

Empowering teachers, parents and communities to achieve Excellence and Equity in Education A Governance Review

RESPONDENT INFORMATION FORM

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- Individual
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Full name or organisation's name

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Yes

No

QUESTIONNAIRE

Question 1

What are the strengths of the current governance arrangements of Scottish education?

Comments

- The independence of GTC Scotland as the regulatory body which sets teachers' professional standards, promotes and enhances teacher professionalism, accredits Initial Teacher Education and oversees standards in relation to teacher induction, professional learning and student placement.
- This independence gives the public confidence that a neutral arbiter is ensuring standards of teaching; it gives teachers confidence that their views are understood and their professional learning needs supported; and it gives Scottish Government confidence that teachers are supported and regulated by a professional body.
- The registration of the teaching profession and its regulation by GTC Scotland which provide assurance and protection to the public and users of education services.
- Partnership working at all levels and a commitment by all partners to the delivery of high quality, excellent public services.
- Coherence of vision at national level in terms of a commitment to children and families by all parties. This commitment references and learns from international educational measures and drives educational improvement requirements through the educational system.
- The requirement to operate within a legislative framework in terms of the delivery of education provision.
- A commitment by all parties to the principles of Best Value.
- The existence of a framework for accountability.
- National terms and conditions, including pay bargaining.

The provision of educational services through local authorities should allow for democratically accountable local level oversight of the state education system. Provision of education through local authorities should also permit collaboration between schools, the sharing of expertise and skills between schools and for the use of resources in ways that avoid unnecessary duplication between schools and that allow for the generation of economies of scale. If there were to be any changes to the ongoing governance arrangements, they would need to take into account that management of services by local authorities, such as those related to finance and human resources, currently should free schools to concentrate on their core responsibilities for teaching and learning rather than activities that detract from these key priorities.

Question 2

What are the barriers within the current governance arrangements to achieving the vision of excellence and equity for all?

Comments

- In spite of the strengths of partnership working amongst bodies, the system is not sufficiently joined up, characterised by a distinct lack of coherence in the supporting infrastructure. There is too much complexity in the current governance arrangements which compromises the potential for national enhancement to be delivered in a coherent manner.
- The quality of teaching and learning, the professionalism of teachers and teacher/school leadership are the main determinants in improving excellence and equity for all. Yet, underscoring the point about complexity in the paragraph above; the current system sees pre-school and early years practitioners who contribute to children's learning registered and regulated by a body other than GTC Scotland. There is no requirement for pupil support assistants to be registered or regulated by anyone yet they perform an important support role to teachers. An increasing number of college lecturers are working with school-age students, and yet they are not subject to registration or regulation but all teachers are. Professional Standards for teachers are in place and overseen by GTC Scotland but those for college lecturers are outdated and held by Scottish Government. GTCS is a well-respected educational body. There would be an advantage in asking GTC Scotland to assume greater responsibilities in this area as this would support greater coherence, particularly in regard to pre-school practitioners, pupil support assistant and college lecturers, and offer seamless regulation from nursery to school, and to college.
- Communication, collaboration and co-ordination between different players in the education system could be improved, in particular from the perspective of parents and others outside the education system. However, the balance between these elements needs to be correct and meaningful. Real power sharing and involvement/improved representation are only good if the people involved perceive that real power is in their hands. Also, the quality and honesty of collaboration and cooperation in partnerships can sometimes be 'protecting turf' as organisations aim to protect their territory. Reducing the complexity in the management of education might go some way to building clearer lines of communication with parents and the public.
- Local Authorities have an important role in delivering educational excellence, but there are variations between educational attainment in different authorities, even when considering attainment from pupils from similar socio-economic backgrounds.
- Lack of sustainable funding models, ineffective deployment of resources and unnecessary duplication in some areas.
- Lack of knowledge and capacity building particularly at the 'middle'. In terms of middle tier functions, there should be consideration of the best solutions depending on the local circumstances rather than a one size fits all approach. There needs to be some structural consistencies however it may be that there should be a range of solutions e.g. for urban versus rural communities.
- Lack of trust from the 'centre' in terms of delegated powers and too much unnecessary bureaucracy. There is a sense in which individual schools in individual communities are not empowered enough to take forward educational change and improvement in ways that reflect the particular context of individual communities.
- Lack of parental involvement and community engagement in the delivery and development of schools.
- Lack of focus on relationships between teachers, learners and young people.
- Insufficient linking of education with the rest of society and economy, and a lack of transparency concerning learner outcomes and wider business and societal needs and results.

