

Empowering Schools: a consultation on the provisions of the Education (Scotland) Bill

Response from the CLD Standards Council Scotland

Submitted 30 January 2018

Introduction

This response sets out the views of the Community Learning and Development Standards Council Scotland (CLD Standards Council) in respect of the Scottish Government's document "Empowering Schools: A Consultation on the Provisions of the Education (Scotland) Bill", issued in November 2017. It has been produced as a result of extensive professional discussions with approximately 500 CLD practitioners across Scotland. Further information and analysis of our consultation process can be found at <http://cldstandardscouncil.org.uk/the-standards-council/governance-review-of-scottish-education/>

Education does not take place only in schools; nor do children and young people learn in schools in isolation from the education that happens elsewhere, involving them, their families and the communities they live in. A recognition of this should be an essential starting point for education reform, to which CLD practitioners can make a major contribution.

CLD is not an allied educational practice. In Scotland, CLD is a distinct profession bound in statute and policy, delivered by a graduate trained workforce and founded on professional competences and clear code of ethics. CLD cannot be split into its constituent parts of youth work, adult learning, adult literacies, family learning, home school link, ESOL or community development. Every local authority in Scotland must secure and co-ordinate the provision of CLD activities (The Requirements for Community Learning and Development (Scotland) Regulations 2013: <http://www.legislation.gov.uk/ssi/2013/175/introduction/made>). HMIE reports consistently rate and recognise the powerful impact of CLD provided by a range of agencies mainly across the public and third sector: https://education.gov.scot/Documents/QuISE_2012-2016_COMPLETE_bookmarks.pdf The OECD report of 2015 identifies and recognises the unique contribution that CLD makes to Scottish Education and its clear role and contribution to closing the poverty related attainment gap <http://www.oecd.org/education/school/Improving-Schools-in-Scotland-An-OECD-Perspective.pdf>

This response is firmly predicated on the principles of lifelong learning and social justice and the understanding that 80% of learning happens outside the school context.

The CLD Standards Council is the only organisation that has data drawn from the entire CLD sector.. Therefore, this response is inclusive and not specific to one particular strand of practice or specific group of practitioners. Members with remits

and responsibilities in the following domains in which CLD is active were also included:

- Arts & Creativity
- Health, Wellbeing & Justice
- Finance & Community Planning
- Leadership & Management
- Inclusion & Equality
- Policy, Performance and Improvement
- Academic Research at all levels

The CLD Standards Council is a growing organisation and its Executive Committee and Council members comprise academics from the HE and FE sectors, chief executives and senior leaders across the third and public sector provision in Scotland as well as direct CLD practitioners themselves. CLD Standards Council members have extensive experience and knowledge of delivering learning opportunities with and for learners and communities and also supporting and advising educational leaders in areas of CLD policy, strategy, practice and professional learning. The CLD Standards Council offers their active participation as a key resource for reform.

It is important to stress that the response of the CLD Standards Council has not been influenced or instructed by any other agency, pressure group or trade union.

Section 1: Headteachers' Charter

Question 1

The Headteachers' Charter will empower headteachers as the leaders of learning and teaching and as the lead decision maker in how the curriculum is designed and provided in their schools. What further improvements would you suggest to enable headteachers to fulfil this empowered role?

The titles of both the Scottish Government's Governance Review paper and the *Education Governance: Next Steps* proposals (June 2017) referred to empowering not only teachers, but also parents and communities' The consultation on provisions of the Education Bill is entitled *Empowering Schools* and whilst it gives some attention to parental and community engagement, and to pupil participation, this is made very much secondary to the intention to "empower our schools and school leaders", as stated in the first sentence of the introduction.

As a result, the focus of the proposals is on empowering "headteachers as the leaders of learning and teaching and as the lead decision maker in how the curriculum is designed and provided in their schools", missing the opportunity to consider where else learning takes place in communities and how headteachers can best liaise and co-operate with other "leaders of learning", other than in the context of how others can support schools to achieve "their" aims.

The *Next Steps* paper states (2.3.2, p. 19) that “Learning does not stop at the school gate.” It refers to the role of communities, businesses and others in giving children a “holistic learning experience”. This is entirely in line with the focus and ambitions of Curriculum for Excellence; the governance review offers an opportunity to build on these ambitions, as advocated by the OECD in their *Improving schools in Scotland* report:

“A major challenge is how to stay bold and to build on what has already been accomplished in a way that is as persuasive to the public as it is to the profession, and that can achieve greater equity for all pupils sooner than later. ...It means going to the full conclusion of a curriculum that is to be built by teachers, schools and communities, alongside a strengthened “middle” and clear system leadership;”

Unfortunately the proposals for the Bill at this stage do not appear to reflect the same broad vision.

The OECD was also clear that it favoured enhancing the “collective autonomy” of schools, “working together under district (LA) control, and of districts working together within the wider system, to generate and drive change”. It did not favour “giving greater freedom to individual school communities and head teachers untrammelled by engagement with others”. Again, the proposals for the Bill do not appear to be informed by this insight.

Reference is made to the local community acting as ‘critical friends’ to headteachers. Most local communities will need support to provide this ‘professional challenge’, and CLD professionals have the skills and experience to provide this. At the same time, it is important that a clear distinction is made between the potentially valuable role of the “supportive networks” referred to and the need for accountability through well-defined line management arrangements.

The CLD Standards Council fully agrees that schools “make a major difference” (*Next Steps*, 3.3.3, p. 29) and that headteachers have a key leadership role. Headteachers would be significantly empowered in terms of their ability to bring about positive change by being able to form and work in equal partnerships with others. To achieve this genuine empowerment, far greater emphasis is needed on developing learning communities in which schools play a key role alongside others, rather than simply on the “school community” and how others can support it; and on support to work with schools and their partners in other areas.

Question 2

The Headteachers’ Charter will empower headteachers to develop their school improvement plans collaboratively with their school community. What improvements could be made to this approach?

The approach could be improved by a greatly increased emphasis on developing school improvement plans in the context of the CLD Statutory Guidance and the wider local learning community, and of the community planning partnerships and other collaboratives that support these.

Question 3

The Charter will set out the primacy of the school improvement plan. What are the advantages and disadvantages of this approach?

It seems likely that there are advantages in the school improvement plan being recognised as the over-arching statement of objectives for learning in the school. Although it is not clear that this requires reinforcement through the Charter. Strengthening focus on improvement requires the identification of what needs to be improved and how this will be achieved, and may make it safe to acknowledge that there is room for improvement.

If “primacy” is set out or interpreted in a way that implies that the plan can or should be developed in isolation from other relevant local plans, or without benefiting from the experience of schools and their partners in other areas, this would be a clear disadvantage. There is a risk of losing sight of prevention measures, particularly if they are to be addressed beyond the school gates. For example, family learning and literacies need to be seen as fundamental to improving literacy and closing the attainment gap rather than as an ‘add on’.

To be useful, plans need to account for process and be evidence-based both in terms of identifying the focus for improvement and the improvement measures to be adopted. Issues relating to practice and culture seem unlikely to be addressed through legislation.

CLD happens across the catchment areas of schools, and brings together children and young people living in the same area but attending different schools. Steps should be taken to ensure these measures consider wider community issues and do not serve to enhance any existing neighbourhood divisions or issues.

Question 4

The Headteachers’ Charter will set out the freedoms which headteachers should have in relation to staffing decisions.

a. What are the advantages and disadvantages of headteachers being able to have greater input into recruitment exercises and processes adopted by their local authority?

b. What are the advantages and disadvantages of headteachers’ ability to choose their teams and decide on the promoted post structure within their schools?

Headteachers having greater input into recruitment decisions has the important advantage of allowing them to select staff whom they feel to be most in tune with the ethos of their school. At the same time, there is a need for checks and balances, for example in order to prevent unintended consequences such as increasing the inequality of attainment as a result of schools in more affluent areas attracting and securing more skilled and experienced teachers.

Should these proposals be implemented, headteachers should be mindful that partner organisations with a legitimate interest in school recruitment and post structures, may not be afforded the same autonomy, which could impact progress and timescale .

The CLD Standards Council would be concerned if the Charter, for example:

- Enabled an extension of Headteachers' authority over recruitment and other staffing decisions in relation to CLD practitioners or other professional groupings of whose roles they may have limited knowledge or professional and practice experience.
- Extended the authority of Headteachers in designating eligibility for non-teaching posts.

Question 5

Should Headteachers be able to decide how the funding allocated to their schools for the delivery of school education is spent? If so, what is the best way of doing this?

If headteachers wish to make changes to how the funding allocated to their school is spent, they should be required to provide an evidence base for the changes to be introduced and indicate how they will identify and measure the improved outcomes secured. This should be done in line with appropriate and transparent governance procedures.

If funding allocated to schools is extended to include aspects of education beyond classroom education and/or involving professionals other than teachers (as for example through the Pupil Equity Fund) it is essential to ensure that this does not compromise the effective deployment of the professionals concerned, such as CLD practitioners, which needs to take account of factors other than the priorities of individual schools, including in particular the spending priorities of wider neighbourhood plans relating to the communities that the schools serve.

Question 6

How could local authorities increase transparency and best involve headteachers and school communities in education spending decisions?

One approach could be to ensure the budget allocation follows each young person, regardless of the learning context. Local authorities can best involve the wider school

community in education spending decisions through deploying CLD community development workers to engage communities, helping them to understand funding constraints and opportunities, and the range of options available. They should make use of existing structures and processes, in particular those developed for community planning and through support for community empowerment to increase transparency and involve headteachers and school communities in education spending decisions. This will enable decisions over spending on school education to be set in the context of spending on education in a wider sense and of other relevant public services. It will also help to avoid duplication of participative processes.

Question 7

What types of support and professional learning would be valuable to headteachers in preparing to take up the new powers and duties to be set out in the Headteachers' Charter?

The imperative to secure improvement underpins the Headteachers' Charter. Professional learning which focuses on ensuring that there is an evidence base for their improvement actions and the improved outcomes secured will support Headteachers to enhance their knowledge and skills in this area.

Working collaboratively with parents and other professions is also a fundamental element of the Charter. In this respect the school, in the context of the wider school community, can be seen as an organisation and Headteachers may benefit from professional learning around organisational development including concepts like 'organisational health' and 'organisational culture'.

Support and professional learning relating to partnership working, lifelong learning, community empowerment, co-production, the application of the Standards for Community Engagement, parental engagement, family learning, pupil participation and the roles of CLD practitioners will be essential for Headteachers in the context of new powers and duties, as will finance, governance and other skills and practices similar to those required of directors or CEOs of small/medium-sized enterprises.

Section 2: Parental and community engagement

Question 8

Are the broad areas for reform to the Scottish Schools (Parental Involvement) Act 2006 correct?

Empowering Schools starts its consideration of "parental and community engagement" with the very positive recognition that "parents are the main educators in their children's lives, particularly in the very early years." However there is no reference at this point or later in this section of the proposals to the role of communities. There is a need for distinction between parental involvement and

parental engagement; they are not interchangeable. As in relation to the Headteachers' Charter, there is a risk that key opportunities are missed in the absence of a more comprehensive approach to reform.

The proposals recognise (p. 19) current evidence indicating that “it is parental engagement in learning outside of school which offers the greatest potential to impact attainment and long term outcomes for children”. This is welcome, as is the proposal to update the legal definition of parental involvement to ensure that it is sufficiently broad to cover all aspects of parental involvement and engagement; although it is difficult to see how legislation will have a major impact in relation to this.

The change from a duty to inform and consult to one of collaboration is welcomed. The CLD sector's experience of working with parents in their communities indicates that it is essential that this is defined in a way that empowers parents and leads to planning and decision making around school policies, curriculum design and school improvement being undertaken with parents regarded as equal partners throughout. The concept of co-production would be a useful approach in this context. The National Standards for Community Engagement provide a framework for collaboration that should be used consistently to ensure that collaboration is adapted to local issues and circumstances while following tried and tested principles for productive engagement.

A major omission from the proposals is the lack of consideration of the influences on “parents” before their children engage with formal education and indeed before they become parents. Given that parental engagement or non-engagement is strongly linked to wider factors of poverty and exclusion, it is clear that choices on whether or not to engage *as parents* are strongly influenced by life experience as a whole.

This points to the essential link between closing the attainment gap in education and combating poverty, exclusion and inequality. More specifically, it indicates in the most direct way the need for the governance review and the Education Bill to include consideration of engagement with the wider community, enabling those who are least likely to participate with the formal education system to get involved with learning and the development of learning communities.

