project initiatives often support the achievement of an accredited qualification at all levels of the [SCQF framework](#).

CLD enables learners across Scotland to identify their own individual and collective goals, to take action to bring about change and through this to achieve these goals. Using a range of formal and informal methods of learning and social development, CLD programmes and activities are developed in dialogue with communities and participants, working particularly with those excluded from participation in the decisions and processes that shape their lives. Through working in these ways, and in partnership with the more

traditional educational establishments, CLD practice extends the reach of education, of democracy and of economic growth.

The CLD Standards Council consulted with a selection of its CLD practitioner members as well as its full staff team to form this response, using a number of differing engagement opportunities to capture key discussion points.

CLD Standards Council members and partners were also given the link to Scottish Government's website which offers full information on the consultation, and encouraged others to submit a full and individual response.

Assumptions:

It is important to recognise that this CLD Standards Council response provides an insight into the views and experiences based on the those responses gathered as mentioned above. Data gathered provided a valuable insight into the experiences based on the views of the member participants. This response is not representative of the entire CLD sector across Scotland or the full CLD Standards Council membership.

Response from the CLD Standards Council to Scottish Governments Education Reform Consultation: Provisions of the Education Bill

Qualifications Body:

What changes should be considered in terms of how qualifications are developed and delivered that you think would improve outcomes for Scotland’s learners?

The current approach by the SQA is not suitable for a 21st century lifelong learning system as it is based on outdated approaches which are slow and unresponsive to the needs of learners and other key stakeholders. The proposals set out in the [Muir](#), [Withers](#) and [Hayward](#) reports should be adopted and implement at pace, as implementation of the key recommendations associated with qualifications would go some way to creating a modern accreditation and assessment system enabling educators to deliver learning and teaching in an appropriate way to meet the needs of all learners, while providing opportunities to recognise attainment and achievement.

Greater accessibility, modern methods of capturing assessments and some degree of flexibility in delivery of qualifications will provide opportunities for a wider range of learners at all ages. Equitable practice is an important factor to consider when developing qualifications which will contribute to a well-established and structured system for all, and work towards Scotland’s wellbeing economy and Scotland’s [national strategy for economic transformation](#).

Project 12: Support and Incentivise People, and their Employers, to Invest in Skills and Training Throughout their Working Lives

We will	Who
Implement a lifetime upskilling and retraining offer that is more straightforward for people and business to access and benefit from. This will use evidence from the delivery of the National Transition Training Fund and Flexible Workforce Development Fund, and what we know works well from Community Learning and Development .	Government and Public Sector
Target more skills investment and support to working age people in poverty or at risk of moving into poverty (particularly the six priority family types). Ensuring that access to training for more marginalised groups is made as easy as possible, we will work with learners and delivery partners to better understand the steps we must take to improve provision, including in areas such as training at times that suit people with caring responsibilities, with additional support needs or that fit around current jobs.	Government and Public Sector
Develop a new Skills Pact to underpin our commitment to strong partnership working with both employers and unions. The Pact will focus on action we can take together to improve investment in skills and training and ensure provision better meets the needs of employers and employees. As part of this, we will work collaboratively with employers and unions to explore how we can increase employer investment in upskilling and retraining.	Government, Public Sector, Business and Partners

Ref: Page 40 Scotland’s National Strategy for Economic Transformation

SQA qualifications should be named and levelled with numbers corresponding to SCQF levels, including ESOL qualifications. CLD practitioners work with some of the most vulnerable learners of all ages through the delivery as well as assessment of qualifications at the lower levels. The differing references and number levelling often make it confusing for our CLD learners, who can be achieving an award for the first time in their lives and would like to progress further with often a view to college and beyond but manoeuvring the pathways of accreditation progression is complicated and this becomes a barrier.