It remains clear that the relationship between national and local government falls short of what might reasonably be expected. For example, the history of the implementation of Curriculum for Excellence and qualifications reform has been characterised by unjustifiable variations between local authorities in terms of their willingness and ability to meet system-level requirements. As a result, support for teachers and learners has been inconsistent and has undermined the principle that children have common entitlements to educational provision across Scotland, regardless of the school they happen to attend or the local authority area in which they happen to live. These shortcomings should not be ignored and it is appropriate for the Scottish Government to consider ways in which middle-tier functions might become more effective.

Question 3

Should the above key principles underpin our approach to reform? Are there other principles which should be applied?

Comments

The principles which are listed are helpful and appropriate. Other principles may include:

- The desirability of utilising the best international educational research in order to underpin the development of educational policy and practice.
- Strengthening the role of local communities in the oversight and governance of local schools.
- Recognising where there is already excellence in governance in the educational system in Scotland and utilising this to the optimum extent in the planned governance reforms.
- Gaelic medium education (GME) in Scotland has strengthened significantly over recent years and there is enhanced awareness of both the benefits of bilingualism and the importance of GME in regard to the increase in the number of young Gaelic speakers in the 2011 census. The inclusion of Gaelic medium governance structures, particularly the role of Bòrd na Gàidhlig, in the review would seem to be an important consideration.

The following should also be reflected fully in any principles:

- Partnership and meaningful and effective communication.
- Shared resources.
- Inclusion.
- GIRFEC as the foundation of action and support for children and families.
- Multi-agency/Multi-disciplinary working.
- The better integration between primary and secondary schools, as well as secondary schools and further/higher education.
- Best Value.
- Early Intervention.
- High quality.
- Coherence. There is a need to have a more joined up approach to all sectors from early years, schools, colleges and universities. The pathways for young people need to be clearly articulated at all stages and to all relevant audiences including young people and their parents/guardians.
- Simplicity.
- Streamlining
- Innovation.

The principles identified by the OECD and the Scottish Government in the consultation document are not inappropriate in principle. However, it is essential that governance at the middle-tier level is subject to an effective form of democratic accountability. The key challenge for the Scottish Government will be to ensure that the distribution of governance functions at national, local and school levels is fit for purpose.

In particular, it is essential that these functions are distributed in ways that:

- do not distract schools from their core focus on teaching and leading teaching and learning; and
- ensure that national frameworks, including those in respect of teachers' pay and conditions, the curriculum and qualifications and support for children, are applied consistently and effectively; and
- do not create additional bureaucracy.

Question 4

What changes to governance arrangements are required to support decisions about children's learning and school life being taken at school level?

Comments

- Enhanced clarity regarding the boundary between the responsibilities of Local Authorities in driving educational improvement and the responsibilities of individual schools and clusters of schools. This would include clarity around the extent to which individual schools are empowered to make budgetary decisions which reflect the local context.
- More flexibility at school level to interpret educational policy so that the specific local circumstances can be more readily taken into account in regard to educational provision.
- More accountability of schools to local communities, parents and stakeholders through a strengthened role for Parent Councils and HMIE.
- The reduction/ removal of tension created by the demands of the corporate centre and the requirements of education.
- Increased flexibility regarding staffing decisions and priorities.
- Increased timetabling flexibility for schools and greater opportunities for young people to engage in more non-academic routes of achievement.
- Removal of the tension created by incoherent reporting systems which can lead to misunderstanding and poor decision making.
- Increased flexibility around funding although it is recognised that there is little appetite amongst some HTs for additional financial responsibility since this will add significantly to bureaucracy.
- Increased flexibility around models of school improvement to allow for local decisions although it is suggested that there is little more that can be devolved that would improve learner outcomes without increasing costs overall in the education system.
- The consistent use of effective cluster models and learning communities.
- Allowing HTs/teachers time to focus on learning and teaching as their first and key priority and then build the services and responsibilities around the needs of children allocating support tasks as appropriate.
- Access to an effective supply register – at a national level.

