

Response ID ANON-YSNJ-5SW5-R

Submitted to Post-School Education and Skills Reform: Consultation on legislation
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Simplifying responsibilities for apprenticeships and student support

1 Which of the three proposals do you prefer?

Not Answered

Please expand on your answer below.:

At the EAUC Scotland, we have a preference towards proposal 2 or 3, although we do see disadvantages of both as described below. We agree that the current funding landscape (proposal 1) is inefficient and see the need for change. However, considering the multitude of social and environmental issues Scotland is facing – including, but not limited to, widening inequalities and the climate and biodiversity crises – we argue that sustainability (social, environmental, and economic) must form a strong foundation of whichever proposal is chosen. Whether we can thrive as a country depends on the wellbeing of our people and the health of our planet, and our education system must take this into account.

2 What do you think are the main advantages of your preferred proposal?

Please give us your views.:

From our event with sector representatives (see organisational information question later in this consultation), we collected the following perspectives of advantages of the proposals:

Advantages of proposal 2:

- One organisation for the funding of apprenticeships and one to provide student support might make it easier for people to understand who to go to for what.
- Some respondents felt uncomfortable with SFC taking responsibility for everything in proposal 3 – two organisations might be more likely to keep themselves accountable.

Advantages of proposal 3:

- Possibility of a more coordinated approach. One organisation might have more coordinated approaches to sustainability than two separate ones.
- Data-gathering/evidence is critical so a single body might be able to administer this more effectively.

3 What do you think could be the biggest challenges with your preferred proposal?

Please give us your views.:

From our event with sector representatives (see organisational information question later in this consultation), we collected the following perspectives of challenges of the proposals

Challenges of Proposal 2:

- One organisation might have more coordinated approaches to sustainability than two separate ones.
- Data-gathering/evidence is critical – two separate organisations might struggle more to effectively administer this

Challenges of Proposal 3:

- Some respondents felt uncomfortable with SFC taking responsibility for everything – two organisations might be more likely to keep themselves accountable.
- We need spaces for innovation – a single point of reporting/responsibility allocation might become 'stale'.
- Even within a single body, effective communication between different functions and departments needs to be a priority, and the appropriate structures for this must be created from the start.
- Especially if the SFC administers student funding, students must be part of the Board - see Part 2 of the consultation.

4 Are there any other factors you think we should consider in making a decision?

Please give us your views.:

The following suggestions stem from an event we held with sector representatives (see organisational information question later in this consultation):

Other reforms in the schools system are increasingly integrating sustainability, in line with the Scottish Government's Target 2030 Learning for Sustainability Action Plan. We need an underpinning ethos of 'sustainability' across the system to ensure learners can transition between early years, primary, secondary, tertiary and adult education without facing inconsistencies in how these different systems address specifically environmental sustainability and social responsibility. We need to maximise consistency across our approaches – and, to achieve Scotland's ambitions environmental, social and economic goals, we must go beyond simply 'continuation' and look at how we can improve our progress. Much more needs to be done to embed sustainability across the education system, and in adjacent sectors, such as careers service provision (see The Green Edge: <https://greenedge.substack.com/p/remember-remember-green-careers-week>)

Questions that are important to consider when deciding about the proposals and the details of how the new processes and structures will be set up:

1. Which structure/proposal can best take environmental and social issues into account, and respond most flexibly to current and future challenges?
2. To what extent do SFC and SAAS currently have environmental sustainability and social responsibility as an underpinning ethos in their current structures and procedures (not just their strategies)?
3. How will the proposed new structures create the pathways and incentives for FE and HE learners and staff to acquire the sustainability skills and behaviours that we need?
4. How exactly will SFC connect training funding to environmental sustainability and social responsibility in order to incentivise and support institutions to deliver training that provides Scotland with the skills we need for:
 - a just transition to net zero,
 - tackling climate change and adaptation,
 - addressing the biodiversity crisis,
 - reducing and managing waste and pollution,
 while reducing inequalities and providing an inclusive atmosphere that allows all people to thrive, no matter their gender, class, ethnicity, and other protected characteristics?
5. What is Skills Development Scotland's new proposed relationship to SFC? How do we ensure the role SDS have played doesn't get lost in the new education 'landscape', specifically its involvement in activities relating to sustainability, e.g. green skills and the follow-on from the Climate Emergency Skills Action Plan 2020-25? How do we set up coordination between bodies across the system?
6. The student journey/learner experience should always be central in any decision made. The new Tertiary Quality Enhancement Framework places students at the centre - and at the recent Our Tertiary Future Conference, there was strong support for creating a system for the learner, rather than a learner for the system. How do the new mechanisms for post-school education funding achieve this in either proposal?

