



# **CLD Standards Council Scotland**

Consultation Report

In response to

Post-School Education and Skills Reform: Consultation on  
legislation

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## About Us

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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](mailto:contact@cldstandardscouncil.org.uk)

## Introduction

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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.

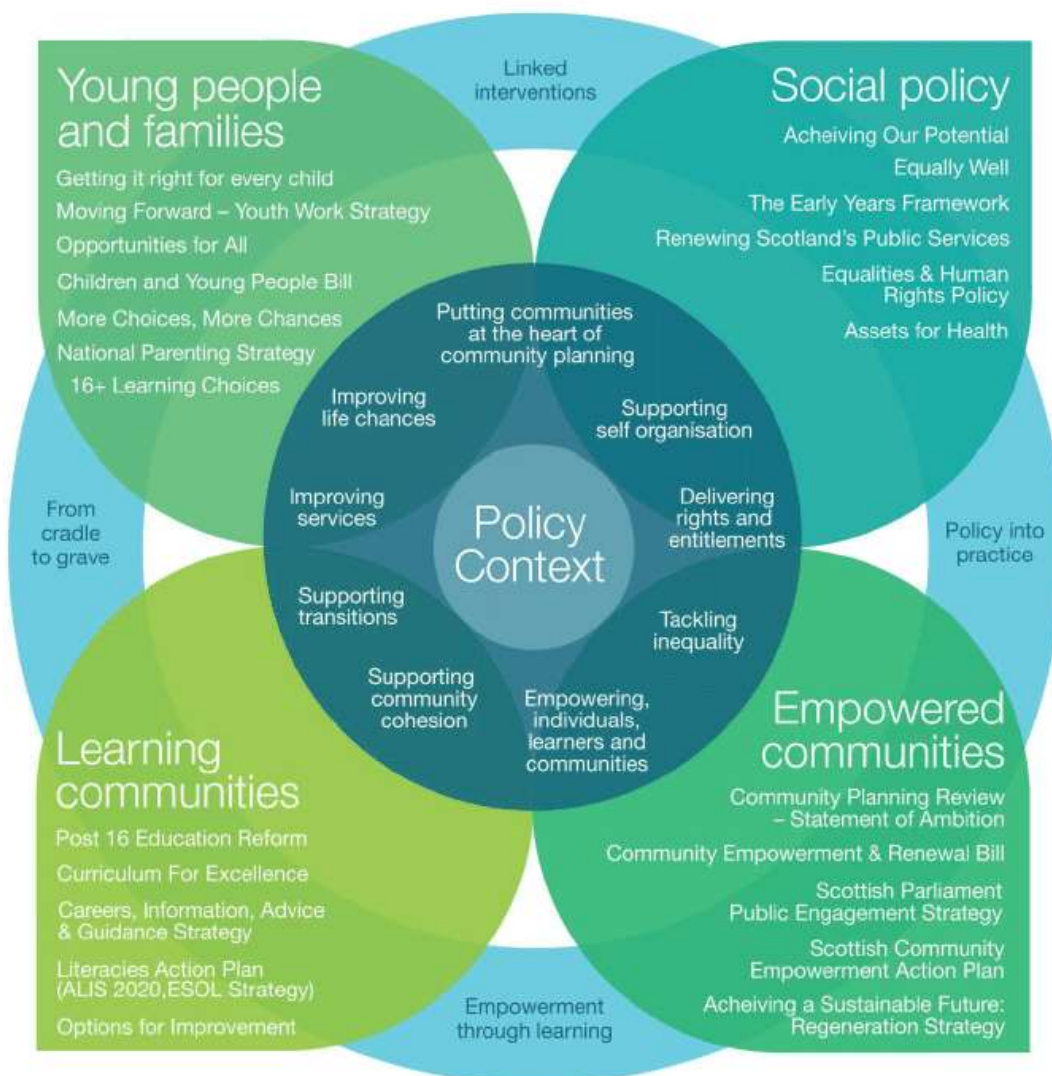
As a field of professional practice, CLD is critical in the achievement of any policy or legislation that requires individual and community engagement, partnership working across educational organisations, and development and learning. It supports the learning, growth and empowerment of individuals and communities, as well as supporting the delivery of other services. CLD practitioners work in partnership with teachers, schools, colleges and universities to support each learner's 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 urban and 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.

CLD offers the learning and development opportunities to ensure individuals can thrive in vibrant communities that are inclusive, empowered, resilient and safe, to tackling poverty by sharing opportunities, wealth and power more equally, working collaboratively to make individual’s needs, goals and aspirations reality, however it is not recognised or acknowledged for its role and this we would like to see changed.