It is important that responsibilities for governance that are devolved to schools do not distract from the key principles set out above. However, it is legitimate for the Scottish Government to review whether the balance of accountabilities between different levels of the system is set appropriately. Given that the key responsibility for schools is to continue work to raise standards of progress and achievement, it is right the governance responsibilities that are allocated to them are focused on this core function rather than other functions that would be better allocated elsewhere. A key lesson from other jurisdictions is that allocation of inappropriate responsibilities to schools, particularly those related to the pay and conditions of the workforce, acts as a distraction from work focused on teaching and learning and can result in the implementation of poor HR policy and practice. An additional key consideration is the capacity of schools to discharge governance capabilities effectively. The importance of capacity issues requires detailed consideration to be given to the training and support offered to schools in this respect.

Question 5

What services and support should be delivered by schools? What responsibilities should be devolved to teachers and headteachers to enable this? You may wish to provide examples of decisions currently taken by teachers or headteachers and decisions which cannot currently be made at school level.

Comments

As schools' key functions relate to teaching and leading teaching and learning, arrangements for governance at system, local and school levels should reflect this principle. Governance responsibilities should be distributed in ways that recognise that all children have a common educational entitlement and that this entitlement can only be delivered effectively through a common framework of teachers' terms and conditions of employment. School-level flexibilities should be focused on ensuring that schools can meet identifiable and distinctive local needs within the context of these broader national frameworks.

There should be more flexibility than currently for HTs and teachers to take decision around learner journeys and learning interventions within schools than currently is the case.

- There should be more flexibility than currently for HTs to use data on pupil attainment to make decisions and fund decisions about educational improvement particularly where there are issue around educational attainment in specific subjects or age phases.
- HTs should have more direct ownership over the appointment of teaching staff, and be more empowered to make decisions about where staffing should be deployed in the light of attainment data and other educational measures.
- All schools should offer full wrap around care as standard.

The following responsibilities might best be devolved to teachers and HTs:

- Learning and teaching and child development 3-18 in partnership with parents and carers. This means them having responsibility for the quality of the curriculum, for achievement and attainment, for school improvement and quality.
- Partnership working with those who support children and families; not delivering but supporting and valuing the work of partners e.g. health, social work.
- Effective deployment of staff resource to maximise impact on learning and meeting needs, and to play a lead role in supporting ITE students and probationers.

The following responsibilities might best not be devolved to HTs:

- Professional Learning/In-service provision; schools day pattern; best use of non-contact time; deployment of support staff; placing requests; school opening hours; and holiday patterns.

It is also recognised that some find it highly questionable to devolve any responsibility for support functions to schools or for sourcing supply teachers on the basis this is likely to be inefficient and increase costs. In devolving more power to schools, it is suggested that there is much more likelihood of accusations of 'nimbysism' and promoting competition and protectionism amongst schools and that this would not be desirable if the Scottish Government's ambition is to create the most efficient education system overall.

With the demise of the Chartered Teacher scheme, it is felt by some that the Scottish Government should take this review as an opportunity to incentivise and improve the earning capacity of teachers through them acquiring higher standards in their teaching.

Question 6

How can children, parents, communities, employers, colleges, universities and others play a stronger role in school life? What actions should be taken to support this?

Comments

- Better, more convenient and more flexible access to schools, with a particular focus on encouraging and supporting parents who have personal difficulties to contribute to their children's education.
- Allowing more effective use and access to schools at various times as part of considering how schools support communities and the needs of the local and wider economy.
- Better engagement of business and industry in work placements and building the employability prospects of all children and young people.
- Better physical learning environments.
- Better design of school environments to encourage community use.
- Higher level of community engagement in school design-ownership.
- Genuine engagement opportunities for the range of stakeholders.
- Greater response to pupil voice, including ensuring a wider range of learners engaged in pupil councils.
- Inclusion of young people in recruitment processes of key staff in education.
- Engagement with universities in terms of the career long learning of education staff at a variety of levels.
- Active and on-going engagements with colleges.
- Review of parental engagement structures to be more representative as opposed to a current perception of them as 'interest groups'.