Governance of the Scottish Funding Council

- 5 Should the 2005 Act be amended to remove the restrictions in respect of Board appointments?

No, I have a different suggestion

Please expand on your answer below.:

Fluctuation is in the nature of a board, and constant change in the board members reflects the constant change we experience in society. If the current restrictions on 4-year terms and one-time appointments were removed fully – which is how we understand the question in this consultation - we at the EAUC and the sector representatives we consulted, would be worried that this might impede the responsive nature of the board. We also question how unlimited terms and reappointments may affect the prevention of individual board members having too much power and influence.

If the 2005 Act was to be amended regarding the full removal of restrictions of terms and reappointments, we would need clearer data on why this should be the case. The consultation paper only provides fairly superficial information, and this lack of transparency resulted in many questions and a decreased perception of trustworthiness among sector representatives.

We therefore question whether a removal of these restrictions from the 2005 Act will have clear benefits. We propose that SFC outline clearly and accessibly why the changes may be necessary, what exact changes would be made, and how accountability and an equal distribution of power will be ensured if the 2005 Act is amended.

- 6 If the Scottish Funding Council (SFC) takes on responsibility for all apprenticeship funding, what additional skills, knowledge and experience should be considered for SFC Board members?

Please give us your views.:

To ensure the board has the knowledge, skills, and experience needed, board members should represent the main stakeholders of the SFC and the tertiary education sector. These are the education organisations, students, staff, employers and society. These stakeholders should be clearly represented on the SFC board – and currently, the information that is accessible about the board does not provide much indication that these stakeholders are adequately represented.

One stakeholder that is clearly missing in the current board are students. As one of our sector representatives cited: 'nothing about us without us'. Students should be part of the Board. Importantly, sector representatives highlighted that this is a change needed at SCF in the case of proposal 3 as well as proposal 2, and they saw the current lack of student involvement in the SFC board as an issue.

Options to do this include

- nominating a student board member,
- setting up board observer roles to bring in this diversity without making students a full board member, as some of our sector representatives raised that this may be intimidating for students. It is paramount here, however, that there is a clear mechanism on how student voice is taken into account to avoid tokenism.

For either option, it needs to be clear how students are supported (training, mentoring, financial support) to make these positions accessible and inclusive. An example here is how England's Department for Education has included young voices via Youth Focal Points into their strategy development

with the help of SOS UK: <https://www.sos-uk.org/project/dfe-youth-focal-points-for-sustainability-and-climate-justice>.

Another mechanism to ensure the SFC board fully represents stakeholders' interests is to add a Future Generations Board Member role. This would be a role on the board that specifically champions the needs of future learners and staff across social, environmental, economic and cultural issues and holds the Board accountable around addressing the biggest challenges of the future (similar to Wales Future Generations Commissioner). This is necessary to break patterns of "short-termism".

Sector representatives also highlighted the need for more diversity on the board. While it is a great step for SFC to have men and women represented equally on the board, further geographical/regional, class/Scottish Index of Multiple Deprivation, ethnic and cultural diversity is needed. SFC should outline transparently and accessibly how their board represents these diversity aspects, and how board member recruitment processes take these into account.

Independent of the different roles and identities, given that the cross-cutting themes of the OF&AM reference 'Net Zero' and 'EDI', and SFC's Strategic Plan includes the goal of 'creating conditions for 'social and economic prosperity and wellbeing, and environmental sustainability', it is critical to include board members with clear sustainability/Learning for Sustainability knowledge and experience. Currently this is not transparent in the board member profiles on the SFC website. Any (statutory) guidance for the board should make reference to the need for board members to have expertise across the variety of goals in SFC's strategic plans and frameworks (including net zero/environmental sustainability and EDI), and this expertise should be transparent and mapped to these goals.