A number of the CLD accredited learning opportunities are delivered by voluntary and charitable organisations such as [Lead Scotland](#). Practitioners on their helpline report an increase in calls from learners with extreme distress and anxiety, especially from young people sitting exams. To mitigate some of this

anxiety, stress and barriers to accreditation it is suggested that an increase use of wider assessment techniques would make significant impact to the most vulnerable learners along with reduction in exams where possible, and that it is essential that the new awarding body consider the needs of disabled learners of all ages unable to sit exams. Lead Scotland complete their own policy and research, and have reports such as a response to a previous SQA consultations, which you can access [here](#)

At present registration and assessment arrangements are often not fit for purpose, especially at the lower levels of SCQF framework when mandatory paperwork and binding contracts are at a significantly higher language level than the qualification that a learner is undertaking. These qualifications and their assessment options are not inclusive or equitable for CLD learners, who undertake SQA qualifications at all levels across Scotland. A review of assessment arrangements is required, with flexibility to enable those who deliver and assess to offer person centred learning which benefits the learner and is tailored to their needs as normal practice and not as a special enhancement. Policies such as "[Getting it right for every child](#)" (GIRFEC), [Adult Learning Strategy](#), along with the Youth Work Strategy which is currently being developed, Scottish Government have a commitment to provide all children, young people, adults and families with the right support at the right time, including education and skills. As stated in Theme 1 of the Adult Learning Strategy ". *Increase access to and support for accredited learning underpinned by the SCQF, where appropriate, for community-based adult learning to support positive pathways for adult learners.*" (Adult Learning Strategy for Scotland 2022-2027, P.28)

Scotland has been seen as a leader in education, embracing it through a lens of life long, life wide and skills for all. As stated by John Field in his paper on [Lifelong Learning in Scotland](#), "... persuaded both the EC and OECD to conclude that lifelong learning is not simply as a desirable policy goal in its own right, but should provide an overarching framework within which all educational policy should be developed, with the aim of achieving 'lifelong learning for all' (Schemmann 2007: 77-8, 125-9)." The new agency for qualifications should play an integral part in securing an education system which is life wide and facilitates all pathways to learning. One which values all learning occasions, and "holds informal and vocational of equal value to academic qualifications". There needs to be a change in mind-sets with regards "excellence" and that it is not about accomplishment of highest grade qualifications but "excellence" is achieved when each individual learner of any age is enabled to access the skills and learning opportunities required to reach their personal potential, to permit all learners to comprehend and excel within their interests, and consequently support a Scottish wellbeing economy.

How best can Scottish Government ensure that the views of all teaching professionals are taken into account appropriately within the new qualifications body, and do these proposals enable this?

The new qualifications body should represent the views of ALL educators not only those involved in school based teaching. It must recognise that education take place in a range of settings with learners from all age ranges. The continual focus on and use of language related to 'teachers' and school based education is detrimental to the notion of lifelong education and further exacerbates the lack of parity between professions (e.g. teaching, CLD and early years). Scottish Education, and therefore its accreditation landscape, is life long and life wide and takes place in a broad range of settings and facilities. The failure to engage a wider range of educators engaged in the current SQA governance arrangements has, in part, contributed to the lack of dynamism and innovation exhibited by this body over a number of years. There is a requirement for the CLD professional body to be directly involved in the approval and design of CLD qualifications with in the new qualifications agency. The CLD Standards Council is not a Sector Skills Council, and there is not one that currently supports the CLD sector in Scotland, therefore the CLD Standards Council has grown to fill that vacuum where it can, as defined by its current role under [legislation](#).

It is critical that the [CLD competent practitioner framework](#) is embedded and underpins all CLD qualifications for practitioners. Having professional bodies directly involved in development and approval of qualifications for their sectors would ensure relevant and purposeful progression of qualifications as well as enhance the strength of partnership and communications for professional bodies such as the CLD

Standards Council, and the CLD profession who will rely on the new agency qualifications and accreditations to support [workforce development](#) and professional learning pathways. The CLD Standards Council promotes a professional learning culture, setting professional standards for the sector and through our work on professional development and [growing the learning culture](#) in CLD, where practitioners, paid or unpaid, are involved in a continuous process of learning, development and improvement. We look forward to working in close partnership with the new agency, to continue our current developmental work on mapping CLD pathways and driving progress to build the stepping stones between current gaps in SCQF level qualifications.