It is right that the education system allows all those with a legitimate stake in its success to have opportunities to engage with it meaningfully. In respect of employers, for example, it is important that they are able to support the progress and achievement of pupils through, for example, playing a more active role in the provision of high quality work-based learning opportunities. At present, too few employers are prepared to make this important contribution to pupils' learning experiences and the Scottish Government should take more active steps to ensure that more employers play their part in this regard more consistently. Further steps to promote outreach work by universities, particularly in relation to pupils from unrepresented groups, is also key. Arrangements currently exist to allow parents and children to engage in school life through, for example, parents' forums but the effectiveness of these forms of engagement remains variable. There is, however, a need to be wary of 'career parent body members' who do exist and are engaged mainly on single issues, usually relating to personal circumstances. There is a further need for employers to be pressured into taking more effective part in areas such as job experience opportunities and careers events, some of which are of limited value. It should also be recognised that employers have needs to be fulfilled in terms of a fully functioning, successful economy and schools, and the education system in general, should work with them in order to help achieve this where possible.

It is therefore legitimate to review these arrangements but this review must be done in a way that respects the rights of teachers and school leaders to exercise appropriate professional autonomy over decisions related to teaching and leading teaching and learning. HTs should have more ownership over decisions, including the deployment of staffing resources, which directly affect their schools and the educational attainment within them. It follows that these decisions should be informed by an enhanced role for local stakeholders in the governance arrangements for schools, both to inform the HT's decisions, but also to enhance a sense of accountability to key local stakeholders, including parents and employers. A careful balance would need to be struck here in regard to the extent to which the HT was accountable to the local authority or to local stakeholders, but it is logical that local governance and oversight arrangements should be strengthened if HTs are to have more flexibility in making key leadership choices.

Question 7

How can the governance arrangements support more community-led early learning and childcare provision particularly in remote and rural areas?

Comments

It is essential that there is a recognition of the significant importance of early years education. The development of one entity for professional registration and regulation across the education system and early years provision would also be a relevant consideration as it would strengthen professional cohesion. GTC Scotland is well placed to take on such a role. So too would the development of a set of Early Years Professional Standards, overseen by GTC Scotland. These actions would bring increased linkage across the education system, support effective professional dialogue between early years practitioners, aid transitions and support cross sectoral working.

- The development of integrated models linking schools to early years and child care provision is an important consideration here, particularly in remote and rural areas. Such a step would increase the profile of schools within communities and may provide a context in which educational attainment could be strengthened and value for money secured.
- As part of these arrangements, leadership teams across education and early years provision should become more integrated and cohesive.
- The creation of community networks built around a social enterprise model.
- Consideration of models of early years education as offered by some Scandinavian countries.
- More effective use of parental leave to support community early years provision.
- Creation of multi-agency hubs.
- Development of the child minder network and professional development.
- Better use of college provision.
- Better use of crèche provision and associated professional learning and recognition.
- Online meetings, webinars and other types of IT solutions which can support community integration, especially in rural and remote areas.

Strategic planning for early learning and childcare is a key responsibility of middle-tier entities. Experience from other jurisdictions emphasises that without local/regional oversight and management of provision, it is not always established in ways that secure equality of access for all children and can result in inefficient allocation of resources between different areas. Given the challenges that continue to be faced across the system in respect of the sufficiency of childcare and early learning provision, it is legitimate for Scottish Government to review the extent to which the current local authority-led model is operating effectively.

Question 8

How can effective collaboration amongst teachers and practitioners be further encouraged and incentivised?

Comments

- Educational research suggests that transition arrangements between primary and secondary schools can lead to a dip in educational performance at the point of transition. Therefore, enhanced collaboration between teachers across the top end of primary and the lower end of secondary (BGE) is an important consideration, and should be underpinned by the development of appropriate registration categories by GTC Scotland.
- Extension of GTC Scotland's Professional Recognition Awards to incentivise greater practitioner enquiry and engagement with research by teachers.
- Increased recognition of the positive impact of collaboration, including closer integration of early years practitioners in the education system which will enhance collaboration across the whole system much further.
- Shared understanding of agendas and priorities, including shared professional learning agendas.
- More support for cross-sectoral work and more cluster improvement planning.
- Better sharing of good practice and more joint professional learning events.
- Co-creation of professional learning programmes.
- The Highland Council development of a 3-18 model of schooling, particularly in remote and rural areas is an excellent way in which collaboration amongst teachers across the whole age range can be enhanced.
- The utilisation of technology, including video conferencing and online activity will support the development of collaboration amongst teachers and practitioners, particularly but not exclusively in remote and rural areas where isolation may contribute to lower educational attainment. The E-sgoil model has much potential here.
- Increasing understanding that education is a collective responsibility.