Major asset in this context are the existence of the Standards for Community Engagement, the Adult Learning Statement of Ambition and the CLD Standards Council. The CLD Standards Council is a professional grouping with competences designed to address and support parental and community engagement.. CLD as practised in Scotland is unique and as such provides a distinctive advantage in achieving the aims of the governance review. By bringing together youth work, adult learning and community development, CLD enables a holistic approach to strengthening the capacity of communities to address issues of concern to them (including those relating to educational opportunities and achievement), supporting lifelong learning, and widening opportunities for young people and adults to attain and achieve in a variety of settings.

The CLD sector has developed skills and standards in terms of engaging those who do not traditionally participate. It cannot be assumed that the requirement on headteachers to secure 'genuine and strong partnerships with all parents' will be achievable without mobilising the expertise that will assist them to do this. As stated on p19 'evidence shows that it is parental engagement in learning outside of school which offers the greatest potential to impact attainment and long term outcomes for children'. Placing this expectation on headteachers will in itself achieve nothing; the critical factors are identifying and ensuring the availability of the competences required to put it into practice.

The proposed revisions to statutory guidance on parental involvement should include provisions to ensure linkage between the reviews of parental involvement strategies and the CLD planning process that takes place under the provisions of the Requirements for CLD Regulations. This would provide a means of supporting greater integration of parental and wider community engagement. Consideration should also be given to strengthening the statutory basis of CLD through the provisions of the Bill.

The consultation paper includes proposals for "wider activity" to complement legislative changes. This is welcome in that positive change will depend largely on changes in practice and culture. The proposed development of a national action plan on parental engagement and family learning should involve the relevant CLD bodies such as CLD Standards Council, CLD Managers Scotland, Learning Link Scotland and Scotland's Learning Partnership and BEMIS. Further consideration should be given to the proposal to introduce "a home to school link work in every school": development needs to take account of current home/school link practice (often undertaken by CLD professionals); of the varying needs of schools and their catchment areas (some areas may need significantly more support than others); and of the practice models and support and management arrangements that are likely to be most effective.

Question 9

How should the Scottish Schools (Parental Involvement) Act 2006 be enhanced to ensure meaningful consultation by headteachers with parents on substantive matters of school policy, improvement planning and curricula design?

Whilst the direction of proposals to strengthen duties on Headteachers to work collaboratively with their Parent Councils, and to introduce duties to communicate with the wider parent forum, is welcome, the proposed duties seem likely to be ones that are fairly easy to meet in formal terms without substantive change occurring;(a "tick-box approach"). Given the issues identified in the response to Question 8 that are not addressed by the proposals, there is a risk of the introduction of these duties resulting in attention being focused on meeting them,with little to show in the way of outcomes and diverted away from more productive activity.

If legislation is to be used to seek improvement in parental engagement and involvement, the CLD Standards Council recommends consideration of the following areas:

- A requirement that reviews of strategies for individual schools should include consideration of the extent to which parents have been engaged in the design and delivery of the strategy and in identifying the criteria for success.
- Defining parental involvement more holistically and in a way that places it in the context of learning/neighbourhood communities. This would help ensure that the good relationships forged in the early years are built upon in the school setting. This approach also acknowledges that parents are interested in and often take a community wide approach. Many will have children at different stages of the education system in their locality,
- An expectation that parental involvement activities should meet the Standards of Community Engagement. The CLD sector is well-placed to help meet the 'support standard'.

Question 10

Should the duties and powers in relation to parental involvement apply to publicly funded early learning and childcare settings?

The CLD Standards Council believes that parental involvement in publicly funded early learning and childcare settings should be supported. If the learning community approach advocated in responses to previous questions were adopted, it would naturally encompass early learning and childcare establishments.

Section 3: Pupil Participation

Question 11

Should the Bill include a requirement that all schools in Scotland pursue the principles of pupil participation set out in Chapter 3? Should this be included in the Headteachers' Charter?

The CLD Standards Council welcomes the focus on pupil participation within the proposals for the Bill. As with other aspects, the proposals should be widened beyond exclusive attention to learning and participation within schools and should include relevant agencies such as CLD Standards Council, CLD Managers Scotland, YouthLink Scotland, Youth Scotland, LGBT Scotland and BEMIS. The outcomes in the National Youth Work Strategy should also be taken account of.

The proposals refer to the findings of the study carried out in 2015 by Scotland's Commissioner for Children and Young People (SCCYP), *How young people's participation in school supports achievement and attainment*. The study, which involved young people in 7 secondary schools in more deprived areas that had been

identified as having higher than expected exam results, highlighted their view that “relations among pupils, teachers and their communities¹ needed to involve power-sharing”; and that one of the key areas for improvement was “in the way schools were linking with their communities through participation”.

The study also found that whilst in these schools pupils had substantial opportunities for meaningful participation, the young people saw their opportunities for participation as limited. Alongside “enhancing dialogue, power-sharing and decision making about how the school is run and what schooling is for”, SCCYP identified the need to develop “schools’ links with local, national, and international communities” as one of the key implications of the study.

The CLD Standards Council believes that these findings of the study referred to in the *Empowering Schools* paper indicate features that should be included in the proposals. Rather than focusing on participation by pupils solely within a school context, what is needed as a basis for real and positive change is consideration of participation by young people in both school and community contexts, and of the linkages between this and wider community engagement. Proposals should be based on an understanding that real and substantive change is needed.

Empowering Schools states (p.22, “What we propose to do”, first paragraph) that “Teachers and school leaders are distinctively positioned to enable...young people to understand and exercise their rights...and help them contribute in all kinds of decision-making”. This statement needs closer examination. Teachers and school leaders certainly have an important part to play in these areas, but at the same time it should be recognised that their role, and the perception of it by young people, is likely to place some limitations on this. CLD professionals have a specific skill-set and job roles that are directly relevant to enabling young people to exercise their rights and participate in decision-making.

In that context:

- Legislative duties and requirements included in the Bill should refer to participation by young people both as pupils in school and in other contexts.
- Consideration should be given to the CLD outcomes within the National Youth Work Strategy and the key role of CLD practitioners in developing young people’s participation, as pupils in school as well as in other contexts. The Headteachers’ Charter, for example, should make reference to this, perhaps in the form of a requirement on Headteachers to ensure that the need for input by CLD practitioners in support of young people’s participation in the school is identified.
- There should be provision in legislation to ensure linkage between the planning and development of young peoples’ participation in schools and other contexts and CLD planning.

¹ Emphasis added.

Any requirement in the bill or the headteachers' charter should be accessible and meaningful to young people themselves.

Question 12

What are your thoughts on the proposal to create a general duty to support pupil participation, rather than specific duties to create Pupil Councils, committees etc...?

The CLD Standards Council would not support the creation of duties prescribing specific arrangements for participation by young people. However it would be against the spirit of participation for decisions on approaches to and structure for participation to rest with the headteacher alone. Young people themselves should have a say in how their voices will be heard in their school. Participation should be voluntary and start with the young people with learning outcomes being negotiated and agreed.

Section 4: Regional Improvement Collaboratives

Question 13

Should the Bill include provisions requiring each local authority to collaborate with partner councils and with Education Scotland in a Regional Improvement Collaborative?

Improving Schools in Scotland: an OECD perspective urged

“Less emphasis on “running” CfE as implementation and consensus- building at the system level towards professional leadership focused directly on the nature of teaching, learning and the curriculum in schools, networks and communities.”

And stated:

“We believe in reinforcing the ‘middle’, through fostering the mutual support and learning across LAs, together with schools and networks of schools.”

It supported a “strong central steering and enabling role”, providing an overall framework in which the networks function. This sets out a potentially powerful model; it is important that the Regional Improvement Collaboratives (RICs) develop in this way and it is not clear that the emphasis on legislation and requirements supports this. Collaboration is more about culture and practice that is founded in shared ethics and values.

As noted in response to Question 1, the OECD was also clear that it favoured enhancing the “collective autonomy” of schools, “working together under district (LA) control, and of districts working together within the wider system, to generate and drive change”; and that it did not favour “giving greater freedom to individual school

communities and head teachers untrammelled by engagement with others". The proposals for the Headteachers Charter in section 1 of *Empowering Schools* do not reflect the approach that the OECD argued for, and as a result seem unlikely to support the effective collaboration the RICs are intended to develop.

As with other aspects of the proposals, there is a need to widen the span of attention beyond schools and teachers. The first paragraph of section 4 does refer to bringing together "a range of professionals", but in the context of a "relentless focus on supporting teachers and other school staff". In seeking a shared commitment to work "with children and young people to improve their well-being, attainment and outcomes" the proposals are on strong ground, but this is undermined by the emphasis on "supporting" one group of staff in one setting rather than on children and young people themselves. It is important that there is a clear definition of who is included when referring to other professionals.

The OECD repeatedly highlights the role of communities in implementing Curriculum for Excellence and improving educational outcomes, for example arguing that:

"Having implemented CfE at the system level, the centre of gravity needs to shift towards schools, communities, networks of schools, and local authorities in a framework of professional leadership and collective responsibility."

Reflecting this perspective in the development of the RICs will be an important factor in them achieving the impact required. Fundamental to the role of the RICS should be tackling the poverty related attainment gap, and they must have a focus wider than schools if they are to be successful, for example through support for the development of health and well-being activities outwith the school day, or strengthening the links between planning for educational improvement and community planning. As in relation to parental and community engagement, the existence of CLD as an established professional grouping provides the means to embed support for lifelong learning and the growth of learning communities in the work of the RICs, and consideration should be given to ensuring that the role of CLD practitioners in doing this is supported. The RICs should liaise, communicate and partner with the 5 existing CLD regional networks, which are supported by the CLD Standards Council and exemplify the value of working in the way advocated by the OECD.

In the longer term, the RICs could provide the basis for building wider alliances in support of educational improvement. The *Education Governance: Next Steps* proposals referenced a study of cross-sector collaboration to improve education in the USA, *Putting Collective Impact in Context*. This highlights, for example, the benefits for sustained improvement of "embedding reform support in a broad and lasting coalition", contrasting this with the limitations of "shallow and ephemeral reform". The type of approach indicated would be strongly supported by existing work in relation to community empowerment and community planning; the basis for it needs to be established by ensuring that the focus of the RICs is not narrowly and exclusively on schools.

Question 14

Should the Bill require each Regional Improvement Collaborative to maintain and to publish annually its Regional Improvement Plan?

There should be requirements to ensure that the activities of RICs are transparent, accountable and that they have visible and upfront CLD representation and have specific CLD related workstreams.

Question 15

If we require Regional Improvement Collaboratives to report on their achievements (replacing individual local authority reports), should they be required to report annually? Would less frequent reporting (e.g. every two years) be a more practical and effective approach?

Less frequent reporting seems likely to be a more practical and effective approach and allows for the development of processes and professional relationships.

Question 16

In making changes to the existing planning and reporting cycle, should we consider reducing the frequency of national improvement planning and the requirement on Ministers to review the National Improvement Framework?

No comment.

Section 5: Education Workforce Council for Scotland

Question 17

Are the proposed purpose and aims of the Education Workforce Council for Scotland appropriate?

The CLD Standards Council believes that the proposals for a new Education Workforce Council must be considered in the context of a broad, forward-looking vision of the role and purpose of education. Curriculum for Excellence provides the basis for this by understanding education as being about the development of the whole person, which by definition happens across the entire life course. For Curriculum for Excellence to bear fruit, that wider vision of lifelong, life-wide learning needs to be put consistently into practice, including across all the provisions of the Education Bill and in particular in the development of the support for and regulation of the wider education workforce.

Practising education as a lifelong, life-wide journey requires us to understand schools as a part of their communities. Rather than thinking of communities in the role of serving their schools, we need to focus on the development of learning

communities and a learning society in which schools play an integral part alongside partners: practitioners who enable children and young people to learn and develop in other settings, adults to develop their capacities, parents to support their children's learning and communities to organise themselves for learning and change; and including communities themselves in a central role.

The Scottish Government has embraced community empowerment and the Christie Commission's insistence that communities, and people who use services, must be partners in addressing issues and in positive change. These same principles apply to education as much as to other public services and it is essential that reform of education governance reflects and is linked to other aspects of public service reform. Recognition is required that individuals and communities need support from a range of professionals. This will become increasingly important as we address societal issues associated with an aging demographic.. The change required is about system change rather than simply modification of existing practice.

This means that we must think of a comprehensive, systematic programme of community learning and development, which enhances the capacities of communities as partners. This must link learning to action for change as being an essential, core part of "the education system" and not as an auxiliary to schools or an afterthought.

Despite the positive policy context outlined, achieving a significant shift towards an education system focused on lifelong, life-wide learning requires a major and sustained effort. In that context, the CLD Standards Council believes that it is essential that the CLD profession maintains and strengthens a clear and distinct identity, with the ability to advocate for change.

Consequently we also continue to believe that the CLD Standards Council itself needs to have a distinct identity. We believe that a well-resourced professional body for CLD, with sufficient independence and autonomy to be an effective partner for government, is a pre-requisite for achieving the goals that the Scottish Government has set. Future arrangements need to reflect statutory and policy recognition of CLD, and not treat a distinctive professional discipline as if it is an allied education practice that can be properly regulated and supported by absorption within another. They should also support improved collaboration and mutual learning between professions and between professional bodies.

The distinct identity of CLD includes youth work, adult learning and community development. This model, in which practice in each of these contexts supports and enriches practice in the others, has been recognised across the UK and internationally as a unique asset for Scotland. The model should continue to be reflected in arrangements for registration of practitioners, approval of courses and qualifications and support for professional learning, and in further development of regulation to ensure quality and consistency of practice.

If the proposal for an Education Workforce Council is to be pursued, it needs to:

- Recognise, accommodate and promote CLD professional identity, along with the professional identities of others involved;
- Ensure that the new body has staffing that includes the professional expertise required for the delivery of the current CLD Standards Council functions
- Allow previous bodies and agencies to retain their own assets for their own use;
- Identify a name for the new body that is reflective of the professionals included and of the need to empower and promote all involved.

An expansion of the GTCS is not an acceptable or viable alternative and considerable planning and preparation is required before a new body or structure that is fit for purpose can be put in place. If this proposal is implemented, CLD Standards Council would be a willing partner in establishing its governance and remit within agreed timescales.

Whilst we believe the CLD Standards Council should retain its own identity, with a governance model reflecting this; we also recognise that there are potential advantages in the creation of a new body or structure for the regulation, registration and professional learning of the wider education/lifelong learning workforce. These could arise from the sharing of back-room functions, potentially leading to more efficient use of resources; and from the mutual sharing of skills and expertise. However, benefits of these sorts could only be achieved on the basis of the planning and preparation referred to above.

It is also important to note in this context that while efficiencies may result from the creation of a new body, there would inevitably be significant costs incurred in the process, both in financial terms and in the diversion of time and energy into organisational change. An independent cost analysis should be undertaken which accounts for the needs and financial position of all involved.

Question 18

What other purpose and aims might you suggest for the proposed Education Workforce Council for Scotland?

If the proposed Education Workforce Council is established, a specific aim should be to maintain and develop the professional identity of the distinct professions involved.

Question 19

Are the proposed functions of the Education Workforce Council for Scotland appropriate?

If the proposed Education Workforce Council is established, the proposed functions seem broadly appropriate. We would recommend that the function of promoting family/carers/community engagement should be reframed as the promotion of lifelong and community-wide engagement in and with education and the education system.

The CLD Standards Council believes that the existing professional bodies and other relevant partners could and should work together to consider how greater synergy could be achieved in carrying out their existing functions and in relation to the purpose, aims and functions proposed for the Education Workforce Council. We do not believe that the expansion of GTCS to absorb the functions the CLD Standards Council is a positive or viable way forward, as it does not have the professional capacity, knowledge, skills or finance to facilitate this in its own right.

Question 20

What other functions might you suggest for the proposed Education Workforce Council for Scotland?

The CLD Standards Council believes that the following additional functions should be included in future arrangements:

- Professional approval of initial professional education;
- Promotion of human rights, including the rights of children, and of equality and diversity;
- Promotion of lifelong and community-wide engagement in and with education and the education system
- Raising public awareness of the role and value of CLD professionals (and of other professionals in education)
- Specific role and function for professional learning

Question 21

Which education professionals should be subject to mandatory registration with the proposed Education Workforce Council for Scotland?

There was a general view from CLD practitioners that mandatory registration of employed CLD professionals introduced on the basis of a realistic timescale and process would serve to enhance reassurance of CLD service users, learners, and the wider public. For volunteers delivering and supporting CLD activities, registration should be encouraged but not mandatory.

The CLD Standards Council believes that strategies for improved and enhanced regulation and registration of CLD professional practitioners need to be developed and implemented in conjunction with practitioners.

The commitment of its registered members, who until now registered through choice, is one of the CLD Standards Council's key assets. If mandatory registration of CLD professionals is introduced, maintaining this commitment should be one of the aims of the process through which this happens.

Question 22

Should the Education Workforce Council for Scotland be required to consult on the fees it charges for registration?