The following diagram 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.



This report provides analysis of the input given through consultation with the CLD Standards Council staff team.



Assumptions:

It is important to recognise that this CLD Standards Council response provides an insight into the views and experiences based on 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 Post-School Education and Skills Reform: Consultation on legislation

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### Proposals

We were pleased to see consideration has been given to the range of issues as outlined in the Withers Review and the Purpose and Principles report, regarding the current arrangements for funding post-school learning and skills training which we also brought to your attention in our response to the consultant on Education Reform Provision of the Bill in December 2023.

We believe that proposal two is the better of the three options as set out in your consultation document. Proposal one, to stay as is, is not an option as changes in funding, structures and delivery support is drastically needed. Proposal three would suggest the Scottish Funding Council (SFC) having a monopoly which would neither be ethically correct nor of any benefit to the post school education and skills sector. Proposal two seems to be the better of the three and would offer transparency and confirmation that SFC would fund modern apprenticeships and SVQs delivered by Scottish Colleges, University and Training Providers (e.g. Sports Academy of Scotland). These qualifications are critical for the CLD sector.

We feel that whilst this is the preferred proposal we have a number of concerns or areas that still need clarification and development such as:

#### Who would be responsible for, and oversee the continued development of, the National Occupational Standards (NOS) in Scotland?

National Occupational Standards (NOS), specify the standards of performance individuals must achieve in the workplace, together with the knowledge and understanding required for roles, for most employment sectors. They are currently managed by Skills Development Scotland (SDS) on behalf of the three devolved administrations and apply to the whole of the United Kingdom. Together with professional standards set by Standard Setting Organisations (SSO), NOS underpin vocational qualifications and are a mandatory factor of Scottish Vocational Qualifications (SVQs) currently accredited by the Scottish Qualifications Authority (SQA) (which is to be replaced by Qualifications Scotland in 2025). NOS also underpin competency standards across the Foundation and Modern Apprenticeship frameworks.

Currently, not only is there a lack of skills sector standards setting bodies, but there is also a significant barrier to enabling standard setting bodies, such as CLD Standards Council, being able to support and develop NOS in their areas of expertise. Currently, CLD Standards Council is unable to lead on the development of NOS however have previously been able to lead on the development of:

- Learning and Development NOS (2021)
- Career Development NOS (2021)
- Adult Learning NOS (2023)
- Youth Work NOS (2019)
- Community Development NOS (2023)
- Family Learning NOS (2023)

As it currently stands, anyone can bid for a NOS development contract if they are on the supplier framework and, whilst considered good practice, there is no criteria supporting the need for sector standards setting bodies to be leading or even part of a working group. This presents a danger that professional associations within those areas of work are at best distanced from the development, if involved at all, as they may not be structurally able to bid for the contract themselves and it is not

mandatory for them to be involved. Professional bodies or professional associations who have the landscape of the sector that they're representing, as well as knowledge on what that workforce is, does and needs, should be pivotal and have mandatory involvement in any NOS development; there is a danger that that knowledge and information held by them will be missed if they are not required to be included. We suggest then that there is critical work to be carried out regarding how NOS development happens, who is involved, and then how that connects into the qualifications impacted by them.

The CLD Standards Council is not a Sector Skills Council. Currently there is no Sector Skills Council that supports the CLD sector in Scotland or the UK, therefore the CLD Standards Council has grown to fill that vacuum where it can, as defined by its current role under [legislation](#). Through setting professional standards for the sector and our work on professional development and [growing the learning culture](#) in CLD, the CLD Standards Council promotes a professional learning culture, 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 SFC, SDS, SAAS and the new agency Qualifications Scotland (QS), to continue our current work on mapping CLD pathways and driving progress to build the stepping stones between current gaps in SCQF level qualifications, and to raise the profile of CLD as a profession.

We believe that there is an opportunity for a paradigm shift in the way these organisations work internally, together and with key stakeholders such as ourselves, to create a cohesive and coherent post school education sector which provides the inclusive Lifelong Learning system required to ensure that no-one or community is left behind. We would also like to strongly emphasise the importance of secure investment and funding for CLD (Adult Learning, Community Development and Youth Work) as a critical sector to support and improve Scotland's economy and the development of thriving communities. An important part of this investment would be the tracking of support to the CLD sector, not just focusing ESOL but adult, young people, family, and community learning, so there is a clear understanding of the sector, along with measurement of activity, including funding and impact, by SFC. Still in her report on the Independent Review of CLD makes recommendations regards funding of CLD, which SFC will play an important role in.

- Project and programme delivery plans for CLD activities have the stability and predictability of funding to allow them to be sure that the medium to longer-term interventions often required in CLD can be delivered.
- That CLD's role within Scotland's overall Lifelong Learning system of education is fully recognised and is reflected in terms of the balance of government spending.

One of the key roles of the CLD Standards Council is approval of qualifications for the CLD sector. This quality assurance is a peer-driven process and covers a wide range of educational programmes 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 [Competent CLD Practitioner Framework](#) which comprises CLD values, principles, code of ethics, and CLD competences. We are continually looking for clearer learning and development pathways for CLD so that learners can clearly see routes in and through the CLD profession; cohesive naming and recognition of the CLD qualifications at all levels would assist with this. We also are mindful of other comparable programmes in the United Kingdom and work closely with [partners](#) across all four nations where the JETS partnership sets and maintains Pan UK and Ireland wide standards.

### Funding

Further clarity is required around the funding of modern apprenticeships, foundation apprenticeships and graduate apprenticeships, and the age ranges they would be made available to. These

apprenticeship opportunities are core to professional pathways for the CLD profession and therefore are required to be accessible and funded for a variety of different aged people at the different SCQF levels. Concerns regarding tiered funding and how this negatively impacts training providers and employers were highlighted, particularly when someone over the age of 25 is reskilling and demographic data for Scotland is showing the growth in number for older age ranges along with the need for reskilling an older workforce. The recent Scottish Government report on the [opportunities and challenges of Scotland's changing population](#) states “We want a Scotland where everybody thrives. .... Many older people will continue to work to support their families and wider communities, which is welcome. We need to address the barriers that may constrain the ability of those people to contribute whilst also ensuring we have a skilled population to provide key public services and to generate the tax income to fund our public services and pensions” (p.22) and the report goes on to make considerable mention of barriers to learning and skills shortages thought the document due to aging demographics and changing economies. [The Employer Skills Survey 2022](#) – Scotland shows that 31% of vacancies were due to skills shortages, and over 25% of employers having 1 or more vacancy at the time of survey.

We would ask for caution and consideration regarding future processes for releasing funding to providers such as the CLD sector, both in local authority and third sector, who deliver a significant amount of skills, learning and accreditations to individuals of all ages. We strongly urge that lessons are learned from the debacle surrounding funding of English for Speakers of Other Languages (ESOL) over recent years. When changed to the model where funding is distributed to ESOL providers within a Community Planning area via a nominated College within the Community Planning Partnership, it has become a bureaucratic mess. Many third sector and local authority training providers report that they decided not to access and draw down ESOL funding through this mechanism, citing it as cumbersome, often with unpractical timescales, an overload paperwork, as well as opening up routes for errors in cross recording of achievements. These local authority and third sector training providers have no option but to use alternative funding sources instead, which is having a negative impact on delivery capacity within the sector, the management of funding and the collation of impact and measurement of achievements. This complicates the gathering of delivery data, social capital, and measurement of impact. In addition, other training and accreditations for young people and adults were cut to enable ESOL to be funded. Members tell us that the decision to not access ESOL funding through colleges is wholly due to the enormity of credit paperwork set by colleges, the unequitable variance of percentages being taken by colleges across Scotland and often “double counting” of delivery and outcomes.

#### Regional and National Funding

In CLD, many providers such as Borders College, Sports Academy of Scotland, and the Glasgow Council of Voluntary Services are key partners and main providers of modern apprenticeships for youth work and community development. Currently many of these are registered to deliver and offer accreditation services across all 32 local authorities. If funding were to move towards a more regional funding model, how would organisations such as Borders College be able to continue to support work they may be required to deliver to Western Isles or Shetland, as they would be working across regional boundaries?

#### Changing Role of SDS

We would like further detail regarding the new role of SDS as anticipated with the changes outlined in proposal two. If the roles and responsibilities regarding training programmes, funding and relevant functions are being taken over by SFC, will the “careers advice” functions return to local authority governance or become a separate entity? How will SDS ensure that the careers advice service is fully accessible to the post school learner at all ages and stages of their life?



### Clarity and use of Language

Throughout conversations and documentation relating to any Post-School Education and Skills Reform we are noting a significant use of language depicting references to young people, alluding to it being more focused on younger aged people who may engage with post school education and skills services. We also feel that using “post school” language is limiting and restricting engagement considerably. Our lives are not normally divided up as being at school/not at school, school/post school. Many of our CLD learners will be accessing skills development learning opportunities with school far behind them, therefore not classing themselves in the “post school” bracket.

As frequently referenced throughout the recent the report from Independent Review of Community Learning and Development (CLD) by Kate Still, [Learning; For All. For Life.](#) Scotland’s population is aging. There are more people in older age ranges than ever before in Scotland who are engaging with learning and skills development with CLD to support changing communities and economies. We would strongly ask for clarity of “Post School” being anyone above school age. This, along with clear guidance for this and future documentation, on post-school supporting [Education and Lifelong Learning](#), would promote the fact that post-school is life-long, life-wide learning and skills development. It would also link to the [Adult Learning Strategy 2022-2027](#).

### Individual Learning Accounts (ILAs)

We would request that the ILA funding and support be reinstated and developed to support older learners, thereby contributing to reversing the decline in adult learning and volunteering. Many adults across Scotland who are needing to re-enter the employment market, change career or reskill are struggling to access learning opportunities due to lack of funds. AONTAS, The National Adult Learning Organisation in Ireland recently [reported](#) that 1 in 3 adults accessing adult education reported needing more financial support. Having an individual learning account, where individuals can access one off, or staged payments to obtain qualifications up to a set SCQF level, would make it easier for young people and adults to study more flexibly, have equitable access to learning opportunities at a time in their life that is more suitable to them and their lifestyles and needs. The European Union states in a [2023 article](#) by the Adult Learning Working [Group](#) that these accounts should be “*designed for all adults of working age, whether they are employed, unemployed, self-employed, or economically inactive. Member States can tailor the implementation to meet their specific needs.*” and offers case studies from countries depicting the benefits to their economy, breaking down barriers to accessing learning, and promoting lifelong learning to all.

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’* (p.4).”

## **Governance of the Scottish Funding Council**

### Board Members

We do not agree with the suggestion of amendments to the 2005 Act to remove restrictions in respect of Board appointments and the four-year limit regarding terms of standing. Currently governance of the board allows for members to do an initial four-year term, with a second four-year term should it be deemed suitable, which we feel is more than enough for individuals to be in these positions. We would suggest seeking further clarity and research into other public bodies to look at offering consistency in line with them.

In the recent the report from Independent Review of Community Learning and Development (CLD) by Kate Still, [Learning; For All. For Life.](#) there is a recommendation for “5.1: *The Scottish Government should appoint a Chief Adviser on Community Learning & Development: To undertake a similar role to the Chief Social Work Adviser i.e. advising Ministers and policy teams with an interest in, or responsibility for, aspects of CLD services and practice*” (p.38). Should this recommendation be taken up then this Chief Advisor on CLD would play a pivotal role in supporting the new board, as they would bring a deep understanding of community based learning and an up to date overview of the sector needs from both a strategic and leadership lens, offering a holistic CLD approach encapsulating Adult Learning, Community Development and Youth Work.

The consultation document states, “*An important part of this would be ensuring that SFC board membership had an appropriate understanding of the range of apprenticeship provision.*” and we respectfully suggest that this should already be the case. If not, we would advise a full review of governance to include how to ensure professional bodies and skills sector leads are mandatorily involved in the organisation, as a board member or with an advisory role to the board through sector working groups or sub committees for sectors. We feel this is critical, especially in regard to apprenticeships where employer voice may be strong for their requirements and needs, but may not always include the professional standards, values and ethics, or an understanding of important connections regarding public good, social justice and what society needs. It is also important in relation to sector voice e.g. where the Private sector has a negligible to small presence and the Public and Third sector provide the vast majority of the workforce.

We were delighted to read “*We are interested in your suggestions for skills, knowledge, experience needed for the board to be effective in holding SFC to account and scrutinising its performance...*” We would recommend that all board appointees are required to complete the College Development Network (CDN) [board training](#) as this would be critical in fully enabling the best practice regarding supporting all school, college, university, CLD and training provider funding, as well as the development and delivery aspects of SFC. Recognition should be given to HMIE and their frameworks, specifically to the ‘[How good is our community learning & development v4?](#)’ for the CLD sector. In the Independent Review of Community Learning and Development (CLD), [Learning; For All. For Life.](#) the view is that these inspections are underutilised regarding being a resource of information for the sector, best practice, and improvement. The report recommends that Scottish Government and CoSLA should establish a joint CLD Strategic Leadership Group (SLG) including an Equalities Forum. This is something SFC should be part of. It also recommends “*Consideration of HMIE CLD inspection report findings should be a standing item on the Strategic Leadership Group agenda*”(p.39).

### Learner Voice

We were unclear as to where learner voice and individual participation is within the current structures of SFC, especially in connection to the board and sub committees. There seems to be no mention of learner participation or the value of learner’s voice in this consultation or supporting documents. We would like clarification as well as confirmation that post school learner voice of all ages is not only a valued and integral part to this consultation and to the development of the three bodies, but how it is a fundamental part of the structural processes and procedures of SFS, SDS and SAAS moving forward.

We feel strongly that seeking representation and further developing valued engagement from the wide range of learners who undertake accreditations are vital steps to ensure positive engagement and representation is ongoing, current, valid, and embedded within all of the new agency practices currently under review for the Post School element of education reform. Learners with additional support needs, learning difficulties and disabilities should also be at the forefront for leading change. It should be recognised that not all young people can access the qualifications they need to progress in life until they become adult learners, but by then their confidence and motivation has dropped

significantly. We would expect guidance and legislation from this consultation to recognise and compliment all other legislation and reforms undergoing review at the moment such as [Learning Disabilities, Autism and Neurodivergence Bill](#).

## Enhanced Functions for the Scottish Funding Council

### ESOL

As previously mentioned, across Scotland there are different regional approaches to how ESOL is funded. For CLD providers to get ESOL funding from colleges, community-based adult learning providers have to ensure everyone is enrolled as a college learner and often local authorities CLD services who are one of the main providers drawing down relevant credits.

The negative impact of this system is that it is primarily about hours of learning or presentation of qualifications and achievement, to draw down the credits. ESOL through the lens of CLD is much more than this; it is about inclusion, reducing isolation, citizenship, social justice. It supports the six overarching [key outcomes](#) as set out in the [New Scots Refugee Integration Strategy](#) 2024 to highlight the importance of integration and acceptance. Often these life changing and critical aspects of ESOL support and learning offered through community-based provision are at best misunderstood, and at worst dismissed or not regarded as significant.

We strongly request the need for a full review of adult learning courses through colleges, what credits are worth and how community-based adult learning, including ESOL, is funded. Currently each College sets its own partnership agreement with whoever is delivering ESOL in their region. This includes agreement on their percentage take from all drawn down credit funding. All take differing amounts, with some instances of colleges taking a significant portion of the money for no delivery of the learning.

There needs to be set criteria across Scotland; a credit is worth a credit regardless of educational institution or geographic setting. There should be a nationally agreed admin fee/percentage for the college to take. Currently, the system is putting smaller providers like the WEA and ESOL Scotland (Glasgow ESOL Forum) into financial difficulty.

### Recognition of Prior Learning

There needs to be greater flexibility within the current systems to allow for recognition for learning activities, for learners of all ages, that might not be recognised by an accreditation, but would feed into and impact the [CLD Managers Scotland](#) (CLDMS) [Key Performance Indicators](#) (KPIs), YouthLink Scotland's [Youth Work Outcomes](#) as well as the recommended new national CLD outcomes in the Independent Review of Community Learning and Development (CLD), [Learning; For All. For Life](#). *"Recommendation 6.2: Existing outcome measures, including the Youth Work National Outcomes and Skills Framework and the CLD Managers Scotland KPI data, should be used as the basis to develop a shared CLD Outcomes and Measurement Framework for use across the sector: This will require consideration of what data needs to be consistently gathered to show progress on delivering outcomes"* (p.39). This is further evidence in the report by *"Some learners noted how it can be difficult for them to be aware of learning opportunities, or for their prior learning to be fully recognised."* (p.25)

As well as SFS, SDS and SAAS, 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](#).

### Reporting

It would be beneficial if moving forward, the SFC with its new roles and responsibilities were able to report more transparently regarding who is being funded and how. We would benefit as a sector from knowing what CLD organisations and qualifications are funded, with an overview of CLD as well as breakdowns into its three thematic areas which are adult learning, community development and youth work. We strongly feel that this information is collated under CLD as a sector and then sub-referenced into thematic areas to support the raising of the CLD sector profile and unifying the three thematic areas, as called for in the Independent Review of Community Learning and Development (CLD), [Learning; For All. For Life](#). *“Whilst each component part of CLD: Youth Work, Adult Education/ESOL and Community Development come from different historical origins and have specialist knowledge and skills, there is a unifying CLD ethos of core values, ethics, underlying principles, and “approach” (p. 6).*

## Conclusion

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We look forward to working with SFC, SDS, SAAS, QS and SCQF to further develop the systems and structures 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 21<sup>st</sup> 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 welcomed the recent review of CLD as a sector and its report, as mentioned previously. It is a fundamental requirement that the statutory [CLD regulations](#) are critically 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.