As noted above, the organisation of schools under middle-tier entities should provide opportunities for greater collaboration and partnership working between schools and practitioners. Irrespective of the number of national agencies moving forward, it will be critical to ensure that each organisation collaborates to help achieve agreed common objectives and targets.

It is clear from experience elsewhere that accountability systems based on competition between schools generate powerful disincentives to co-operation across the system. Instead, governance and accountability frameworks should create the circumstances within which schools understand that there is a shared responsibility for the educational progress and wellbeing of all children living in the communities they serve, regardless of the individual school they happen to attend. Encouraging such collective accountability and responsibility is an important driver of professional collaboration.

Question 9

What services and support functions could be provided more effectively through clusters of schools working together with partners?

Comments

Clustering of schools is already an important feature of the education system. Clustering allows teachers and school leaders to share expertise, resources and facilities in ways that benefit all learners, and it can permit the provision of a greater variety of learning pathways than any one school is able to provide on its own. It also permits schools to take collective responsibility for the learning of all pupils across a community and foster a collaborative framework of accountability rather than one based on competition and contestability.

Clustering can lead to the provision of a broader curriculum, both in terms of the range of subjects which can be offered in secondary education, and with regard to curriculum enhancement – for example educational visits and the involvement of external community stakeholder in education - than would be possible without clustering, particularly but not exclusively in remote and rural communities. This is something which should be welcomed and encouraged.

However, it is important to develop clustering arrangements within a clear national structure that sets out common expectations in relation to the ways in which schools within clusters should relate to each other. These structures should also recognise that collaboration can result in manageability and workload challenges that must be managed if the benefits of co-operation for staff and learners are to be secured in practice.

Educational support services, such as educational administration, breakfast clubs and after school provision, and services relating to additional support needs, can be more efficiently and consistently delivered within clusters which at the same time reflect the local needs, while also assuming a delivery pattern which aligns with regional and national policies. Other services and functions that could be considered are:

- Childcare wraparound services and multi-agency support.
- ASN provision, staff deployment and planning for the delivery of better outcomes would all be improved if resources were deployed more effectively.
- Better provision of Breakfast Club and After School provision.
- Family and Community learning, including peer support for parents.
- Extra-curricular provision.

Question 10

What services or functions are best delivered at a regional level? This may include functions or services currently delivered at a local or a national level.

Comments

- GTC Scotland's Student Placement System, based around regional partnerships between ITE universities and local authorities.
- Workforce planning.
- Professional Learning.
- HR functions.
- Standards and Quality reviews.
- Regional Supply.
- Regional ASN.

As noted above, middle-tier entities have a key role to play in the strategic oversight and management of the education system. They are best placed to secure and deliver advice and support for schools, including school improvement functions, and to secure the provision of specialist services, for example, those related to ASN, that are most efficiently and effectively delivered at a level higher than that of the individual school. As a result of their strategic functions, middle-tier entities also have a central role to play in the deployment of the school workforce and in ensuring the national frameworks of staff pay, terms and conditions are enforced in all schools. Any regionalisation would need to take account of the challenges set out in Q11.

Question 11

What factors should be considered when establishing new educational regions?

Comments

- Size, diversity and geography of the regions.
- Costs and sustainability.
- Existing regional alliances.
- Past history, in particular ensuring that mistakes of past, such as combining vastly dissimilar areas, are not made. Also required will be the plans and contingencies if the regionalisation plan fails to succeed.
- Clarity of roles, responsibilities and outcomes, particularly in terms of what regions are expected to achieve.
- Deprivation levels.
- Transition arrangements.
- Clarity of strategic vision, definition of purpose and rationale for creation and sharing this with stakeholders and strength of leadership in implementation.
- The assurance of increasing transparency and reducing bureaucracy.
- Empowerment, including parental and stakeholder involvement in governance.

The Scottish Government will need to consider how such regional bodies would relate to existing local government functions and whether the creation of larger regions could offer opportunities to deliver better economies of scale and more effective specialist services. Critical to the effective operation of such regions would be the extent to which they would be subject to effective democratic accountability and their ability to gain accurate local-level intelligence about the schools for which they would be responsible.