The proposals for the Bill are considering a revised qualifications body that will include a wider representation and accountability, which is welcomed. It is critical that the new agency establish working groups, forums, partnerships and opportunities to voice opinion and reflect on practices. The agency needs to be a moving entity, always reflecting and reviewing to ensure its offer is current and fit for purpose. It can only do that with stakeholders engaged at all levels.

How best can Scottish Government ensure that the views of all learners are appropriately represented within the new qualifications body, and do these proposals enable this?

As mentioned previously CLD learners should be represented at all levels of the new agency, including strategic boards, forums and working groups across all departments in the new agency. As the proposals currently stand there is little clarity of provision being made for those learners engaged in Community-based adult learning opportunities. If the new qualifications body is to have a key role in ensuring the success of the Scottish Lifelong Learning system it is essential that the views of learners of all ages, at all SCQF stages and in all education settings are represented. Seeking representation from the wide range of learners who undertake accreditations and developing valued engagement further are vital steps to ensure positive engagement and representation is ongoing, current, valid and embedded within the new agency practices of review and development.

Learners with additional support needs, learning difficulties and disabilities should also be at the forefront for leading change. Recognising that not all young people cannot access the qualifications they need to progress in life until they become adult learners, but by then their confidence and motivation has dropped significantly.

How can the new qualifications body ensure qualifications being offered in Scotland are reliable, of a high standard and fit for purpose?

As previously mentioned, the chaotic landscape of ownership of qualifications as well as the current programme of review and renewal of qualifications needs to be looked at. Engagement with sector leads, practitioners who are delivering and learners who are benefitting, is critical for ensuring awards are fit for purpose.

There is a requirement for a universal system of quality assurance, based on both internal and external verification, which applies to all education settings where qualifications are delivered. This system should apply at an institutional/delivery level. Many CLD teams within local authority and the voluntary and charitable organisations have worked hard to build their own SQA accreditation centres, and we would urge the new agency to improve engagement with these centres to assist in ensuring quality assurance, allow more flexibility in delivery and gain the valuable insight these centres can offer to ensure qualifications are reliable, of a high standards and fit for purpose.

Establish links on a local and national level, including businesses and organisations, as well as sectors of industry and learners of all ages. Developing qualifications that reflect the needs of learners to become part

of a stronger and more resilient community and workforce will ensure valid and reliable skills, creating a solid foundation for lifelong learning.

As previously mentioned, the CLD Standards Council is the professional body for CLD Sector in Scotland and the approval body for qualifications for the CLD Sector with three approval routes. This is ensuring the CLD competencies, values and ethics are embedded in the qualifications to develop the professional workforce. The CLD qualifications are across a range of SCQF levels to encourage growth enable multiple routes into CLD, such as NC, PDA, HNC, NPA, SVQ, Degree, PG and Masters. Some levels have a wealth of qualifications and others limited.

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

Having specified legislation regarding working in close strategic partnership with professional bodies, such as the CLD Standards Council, to ensure sector knowledge and expertise is available at all levels of the new qualifications body developmental and decision making processes. One of the key roles of the CLD Standards Council is approvals of qualifications for the CLD sector. This quality assurance is a peer-driven process and covers a wide range of educational programs from initial introduction qualifications such as access and PDAs, through to degree level and above. Professional approval by the CLD Standards Council demonstrates that these CLD learning opportunities are underpinned by the values, principles and our code of ethics, and aligned with the CLD competences. We are continually looking for clearer learning and development pathways for CLD so that learners can clearly see roots in and through the CLD profession, and cohesive naming and recognition of the CLD qualifications at all levels would assist with this. We also are mindful of other comparable programs in the United Kingdom, we work closely with [partners](#) across all four nations.

We would expect to see improved operational procedures including timescales and roles regarding reviewing and renewal of qualifications. For example, currently the ownership of awards and the timing of renewals between agencies for NOS, Modern Apprenticeships and SQA is a messy landscape. They do not take into account of other connected awards or the same award at all levels, often only valuing varying levels by the current uptake and not looking at the sector needs, if the qualification is outdated, lack of promotion or delivery options, and the barriers to uptake which hinder learners to undertake it. There are too many players in the setting up and reviewing, making it very complex easy to “pass the buck” back and forth between agencies and often the sector leads are not engaged with or able to be involved. It is critical this is changed through legislation, operational procedures and understanding of the education delivery across Scotland.