Furthermore, our sector representatives highlighted that training on environmental sustainability, social responsibility, and their intersection should be provided to board members. The EAUC can support this through our SFC funded work.

One sector representative summarised the discussion on this question at our event as: "All board members must have sustainability evidenced in the application process to join the board, and if not they must receive robust training".

7 Do you have any other comments or suggestions for governance of the Scottish Funding Council (SFC) Board or other aspects of SFC governance?

Please give us your views.:

Sector representatives also asked for more and easily accessible information about the board's interests:

What are the board's interests? Are they asking the right questions to move us towards a fairer, greener Scotland? Do they care about what learners and staff care about?

Currently, this information is difficult to extract and understand. SFC should consider how they make this transparent in any changes they make to the current set up to the board.

Enhanced functions for the Scottish Funding Council

8 Do you think we need to introduce new duties on organisations receiving public funding to provide better information to the Scottish Funding Council?

Yes, for all organisations

Please expand on your answer below. :

Currently, we lack data to understand better how our education system, including but not limited to apprenticeships and training, equips Scotland's learners to make the positive social, environmental and economic contributions that we need. Our research and experience suggest that often, both action and reporting on environmental and social aspects lack prioritisation and leadership, as it is seen as a 'nice to do' rather than an essential aspect of tackling our social and environmental crises. Yet these crises pose significant threats to the SFC's vision of an education system characterised by "social and economic prosperity and wellbeing, and environmental sustainability" (see SFC Strategic Plan), and we therefore propose that the SFC take a stronger position on institutions reporting on social and environmental sustainability aspects.

To ensure compliance, reporting on factors that are not driven by our economic and financial system (ie. reporting on social and environmental aspects) often needs to be set out as mandatory by leadership, including by Scottish Government and the SFC. Public Bodies Climate Change Duties (PBCCD) reporting is an example of this where statutory requirements have led to significant progress in obtaining data, with other devolved nations starting to follow Scotland's example.

However, while all institutions submit reports, the quality of the reports can vary as there is a lack of accountability and consequences for incomplete or low-quality reporting.

For example, the adaptation section has failed to spur much needed action on adaptation at many institutions, who have either skipped or filled out this section incorrectly, or have not provided updates between reporting years. This is problematic considering that institutions, as part of the Climate Change (Scotland) Act, must ensure their activities and programming are designed to best deliver the current adaptation programme or plan.

As this example shows, any reporting on social and environmental aspects, including in learning and teaching, must be prioritised by the SFC to truly result in the action we need. Institutions must be both supported and held accountable to providing the required data in adequate quality and scope. Providing support is equally important here, as we must avoid the reporting of important data to seem like an impossible task amongst the many other duties tertiary education staff have to fulfil.

We'll describe our and sector representatives' thoughts on what data is needed and why in the questions below.

9 Do you think there is a need to strengthen existing systems and processes for collecting data?

Yes

Please expand on your answer below. If you answered yes, then please explain why the data is needed. :

As addressed above, we need more data to understand how Scotland's education system is supporting a transition to a fairer, greener Scotland. The following are some of the reasons WHY this data is urgently needed:

Green skills gap

The UK is facing a large green skills gap of 200,000 skilled workers (green skills referring here to the skills required for technologies and solutions that help achieve net zero). In Scotland, almost every second employer reports skills gaps on green technologies. We need to better understand what programmes our colleges and universities provide, how sustainability and green skills are integrated in these, why people choose them, and whether graduates enter green jobs afterwards.

(<https://scottishbusinessnews.net/new-report-shows-scotland-outpacing-uk-in-skills-gap-reduction-but-businesses-lack-confidence-in-ai-and-green-technologies>)

Low diversity in green jobs

Research consistently finds that gender and ethnic diversity as well as numbers of disabled people across 'classic' green jobs and skills remain low (see Green Jobs, Policy Exchange, Race Report, International Labour Organisation). How do our educational programmes create an inclusive atmosphere in which people from currently underrepresented groups can feel comfortable and confident? Currently we have very little understanding of this, which impedes important steps towards a just and swift transition to a more sustainable Scotland.