Question 12

What services or support functions should be delivered at a national level?

Comments

- Registration and regulation of teachers and other education professionals by GTC Scotland. This should be extended to all members of the education workforce to include preschool and early years practitioners, college lecturers, pupils support assistants and youth workers. Such a move would bring greater cohesion and consistency in areas such as professional standards and professional learning, and allow pupils, parents and the public to see a clear pathway of regulation of education professionals providing reassurance that standards are being upheld by a body independent of government.
- Professional Standards for teachers. Scottish Government should transfer responsibility for Further Education Standards to GTC Scotland to bring coherence and credibility to these important standards. Likewise, standards for Early Years professionals should be developed by GTC Scotland.
- Recording of professional learning through MyGTCS, My Professional Learning and Professional Update; all of which are operated by GTC Scotland. Support for that professional learning journey is currently provided by GTC Scotland and could be enhanced nationally.
- Teacher Induction Scheme as operated by GTC Scotland.
- Accreditation of Initial Teacher Education Programmes and defining a national system for teacher education, initial and continuing, as undertaken by GTC Scotland.
- Student Placement System as overseen by GTC Scotland.
- The oversight and progression of Gaelic Medium Education policy and practice
- Examination policy, framework and National Qualifications.
- National Staffing Standard.
- Standardised school holidays.
- Standard for Headship.

The core role of national level bodies is to establish - and take ultimate responsibility for - common entitlements across the education system. This role should continue to include, for example, the setting of requirements in respect of the curriculum, qualifications, support for pupils with ASN and on matters that impact on all schools, such as behaviour. It is essential that issues relating to the workforce are managed and overseen at national level to ensure that these common entitlements are delivered in practice. These responsibilities include establishing and maintaining the framework of terms and conditions of teachers and school leaders, setting standards for ITE, professional development and managing the recruitment of teachers into the profession.

Question 13

How should governance support teacher education and professional learning in order to build the professional capacity we need?

Comments

- The system of accrediting initial teacher education through GTC Scotland should continue. It provides assurance that the quality of ITE programmes is robust.
- Innovative approaches to initial teacher education, including approaches which deepen partnership working between schools and Universities and which enhance the role of schools should be incentivised.
- A national approach to workforce planning – taken forward through the regions should continue, as should a targeted approach to encourage recruitment to the profession particularly in remote and rural areas.
- A flexible approach to initial teacher education should be encouraged, particularly cross phase programmes.
- Gaelic Medium teacher education provision should be supported by a cohesive national strategy, including a recruitment and retention strategy.
- In the interests of a coherent national approach, consideration should be given to a national strategy for initial professional training/education for all.
- One body should be charged with supporting and transforming teaching to a Masters-level profession, for example through GTC Scotland's My Professional Learning, and Professional Update.
- Increased resourcing and profile for GTC Scotland's National Practitioner Enquiry Hub.
- The development of a national professional learning framework.
- Development of a national Return to Teaching Programme overseen by GTC Scotland.
- Equality of access to professional learning – Masters credits.
- National Professional Learning Programme for supply teachers.
- Greater partnership working across Professional Learning providers.

There is a clear role for schools in the delivery of teacher education and professional learning. For example, through the provision of placements to teachers in training and the management of the PRD process, schools need to be well placed to provide teachers with the access to the learning and development opportunities to which they are entitled. Middle tier bodies have an important role to play through the provision and commissioning of these learning and development opportunities and in engaging with regional organisations, particularly universities that play a key role to play in this respect. GTC Scotland's current position in this regard is strong and it has successfully run Professional Update and developed MyProfessionalLearning on behalf of Scottish Government. It is incumbent on the Scottish Government to ensure that governance structures at each of these levels have the capacity and expertise to discharge these responsibilities effectively.

Question 14

Should the funding formula for schools be guided by the principles that it should support excellence and equity, be fair, simple, transparent, predictable and deliver value for money? Should other principles be used to inform the design of the formula?

Comments

These principles are important characteristic features of any effective school funding formula. It is recognised that it will continue to be largely influenced by staff costs. However, it is important that the principles are developed further to reflect the realities that schools have to face in seeking to meet the needs of all the pupils for whom they are responsible. For example, it is essential that the funding formula reflects the fact some schools operate in areas of significant socio-economic disadvantage or may work with children and young people with significant ASN. It is important that these requirements of an effective system are not subordinated to other priorities. In particular, privileging simplicity as an objective may create pressure to overlook the need to tailor funding in ways that meet the often complex circumstances of individual schools and local authorities.

Question 15

What further controls over funding should be devolved to school level?

Comments

It is difficult to give a meaningful response to this question until the Scottish Government has set out in further detail the precise nature of the range of governance responsibilities it intends to allocate to different levels of the education system. It is critical that funding arrangements reflect the details of this settlement so that resources are available to allow responsibilities to be discharged effectively at each level. It also has to be recognised that financial skills are not always a strength of some HTs and that they may need a financial/business specialist within their leadership team.

As it is, approximately 85% of controllable spend is already devolved. Any additional funds must be able to evidence improved learner outcomes. It is difficult in practice to devolve more unless for example staff costs are devolved which could lead to tension on national pay bargaining and conditions.

- Clearer lines of reporting.
- Clearer roles and responsibilities and sharing of these.
- Less of a focus on actions and a greater focus on an understanding of impact.
- The recognition of the power of collective reporting.

Question 16

How could the accountability arrangements for education be improved?

Comments

Accountability arrangements should operate to promote collaboration and partnership working across the education system. This has particular implications for the way in which the Scottish Government takes forward the provisions set out in the National Improvement Framework. Accountability frameworks also place significant responsibilities on those with leadership and management responsibilities across the system. It is for this reason that the GTC Scotland Standards for Leadership and Management should be given sufficient weight and, as a minimum expectation, be placed on an equal footing to the Standard for Full Registration, in particular with regard to competence and fitness to practice.

- Some elements of the response to this consultation focus on enhancing the flexibility that school leaders have to manage their own schools, responding to local communities and contexts in order to enhance learning through effective local decision making. If local stakeholders – employers, parents and pupils are to be more involved in the local governance of education – then it is appropriate that schools and HTs are more explicitly accountable to those stakeholder groups, particular in regard to the delivery of national key performance indicators.
- A stronger and more co-ordinated parental and pupil/student voice, for example through the involvement of parent, pupil and public member representation on any boards appointed by Scottish Government (as per all public boards) to ensure that those who consume the services are listened to and involved directly in creating policy.
- More simple, accessible and transparent reporting and clearer lines of reporting.

Question 17

Is there anything else you would like to add regarding the governance of education in Scotland?

Comments

GTC Scotland welcomes the opportunity to comment on this governance review, and looks forward to being directly involved in playing our part in the implementation of the new arrangements once these have been clarified and approved.

GTC Scotland feels that it is unfortunate that Scottish Government did not see it appropriate to include other bodies, such as the College Development Network, the Scottish Schools Educational Research Council and the CLD Standards Council within the scope of the consultation since these bodies already have links with the mainstream school education system.

There is a clear and absolute need for an independent regulator like GTC Scotland which operates as the guardian of a set of world leading professional standards*. These standards provide an example of professional expectations at their best and provide the way ahead for other education professionals. The development of a suite of professional standards across educational professionals beyond teachers, and housed within GTC Scotland, would bring both a cohesion and streamlining across education in Scotland and provide opportunities for meaningful professional dialogue using shared language and values with a shared focus on positive outcomes for children and families. This includes those who work within the early years and college sectors. Such an approach would more effectively support the aspirations of the Scottish Government's early years policies and the DYW agenda.

Presently there is a significant degree of fragmentation across education. This ranges from Early Years to post 16 provisions. A move to develop 3-18 provision within one community of learning would both support and challenge present practices and cultures, and promote collaborative learning and sharing of practice.

Clearly the consultation has a focus on governance and therefore structures, systems and processes. The hope of the consultation is that these are reviewed and improved. Importantly, however, part of the review is to ensure that the young people of Scotland achieve improved attainment. Research clearly indicates that the quality of any education system cannot be outweighed by the quality of its teachers. It is therefore important to ensure that part of the review is to establish the best structures and resourcing for the professional learning of teachers across Scotland now and in the future.

*OECD ref. *Improving Schools in Scotland: An OECD Perspective (2015)*