There is currently no fee for registration with the CLD Standards Council. The introduction of a fee would provide an income stream, which would be a welcome development, however, it cannot be considered in isolation. For example, if mandatory registration is introduced, then the introduction of a fee would be much more viable and would be likely to be required in order to pay for administrative costs. Similar considerations would apply if more employers require membership of the CLD Standards Council as a condition of employment. Without development of this kind, the introduction of a registration fee would present major practical difficulties.

Some form of consultation on fees is important but it should be recognised that few are likely to favour a higher level. We believe that the linking of fees to income is the key principle that should be applied; and that specific consideration is needed of the position of volunteers.

It needs to be recognised that the history of the different professions and the conditions of employment of many of their members are very different, which means that moving to a common position in relation to fees is problematic. This in turn has the potential to generate significant tensions if members of the different professions find themselves within a single professional body.

Question 23

Which principles should be used in the design of the governance arrangements for the proposed Education Workforce Council for Scotland?

The CLD Standards Council believes that future governance arrangements should:

- Support and empower the professional identities of distinct professional groups,
- Ensure that there is sufficient independence from government to promote professional autonomy and accountability, and to allow Scottish Government to benefit from independent sources of advice.
- Facilitate improved dialogue, mutual learning and collaboration between the professional groups.
- Be practitioner-led, while ensuring that the voices of learners and communities are heard.
- Ensure independence and autonomy from other agencies, pressure groups or trade unions.
- Ensure fair and equal representation of all professional practices involved.
- Maintain and develop the ethos, values and ethics of the organisation, ensuring this permeates through its activities.

Question 24

By what name should the proposed Education Workforce Council for Scotland be known?

The name of any new body should reflect the range of practitioners it is responsible for and their associated functions. It should be noted that education is dialogical and the name should be reflective of all its practices and methodologies. Reaching any degree of consensus on a name with these characteristics requires considerable further dialogue.

A phased handover that is supported by a clearly defined and agreed communication strategy should be implemented and take account of costs and reputational risk.

Concluding Comments

The CLD Standards Council supports the Scottish Government's aspirations to improve educational outcomes for all of Scotland's young people, families and learning communities. The CLD profession should be included in considerations of how standards of practice can be enhanced and improved, as it is important that the distinctive and vital role of CLD practice is accounted for. Whilst we look to work with others it is imperative that the CLD profession is not absorbed or becomes invisible.

As evidenced throughout this response, education does not happen only within a school or classroom context, nor in isolation from the efforts of individuals and communities, supported by CLD practitioners, to tackle real-life issues. However, within mainstream planning, decision-making and resource allocation there is still an intangible, invisible and seemingly impenetrable force limiting the involvement of CLD and the development of an infrastructure fit for the purpose of improving educational outcomes for all. Accordingly, shared professional learning across the whole education system would improve understanding of the CLD offering as a whole, extending beyond youth work, family learning, parental and pupil engagement into learning at all stages of the life course and community development. Cohesive, upfront and central recognition and support for CLD practitioners at all levels including the proposed Regional Improvement Collaboratives and Education Workforce Council is required if we truly wish to offer public reassurance and improve outcomes for learners of all ages. This is indicated by key policies such as Curriculum for Excellence, the report of the Christie Commission, the Adult Learning Statement of Ambition, the Community Empowerment Act and the National Youth Work Strategy.

The Scottish Government's support for the CLD Standards Council as the only professional body that comprises youth, adult and community development is recognised as a model of good practice across the other jurisdictions of the UK and Ireland and beyond. We recommend that this continues.

Overall we understand that an empowered, competent, professional CLD sector is necessary to improve the lives of young people and communities; neither teaching nor any other profession has the capacity or autonomy to deliver this in isolation.



CLD is not an allied education practice. In Scotland CLD is a recognisable professional practice bound in statute and policy and cannot be split into its constituent parts of youth work, adult learning or community development; nor into those who are engaged directly within school settings and those who are not.

The CLD Standards Council therefore advocates for an independent, appropriately-resourced and enhanced CLD Standards Council. It is important to note that the roles and functions of the CLD Standards Council cannot be assumed by any another professional body as no other group currently has the professional expertise, or financial resource, to deliver professional learning and approvals specific to the CLD context.

In conclusion the CLD Standards Council recognises the need to value and preserve existing good practice whilst leading a progressive, forward thinking approach to delivering education for all of Scotland's learners and communities.

**CLD Standards Council Scotland
30 January 2018**