<https://blog.greenjobs.co.uk/2023/09/14/the-green-jobs-gender-challenge-on-the-path-to-net-zero/>

<https://policyexchange.org.uk/publication/the-two-sides-of-diversity/>

<https://www.race-report.uk/>

<https://www.ilo.org/resource/news/ilo-advocates-inclusive-green-transition-persons-disabilities>

Behaviour and systems change for a just transition

A just transition to net zero also requires behaviour change across society (see UK Parliament and Climate Change Committee), and systems change across our economy and businesses (see IEMA). Education has a key role to play in facilitating these changes, but we have little knowledge on how it currently achieves this. We need more data on how our education and training provision impacts sustainability knowledge, skills, mindsets, and behaviours of students, businesses and communities.

<https://lordslibrary.parliament.uk/net-zero-and-behaviour-change>

<https://www.iema.net/articles/individual-action-or-systems-change-finding-the-best-route-to-net-zero>

See also article 12 of the Paris Agreement (to which Scotland has committed): "Parties shall cooperate in taking measures, as appropriate, to enhance climate change education, training, public awareness, public participation and public access to information, recognizing the importance of these steps with respect to enhancing actions under this Agreement". -

https://unfccc.int/files/meetings/paris_nov_2015/application/pdf/paris_agreement_english_.pdf

Interlinked challenges and impactful approaches

We are facing various interlinked challenges that cut across social, environmental, cultural and economic aspects. This has been recognised by the Scottish Government in their new programme for 2024/25 (<https://www.gov.scot/programme-for-government/>). These challenges include the climate and biodiversity crises, cost of living crisis and poverty, racism and discrimination, gender inequality, and many others. Our learners need to be prepared to make a positive contribution to address these crises together, and we need to better understand how this is currently addressed in education and training, where institutions need support, and which approaches are most impactful.

WHAT data may be needed - sector representatives recognised that to decide what data exactly is needed and how is this collected and analysed might require further involvement of and investment in data specialists and public engagement professionals.

Building on the expertise of sector representatives, as well as the EAUC's work and experience, the following are a first set of suggestions.

The data that may be needed to better understand how our education institutions and apprenticeship providers equip our learners to contribute to the wellbeing of people, planet, and the economy includes:

- Need for valuing qualitative data, including stories and case studies and a more robust '360 approach' based on conversations between SFC, staff, and learners. This is an integral part of the new SFC Outcomes Framework and Assurance Model as well as the Tertiary Quality Enhancement Framework – but more prioritisation of environmental sustainability and social responsibility is required to ensure qualitative and quantitative data is collected on this.

- Data that measures the longer-term impact of education provision, such as longitudinal data, student/graduate outcomes, graduate employment in sustainability jobs, career paths students undertake, impact students and staff have on the community, etc. These data would be highly influential in better understanding how training provision and student funding affects social and environmental aspects. However, this will require adequate prioritisation, training and resources.

As one of our sector representatives phrased it: "We don't really understand the student journey; why sustainability or green skills-oriented programmes are undertaken; why students choose different pathways and what restricts their choices."

- Assessment of student outcomes: Understanding how the training and education provided impacts students' knowledge and skills is key to understanding whether what we do works. A step towards assessing this is for institutional student surveys to include questions on (environmental, social, economic) sustainability (how learners' have been supported in their understanding of this as well as their development of sustainability skills).

- Better understanding of student choices: More data is required that identifies, evidences, and highlights the challenges which influence student choice around uptake and completion of sustainability or green skills oriented programmes.

- Capturing the voices of diverse learners: ensuring that we do so in a way that captures regional, cultural, SIMD diversity across Scotland.

- SFC setting expectations around action planning for Learning for Sustainability:

SFC may want to set the expectation that institutions share how they plan to evaluate and address sustainability in the curriculum and associated training provision. This could take the form of expecting institutions to have an action plan on assessment and improvement on sustainability in learning and teaching, e.g. via curriculum mapping, student surveys, or assessment of sustainability skills provision. It is key here, however, that the SFC recognises workload and resource requirements, and offers support/signposts to support. AI may be harnessed to support this – potentially tools could be developed via SFC funding. The EAUC would be happy to support this.