It is vital that the new qualifications agency not only recognises but understands the roles and value of all stakeholders, therefore we request that approaches based on partnership and recognition of the key role played by all educators, not only those delivering school qualifications, is taken, and the board of the new body should be structured to have a wide range of stakeholder representation with no one group having the majority of members. We also believe it to be critical that the new senior management team is also more representative of the totality of the Scottish lifelong educational system. Consideration should also be given to seconding senior staff with current practice, across a full range of educational settings, for a fixed period as a matter of routine to ensure currency of up to date, relevant experience in delivery.

We would encourage greater internal and external communication structures from the new agency, with embedded opportunity for meaningful engagement at all levels. As previously mentioned, this means robust processes for learner and practitioner voices to be heard and captured, to enhance continual improvement of the agency and its work. This will also support the essential aim of continued quality assurance, and must including working groups, adult learning forums, youth forums and community forums. These inclusive approaches from the onset, recognising the broad reach of the accreditation

landscape in Scotland, needs to be seen throughout all levels of the new qualifications agency to ensure its offer reflects the voice of those it serves.

The new qualifications agency could support the development of an Adult Learning Platform. It was suggested that there should be a “GLOW” platform for learners of all ages, or post school leaver age upwards, supporting career and qualification pathways and advice. This would offer an equitable system regards access to accreditations, learning and support.

HM Inspectors of Education:

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 overall purposes set out within the consultation documentation. The role of the HM Inspectorate to provide independent scrutiny of all publicly funded education is a key element in ensuring a high standard of experience for all aged learners, no matter the setting. It is critical that community learning and development is seen as a key part of Scottish Education and welcome inclusion in the range of educational establishments and services that are inspected and supported by HMIE.

We would like further recognition by the inspectors of the key role community learning and development has within other areas within the range of establishments and services listed, through its partnership working and delivery of adult learning, community development and youth work (which also incorporate family learning and ESOL) to support schools, colleges and others.

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 welcomed that CLD is included. The inclusion of CLD, and colleges who often work in CLD settings, is required to provide assurance to Scottish Ministers, Local Authorities, communities and learners on the standard of provision. In addition it is felt that CLD Standards Council approved degree programmes delivered by HE Institutions should also be subject to HM inspection, as is the case for initial teacher training.

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

It is clear that the priorities also include inspection of community based education which is delivered in community settings (including Community-Based Adult Learning, Community Development and Youth Work) as well as in more traditional educational settings.

English for Speakers of other Languages (ESOL) is a growing area of community and college based education, often delivered both non formal and informal, with accreditations, by CLD practitioners. Focused inspection spotlighting ESOL including CLD delivery would offer support with regards to assurance of the quality and understanding the range of provision.

Do you have a view on the options given in for establishing the new approach to inspection?

To take forward legislation which establishes the role of 'HM Chief Inspector of Education for Scotland' in law as an independent office-holder, would benefit the governance and accountability. As an independent office-holder, the HM Chief Inspector would have central responsibility for arranging the schedule, frequency and focus for all inspections. This is an improvement regarding transparency and accountability and is a preferred approach, as opposed to this remaining under the legislative control of Scottish Ministers. Through legislation, it should be stipulated that all educators and learners are required to actively engage in the inspection process, reporting and any follow-up actions. There is a danger that if this is not set out clearly 'other' educators and practitioners will be seen as 'children of a lesser god' and not afforded the appropriate status.

Do you have a view on how governance arrangements for the inspectorate could be developed to better involve providers, including teachers and other practitioners, all learners, pupils and students...

Although inspection is important to provide governance, accountability and quality assurance, the HMIE inspectors also have a vital role in offering a support service to all education and learning establishments. Therefore it is imperative that representation and inclusion are at the core of all HMIE structures and processes, with equality, diversity and inclusion a core part of every inspection. The CLD sector would welcome clearer reporting mechanisms for CLD HMIE to all chief accountable officers, with reports including full inspection details and links to each local authority region's CLD plans.

Developing better working partnerships with key providers and groups is an important aspect to developing good equitable practice, involving all. As with the new qualifications agency, HMIE should have established communications and be encouraged to have stakeholders and learners at the table at all levels of the organisation, from the board to the individual working groups and forums. Equality and inclusion should be embedded in the structure of this organisation, with representatives at all levels to support the opportunity to hear and learn from the voices of the learner and all educators.

Do you have a view or ideas on how to ensure evidence from inspections is being used as fully as possible to drive improvement and inform policy and on who the inspectorate should report to?

It should be a required that all CLD inspection reports are considered by the Education Committee no matter where CLD is housed or the function of the CLD team. As per the CLD Regulations it is the Director of Education/Chief Exec' who is the responsible officer of the local authority where any inspection activity is conducted to ensure that the statutory obligations of that authority are being met.

As previously mentioned, focus and working groups at all levels to inform and support development of the HMIE so it stays fit for purpose. There needs to be support mechanisms for establishments to input and implement improvement and change.

What else do you feel should be included to further recognise, develop and support the delivery of the basic CLD functions, ensure parity of esteem, qualifications and assessments from the CLD sector?

As previously mentioned, clear reference to CLD should be made in the functions and governance structure of the new qualifications body and the revised Inspectorate. Greater engagement from both agencies with partners, stakeholder, learners and communities. This will support the understanding roles, enhance communication and shared information, foster positive collaborative working, as well as increase the whole educational sectors involvement in development with more opportunities to recognise skills and abilities, making both agencies transparent and accessible to all.

It is importance that cultural change within Scottish Education continues, including the new agencies. We expect to see greater parity of esteem, enabling "traditional school based teachers to have a better understanding of the landscape of delivery of qualifications and to feel part of a greater educational workforce", "one which gives value and equity to all professional educators, volunteers and mentors". One that fosters partnership working and realisation of the power of community learning in its greatest sense. This will support industry to meet educational outcomes, and to open a wider range of pathways into professions that enables learners of all ages to gain the skills, knowledge and understanding in a way that suits them. "Getting it right for every learner".

CLD Workforce Recognition: There is a need for a review of CLD legislations to support a fully funded CLD workforce, recognised with a parity of esteem alongside other professional educators, such as teachers. The benefits of this includes how it may ease "pressure on teachers", supports learners to access qualifications at a time of year suitable to their needs and development, and gives a clear message regards life wide learning and benefits of partnership working, enabling development of further learning pathways which are perhaps more suitable and supportive of all Scotland's learners. The diagram below was used in the 2012 Strategic Guidance on CLD for Community Planning Partnerships to illustrate the policy context for

CLD in Scotland. A number of specific policies have been replaced or amended, but it continues to provide a useful picture of the pivotal role of CLD.



Conclusion

We fully welcome the development of these two independent agencies which support education across Scotland. We look forward to working with them both to further develop the systems and structures once the Bill is in place as we feel strongly that the CLD sector as a profession should be reflected as a one of the key stakeholders to support and implement the change required to bring Scottish education into the 21st century.

Fundamental to the practice of CLD across all settings are these values which have been identified by the CLD Standards Council:

- **Self-determination** – respecting the individual and valuing the right of people to make their own choices.
- **Inclusion** – valuing equality of both opportunity and outcome, and challenging discriminatory practice.
- **Empowerment** – increasing the ability of individuals and groups to influence issues that affect them and their communities through individual and/ or collective action.
- **Working collaboratively** – maximising collaborative working relationships in partnerships between the many agencies which contribute to CLD, including collaborative work with participants, learners and communities.
- **Promotion of learning as a lifelong activity** – ensuring that individuals are aware of a range of learning opportunities and are able to access relevant options at any stage of their life.

We welcome the proposed review of CLD as a sector. It is essential that the statutory [CLD regulations](#) are reviewed as part of the review of Scottish Education, and we see a systemic change in [CLD legislation and policy](#) that give CLD (Adult Education, Community Development and Youth Work) protection, safeguarding the current workforce and funding to support the regrowth after 20 years of disinvestment in this sector. We are hopeful that the CLD profession, its practice, practitioners and the voluntary sector will be recognised and specified as key partners in future reports, policy and guidance.