- Professional development data

Similar to mandatory or strongly encouraged training on Health and Safety and EDI, there should also be clearly outlined professional development that includes sustainability in learning and teaching (and sustainability of operations). Ideally this is integrated or connected with existing training, specifically on EDI. Such training is essential to meet the SFC's net zero and EDI ambitions, as well as to comply with any further data requirements suggested above. EAUC as part of their SFC funded work are happy to support the development of such trainings.

Data requirements from SFC should capture the numbers of participants, and the impacts of people who have undertaken sustainability training. If training is not mandatory, there should at least be the option to undertake this, as well as SFC communicating the desirability of having high percentages of staff trained on this.

10 Do you think there is a need to strengthen existing systems and processes for reporting and publishing data?

Yes

Please expand on your answer below. If you answered yes, then please explain the purposes for which you or others might use the information.:

To achieve higher quality reporting on sustainability (and generally) and to provide more insights about funded organisations to the public, institutions must be supported more strongly by SFC - for example through specific training or through investment in shared services staff (e.g. multiple institutions could share a data expert or a sustainability manager. The EAUC Scotland currently runs a shared services staff scheme successfully).

Colleges especially may require more support on sharing their progress on sustainability: The EAUC Scotland frequently hears strong stories of how colleges have taken steps to improve the social, environmental, and economic sustainability of their operations and teaching. Yet college staff, especially after recent redundancies, do not have the capacity to report and share their achievements publicly.

To a certain extent, some of these stories and contextual reporting will be a part of the new Outcomes Framework and Assurance Model. How will these stories be shared more widely? And how will institutions, whether FE, HE, or other providers, be connected to organisations like the EAUC, who can provide specific support on improving the sustainability of operations, estates and learning & teaching?

11 What information about funded organisations would you most like to know and why?

Please give us your views.:

The EAUC Scotland is specifically funded by SFC to provide support for sustainability action for tertiary education institutions. If there was more consistent reporting and accessible sharing of quantitative as well as qualitative contextual data regarding the integration of sustainability across institutions' operations, estates, and learning & teaching, we could target our support even more efficiently to institutions' needs and progress.

12 What, if any, additional powers should the Scottish Funding Council have in order to help ensure the post-school education and skills system operates effectively?

Please give us your views.:

About you

13 What is your name?

Name:

Kathrin Mobius

14 Are you responding as an individual or an organisation?

Organisation

Not Answered

If other, please specify.:

Third sector or charitable organisation (if not any of the above)

If other, please specify.:

15 What is your organisation?

Organisation:
EAUC Scotland

16 Further information about your organisation's response

Please add any additional context:

EAUC are the leading body for sustainability in the post-school education sector in the UK and Republic of Ireland, working to provide support and change systems to enable sustainability action. In Scotland, we are funded by SFC to provide all of Scotland's colleges and universities an extra layer of support in meeting statutory and best practice guidance relating to sustainability. Our work spans post-school education bodies' estates and operations as well as learning, teaching, and research.

The responses to the consultation event are informed by a collaborative event we held together with Learning for Sustainability Scotland (LfSS) on 4th September. Sector representatives from various universities and colleges across Scotland met to discuss their experiences of the sector and how the proposed changes could impact the work they do. Our response is based on this discussion as well as further inputs through asynchronous engagement processes.

Our responses are further informed by our current research with Scottish colleges around the integration of sustainability in learning and teaching, as well as previous publications, such as our green careers guides for students and staff (see https://www.eauc.org.uk/green_careers_guide). Furthermore, EAUC Scotland analyse and publish the PBCCD reporting data of Scottish colleges and universities to facilitate understanding of how tertiary education emissions are changing (see here - https://www.eauc.org.uk/file_uploads/eauc_scotland_pbccd_2022_23_colleges_and_universities_analysis_report.pdf).

17 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

18 Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

19 What is your email address?

Email:
kmobius@eauc.org.uk

20 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

21 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly satisfied

Please enter comments here.:

The respondent information form (word doc) contains questions that were not asked in this consultation, and some questions in the consultation were missing in the form.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: