

Children in Scotland

every child - every childhood

EXCELLENCE AND EQUITY IN EDUCATION - A GOVERNANCE REVIEW

SCOTTISH GOVERNMENT CONSULTATION RESPONSE

CHILDREN IN SCOTLAND

Introduction

Children in Scotland is the umbrella body for the children's sector. Our membership is made up of over 500 organisations and individuals working in the public, private and voluntary sectors in a variety of fields including education, health, social care and childcare.

We aim to identify and promote the interests of children and their families and ensure that policies and services are of the best possible quality, capable of meeting the needs of children and young people living in Scotland.

This response has been informed by the views of our membership, partners and discussion at a specially convened meeting of the Scottish Parliament Cross Party Group for Children and Young People.

Children in Scotland strongly supports the Scottish Government in its determination to deliver an education system that fulfils the twin principles of providing excellence in education as well as equity of outcome, for all children and young people educated in Scotland (Scottish Government 2016).

Subsequent to the consultation was published, the most recent round of the Programme for International Student Assessments (PISA) was announced. This demonstrated that since 2006, Scotland has fallen from 11th to 23rd in reading, from 11th to 24th in maths and from 10th to 19th in science - Scotland's worst performance since the survey began and continuing a downward trend (OECD 2016).

These results are disappointing and add additional weight to the Government's efforts to improve the excellence of our education system. Relevant evidence which underlines the importance of the Government's commitment to equity includes the finding that disadvantaged pupils from Scottish schools are considerably less likely to go on to university than their counterparts from anywhere else in the British Isles (The Independent 2016) and the gap in educational attainment between Scotland's poorest and wealthiest children, where the vocabulary of a five-year-old from the poorest quintile of children is on average 13 months behind that of those in the richest quintile (Joseph Rowntree Foundation 2014).

It is critical that we also value the strengths of our education system. Recent positive statistics include temporary and permanent exclusions continuing to decline; more

young people are leaving school to positive destinations and there is some progress in narrowing the attainment gap between looked after children and those who are not.

Nevertheless, it is right that the Scottish Government's determination to address the challenges of excellence and equity is matched by a willingness to hold the whole system to account – itself, local authorities and its schools, national agencies such as Education Scotland and others - for Scotland's performance and the actions being taken to improve. Where we struggle is the leap from this legitimate and necessary calling to account to the narrow solution of removing local authority responsibility for improvement.

We welcome much of the Scottish Government's response to improving all children's outcomes. In particular, we note the range of policy interventions, frameworks, legislation and guidance aimed at tackling poverty and creating a fairer, more socially just and prosperous Scotland. The investment in early learning and childcare is just one example. We also welcome the long-standing commitment to supporting the implementation of curriculum for excellence.

However, because of the significant changes which all children's services are experiencing, schools in particular, we are concerned about yet more reorganisation. We believe the education system needs stability for a period to allow schools to embed change and improvement. We also argue in this response that there is no compelling evidence provided in *Delivering Excellence and Equity in Scottish Education: A Delivery Plan for Scotland (2016)* to suggest that reorganisation of the education system will support the requisite improvement in excellence and equity in Scotland's education system.

A related point is made by the OECD report, with one particular recommendation cautioning (p.20);

"It is important to ensure... that with so many different programmes and initiatives, they are both efficient and effective. For this, a developed evidence base, drawing on the results of evaluation and research, is essential."

Extensive consultation with our members and partner organisations has indicated that there is little appetite among professionals or parents for significant changes to existing school governance arrangements, and a number of concerns about potential negative impacts of such changes.

We share these concerns and in representing our membership, we must emphasise the following points:

1. All parts of the education system must be held to account and clearly accountability of all parts needs to be strengthened in the light of current results. We are aware of no published evidence that suggests that removing local authority accountability is necessary for the improvement of the educational outcomes for every child and young person or the improved leadership of improvement at school level.
2. We find puzzling the manner in which the Scottish Government cites the

OECD's recommendations as justification for what appears to be an attempt to decouple schools from local authority control, when the OECD could not be clearer in its insistence that 'local authorities are integral' (p.10) to developing effective responses to closing the attainment gap and specifically cautions against adopting a centralised 'top-down' approach.

3. We support the OECD's call for "strengthening the middle" and to support closer and more aligned school groupings and peer support. We understand from our membership that this is happening and should be expanded but we do not understand why it is believed this is being prevented under the current accountability arrangements.
4. We are unclear as to what are the constraints, which local authorities are placing on school improvement? Is there a track record of preventing schools to develop strong partnerships and groupings at local and regional levels? We believe strongly that local authorities should do their utmost to encourage these groupings. However, shouldn't the focus be on ensuring that "the whole system" has the capability to make the changes identified as necessary by these groupings? These changes are likely to include questions about the national terms and conditions of teachers and other staff and the requirements made by Education Scotland, the General Teaching Council of Scotland (GTCS), the Scottish Government and the Scottish Qualifications Authority (SQA). Looking at local authorities in isolation is unlikely to achieve the Scottish Government's ambitions for transformation.
5. We also share concerns that the sustained cuts to local authority budgets combined with the current and potential increase in child poverty rates, represent the greatest barrier to eliminating the educational attainment gap in Scotland, with councils finding it increasingly difficult to provide the full range of interventions which research proves are most effective in supporting children and their parents, whether in the home, at school or in the wider community.
6. We think it would have been helpful to balance this consultation by describing the positive role that local authorities provide in fulfilling their statutory duty for school improvement. This includes an authority-wide, supporting and co-ordinating role to implement national guidance; develop appropriate local responses to specific needs, such as additional support needs; together with important operational functions for schools.
7. We also must highlight the concerns across children's services providers about further significant upheaval at a time when the wider children's services landscape is so complex and the raft of reforms to education and health and social care are yet to be fully absorbed. The introduction of integrated joint boards (IJBs) has meant that certain aspects of children's services have been transferred in 18 of the IJBs, although there is a great deal of variance between the 18. The benefits and challenges of such arrangements are not yet understood, with the financial context facing local authorities and IJBs acting as another reason to exercise caution over further large scale reform.

Therefore, Children in Scotland has reached the conclusion that it is not the opportune moment to embark upon significant restructuring of the relationship

between the Scottish Government and local authorities. Indeed, we believe that it would be an unwelcome distraction from the real and very pressing needs in Scottish education that would do nothing to meet the Scottish Government's laudable aim of eliminating the educational attainment gap.

Our preferred approach would be to focus on what a wide range of evidence indicates is critical for improved school performance. Creating a culture in schools and across the whole system that supports "successful learners".

The OECD 2016 report is very clear that a critical area for Scotland is that teacher development must be focused on improving and developing their skills in the assessment of children and young people's learning.

This reinforces, Graham Donaldson's 2010 report's recommendations. Most importantly, in our view, is that assessment has been identified by children and young people as the area of improvement which they most require and crave and can be summarized by our leaders of learning project:

"help us understand how well we are doing and how we can improve"

Our response to the Scottish Government's response to the National Improvement Framework expressed dismay with the introduction of standardised assessments and the apparent rejection of Assessment is for Learning (AiFL), widely regarded as an international world-leading approach and designed to encourage successful learners. (see <http://www.childreninScotland.org.uk/consultation/call-for-evidence-on-the-national-improvement-framework-for-scottish-education-november>). Given the concerns expressed by all the key education agencies and thinkers of the bureaucratic burden being placed on teachers and schools by an over-concentration on narrow, assessment criteria (see also responses to the ongoing Parliamentary Education and Skills Committee's review of, among others, SQA and Education Scotland), we believe a more fruitful route for improvement would be to listen to the views of children and young people, together with our educational experts and focus on supporting schools and teachers to improve dramatically their approach to assessment, as recommended by OECD?

Question 1

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

Children in Scotland believes that the current system of school governance confers a number of important strengths, providing a mechanism of school oversight that is well-established, democratically accountable and effective in delivering both the local level support that schools and teachers rely upon, as well as the strategic direction required to meet national policy objectives. Any replacement must replicate these strengths.

Local authorities have a statutory duty to providing and improve education services. They commission supporting services for schools, broker agreements, develop and resource strategic priorities for education across the local authority area. They support schools by providing guidance on how to go about delivering national policy at a local level, helping schools to ensure that they are aware of and comply with legislation covering all aspects of their work, ensuring a consistent standard implementation of national policy at local level across all schools.

As is made clear in the Devolved School Management (DSM) Review (Cameron 2012) there have been 'clear instances where leadership at local authority level has been critical to making improvements and has driven change at local level' (p. 16), with the accompanying Examples of Practice report compiled by the Association of Directors of Educational Services (ADES) providing numerous examples of good practice that demonstrate how local authorities are already successfully delivering on the attributes which can be said to be at the heart of this present consultation, namely; subsidiarity and empowerment, partnership working, accountability and responsibility and local flexibility (Scottish Government 2012).

Since the publication of the Christie Commission, it is Children in Scotland's experience that most local authorities are aiming to be consensual and collaborative, promoting partnership working and proactively seeking areas where service delivery can be shared. Nevertheless, we agree that far greater progress should be made and ,at times, progress is frustratingly slow. The PISA results and the persistent equity gap in attainment demonstrates this.

As mentioned in our opening comments, we also believe that the existing mechanisms of school governance provide schools with the necessary flexibility and autonomy required to allow teachers to make the decisions they believe are necessary to support their children and young people.

With local authorities providing essential operational functions such as corporate governance services (finance, legal, human resources), estate planning and management as well as a range of non-educational support facilities, such as transport, IT, catering and cleaning services, school staff should then be able to spend as much time as possible focussing on improvement in their school grouping, their own school and in the classroom, unburdened by administrative functions which simply add to workload rather than confer any pedagogical advantage.

The proposals also seem at odds with the Scottish Government's very welcome leadership to 'root out pointless bureaucracy' in schools (Scottish Government 2013) as part of its Tackling Bureaucracy review. Wouldn't these proposals, establish a new layer of administrative and bureaucratic burdens which could only serve to detract from that review's aims of reducing the 'paperwork and overly complex processes' that are 'getting in the way of teaching and learning' (Scottish Government 2013)?

We also note that parents, the group that the Scottish Government seem to be targeting most prominently in this consultation, appear (on the basis of the evidence that we have collected) relatively unenthused by there proposed reforms. This is evidenced from the response to this consultation submitted by our partner organisation the National Parent Forum Scotland, which states that;

'Parents have been very clear to us in their opinion that the main role of teaching staff is to be engaged directly in educating children... the majority of parents who have engaged with us do not think that giving schools more accountability would improve performance and are concerned that the additional financial and legal responsibilities would exacerbate the head teacher shortage'

Parents sit on many local authority Education Committees and, in the majority of local authorities, local councillors attend parent council meetings at some level. Parents seem to feel that local authorities are accountable and understand the local issues within the wider social environment that each school sits, and are sensitive to the demands of their area. This is not to say that they do not feel frustrated by the failure to change or change at a required pace. However, the response by parents appears to be unconvinced that the failure to see required improvement is solely the fault of local authorities.

Finally, in the absence of a strong case for the radical reorganisation proposed in the consultation, we do not believe that the important principle of local democratic accountability of locally elected members of local authorities, should be undermined or replaced.

Throughout the last century it has been accepted that the oversight and management of the school system should be a local matter (Fairley 1998). Education has come to be regarded as the core service delivered by local government.

In short, there is scant evidence to suggest that departing from the current model would contribute in any meaningful way to narrowing the gap in educational attainment (Lord 2012) and nothing in the OECD report to suggest that reform of the type mooted in the consultation document or in statements by senior government ministers is either desirable or necessary.

Question 2

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

We do not believe the current governance arrangements are the barrier. A focus on supporting the arrangements to work by local authorities and their national and local partners could be sufficient to achieve the vision.

However, we are concerned that the Scottish Government's emphasis is far too narrow, focusing almost exclusively on what goes on within the school gates rather than taking a more holistic approach that acknowledges the role of the school within its local community and that the most important factor in unequal educational attainment concerns early experience and the home learning environment.

We know that children from poor backgrounds face much less advantageous 'early childhood caring environments' than children from better-off families. Differences in children's and their mothers' health and wellbeing (e.g. birth weight, breastfeeding and maternal depression); family interactions (e.g. mother-child closeness); the home learning environment (e.g. reading regularly to the child); and parenting styles and rules (e.g. regular bedtimes and mealtimes) all conspire to cement disadvantage and create the conditions which allow the attainment gap to develop (Dearden 2014).

Children in Scotland's extensive experience in this field tells us that a child's experience of care and associated social and cognitive development, and particularly their ability to form relationships, will have a profound and lasting impact on their expectations and life-chances (Childcare Commission 2015).

If we are to achieve the meaningful change desired and eliminate the attainment gap, we need to support families more effectively and ensure that all children get the best 'inputs' in early life, irrespective of whether their parents are able to provide them (Demie 2015). This should include action to support families to engage in their child's learning - learning at home as well as in early years settings (Desforges 2003).

In line with GIRFEC principles, it is essential that we look at the whole family and the context of their local community, driving improvements across the range of services delivered at a local authority level that are effective in supporting children and families experiencing socio-economic disadvantage; including housing, health and social care, community learning and development and economic development (Joseph Rowntree Foundation 2014).

This being so, any governance proposal must take into account the context within which local authorities are operating and the funding pressures they face in delivering and commissioning the high quality essential services upon which the most vulnerable families rely.

We believe strongly in the powerful capability that good schools, staffed by highly qualified teachers, led by skilled head teachers and with effective partnerships in place, have in counteracting the effects of inequalities in family backgrounds and

home environments (Sutton Trust 2013), and it is absolutely correct that schools should be able to make the type of decisions that they feel would benefit their pupil's learning and support a child's cognitive development. It is not clear why they may not be doing this and no evidence is provided to suggest that local authorities are constraining them or not supporting them. It would be helpful to understand the barriers in Scotland to ensure accountability arrangements do ensure that every school does take responsibility for its role in tackling inequalities.

Evidence tells us that the kind of school based interventions that are most effective in narrowing the attainment gap relate to effective parental involvement programmes, high quality pre-school education and empowering children from deprived backgrounds to believe that his or her own actions make a difference, to feel school is worthwhile, to encourage them to believe in their own abilities and feel that they are in control of the things that happen to them (Joseph Rowntree Foundation 2014). Indeed, our own independent qualitative research that accompanied this response closely mirrored these findings.

It is entirely appropriate and correct that the professionals working directly with children are best placed to make judgements and decisions on how these types of support may be delivered. However, there is no evidence to support the view that it is the local authority's role in the education system that stands in the way of such decisions being made.

Question 3

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

Children in Scotland broadly agrees that the principles outlined in the consultation document should underpin the Scottish Government's approach to delivering excellence and equity in Scottish education.

However, we believe the Scottish Government could go further still by committing itself to taking a child rights focus to reform, with explicit reference to how any proposed reform will support the Scottish Government's commitment to children's rights as laid out in the UN Convention on the Rights of the Child.

One other important principle that we believe should be included is that of accountability.

Creating a culture of personal accountability and holding others to account in a consistent and transparent way is one of the most 'significant elements in securing and sustaining outstanding performance' (West-Burnham 2011).

The consultation documents states that 'schools should primarily be accountable to parents and their local communities'. Of course, teaching professionals in Scotland have a deep sense of *responsibility* towards pupils, their parents and the communities they serve, but they are not *accountable* to them in the truest sense of the word.

Instead, they are accountable to local authorities, the Scottish Government and other national agencies. Changing this arrangement by stripping local authorities of certain aspects of their responsibilities and devolving these powers to individual schools will require careful consideration and further consultation if it were to have the kind of positive effect desired and not be seen as being tokenistic.

As we have already highlighted, local authority oversight of education and the democratic accountability that is central to the concept of local government is an incredibly important feature of current governance arrangements.

Likewise, the range of bodies with formal roles in Scottish education (including early learning and childcare) such as the Scottish Government, Education Scotland, the Care Inspectorate, the General Teaching Council for Scotland and the Scottish Social Services Council, all have clearly delineated accountability functions within their own respective spheres and are each held accountable in their own way, with their duties, rights and obligations enshrined in statute.

Questions 4 and 5

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

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

It is entirely appropriate that the professionals who work directly with children are able to make the type of decisions that they believe will support their pupils' learning and encourage them to get the most out of their time at school.

The vast majority of these decisions are currently taken at school level, and as no examples are cited in the consultation document, we are unclear of the type of decisions that the Scottish Government believes schools are being precluded from taking within the current governance framework.

At present, head teachers are responsible for the day-to-day implementation and management of the curriculum, decisions on how to meet the needs of individual learners are made within the classroom and schools are free to set out their own strategic direction, including deciding on how they may collaborate with other schools and outside organisations in order to meet the needs of their pupils.

The consultation document posits the view 'decisions about children's learning and school life should be taken at school level'. However, it should be noted that reaction to this proposal (mooted in the policy paper Devolved School Management Review (2012)) was described by Reform Scotland as being 'decidedly lukewarm'.

As mentioned above, it is not apparent what are the risks and benefits of devolving a greater degree of responsibility from local authorities to schools, both in terms of the impact that this may have on teacher capacity as well as on pupils.

There is an assumption in the consultation document that all teachers, and particularly head teachers, will have the necessary training, capacity and indeed desire to take on greater responsibilities that are unrelated to teaching practice and more focussed (as it appears from the consultation document) on financial management, budgeting, procurement, service provision and human resources.

A note of caution has been sounded by leading educationalist Professor Mark Priestley (2016) in response to the Governance Review consultation, when he stated that 'simply granting autonomy to schools is problematic'. He cites teacher training and capacity building, access to adequate resources and input from external agencies as pivotal to the success of such an approach.

If such a course was to be embarked upon, then it would need to be supported by the provision of relevant training and CPD activity in order to ensure that teaching staff are suitably prepared and sufficiently skilled to exercise any new responsibilities. As mentioned above, is this the best use of our teachers' time and resources?

We also have regard to the response of Educational Institute of Scotland (EIS), which states that it 'is not convinced about the benefit of the proposed extension to schools of responsibilities that currently sit with local authorities', believing the move to be 'either potentially tokenistic or an unnecessary imposition of additional bureaucratic layers to school operations'.

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?

Role of young people in decision making

Children in Scotland welcomes the Scottish Government's commitment to gathering the views of children and young people on this review through the excited.ed project, undertaken in partnership with Young Scot and the Scottish Youth Parliament.

However, the consultation document itself presents a disappointing lack of analysis on how our schools can become more effective in creating successful learners and fails to acknowledge the fact that it is young people themselves who are absolutely at the heart of any discussion as to how we promote excellence and equity in Scottish education.

As is highlighted in the consultation response of the Royal Society of Edinburgh (2017);

‘the review document tends to treat learners as a product of the system and passive recipients of its output as opposed to them being the central actors. It will be important that the role of young people in relation to empowerment and decision making is recognised in the review to ensure that any structural changes are made in the best interests of learners’.

Children in Scotland concurs with this position, believing that the views of young people should be front and centre in this debate. Key areas of focus should include;

- empowering all young people to realise the ways they are already making decisions that impact on themselves and others
- supporting young people to feel more confident in their decision making, for their studies and in life generally
- closing the decision making loop for children and young people.

Children and young people want to be more involved in the decisions about their own learning and individual support. They recognised the wide variety of reasons children and young people may need support in an educational setting, the wide variety of ways of supporting children and young people and the barriers to this support young people may experience. Schools need to take note of this and work hard to engage with all children and young people.

Personalisation is one of the 7 curriculum principles and yet, our work with Leaders of Learning shows that there is considerable progress still to be made. We note that it is not mentioned in this consultation. If this consultation is about children and young people rather than structural and political concerns, then we need to re-engage with the key task – strengthening the capability of our education system to nurture successful learners.

Therefore, our schools are ultimately accountable for creating the conditions for successful learning by:

- Motivating young people to become lifelong learners
- Developing a personalized service
- Improving basic skills and extending higher order skills
- Making sure the teaching is engaging. Giving breadth and depth to the curriculum.
- Aligning knowledge, understanding and skills

Ensuring all children and young people are supported to achieve this (including those seldom heard, those with additional support needs) will be challenging and will need significant time, money and training invested in it.

Underpinning every aspect of the school culture with an understanding of GIRFEC principles and of the school’s role in securing the health and wellbeing needs of each of their children.

Parents

Although we support the current parent council structure, we feel that schools must do more to involve a more diverse range of parents within school decision making processes, particularly parents from socially deprived backgrounds, and those who have children with additional support needs.

According to research conducted by NPFS with 502 respondents to inform the review of the Scottish Schools (Parental Involvement) Act 2006, parents and carers living in deprived areas are less likely to feed back to the school through formal means (5% of parents living in the most deprived areas would feed back this way compared with 20% in the least deprived areas).

Furthermore, those with a lower socioeconomic status are less likely to be interested in joining the Parent Council (52% of AB parents would be interested in joining, compared with 34% of DE parents), and are less likely to know what the Parent Council does (e.g. 32% of DE parents don't know if the Parent Council asks parent's views about what the children in the school are learning, compared with 17% of AB parents).

We support NPFS' call for the Scottish Government to work on projects and policies to break down barriers to involve these parents in school life. For example, in terms of accessibility we would like schools to have dedicated funds available to help encourage wider parental engagement by making it entirely accessible to the whole parent forum.

Our own work on Food, Families, Futures project illustrates how schools can work with community groups to engage meaningfully with families outside of formal decision making processes, including during holiday times, for the benefit of families, children and schools themselves.

Question 7

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

Our response to the Scottish Government's Blueprint for 2020: Expansion of Early Learning and Childcare addresses this question in detail (see <http://www.childrenscotland.org.uk/policy-and-research/previous-consultations>).

We wish to emphasise in this consultation that there is a significant and exciting transformation and expansion of early learning and childcare (ELC) underway in Scotland. By 2020, investment will equal that spent on the primary education sector. The benefits for children and their families are many. In the context of this consultation, we wish to stress the potential for addressing the equity gap in early literacy skills and in creating the foundations for successful learners from day one of primary school.

Expansion of ELC is closely aligned to embedding links with children's services across communities. Equally, if primary schools are to benefit from the improved learning outcomes, which we should see from expansion, then they need to work closely together. We do not believe this could happen effectively within regional groupings

given the range of other priorities, which the groupings would have. We are also concerned of the impact of disruption in education services which may detract from planning for successful expansion.

Question 8

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

We defer to the expertise within the education professional sector on this question.

Question 9

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

As recognised by the review, collaboration and partnership working are already strong features of Scottish education.

There is a broad range of cluster activity operating throughout Scotland, some based on informal connections among local schools, while others have more a more formal basis, such as those which share funding in order to achieve specific objectives or deliver specific projects.

There can be no question that clusters provide an effective means of enabling schools to pool resources, including teachers, particularly in shortage and specialist subject areas. However, while they may confer cost benefits – they should not be driven by this imperative, their focus must be on improving outcome for learners and increasing the opportunities available to children and young people.

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.

See below

Question 11

What factors should be considered when establishing new educational regions?

Any new regions must be coterminous with other structures which are responsible for any children and family services. Educational provision cannot stand apart from wider community planning and service delivery for children and their families. As emphasised above, if the government is to secure its ambitions for excellence and equity, it would be folly to reinforce structural barriers to integrating children's

services – the fundamental premise on which GIRFEC and curriculum for excellence is built on. We are concerned at any further additional tier of interaction, undermining local democracy and existing accountability structures.

This is not to say that regional working is not worth exploring in order to meet certain objectives that lend themselves to such an approach, such as the sharing of staff or resources and facilitating opportunities to share good practice or engage in professional dialogue and development.

Likewise, in areas where a lack of personal or financial resources mean that provision is poor, local authorities should be encouraged and supported to explore regional solutions. This is particularly true in areas such as ASL and Gaelic Medium Education. Equally, given the financial pressures faced by local authorities, an escalation of shared services; more formal structures to share specialist staff; peer support etc, must be introduced and we call on local authorities to deliver this. The Highland grouping around education is one example.

Question 12

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

There are already a sufficient range of services and support functions delivered at national level, including Initial Teacher Education (ITE), school inspection, workforce planning, teacher registration, standardised assessments, national qualifications and teaching staff terms and conditions.

If the overt theme of the Governance Review is about empowering local communities, we do not believe that the argument for further centralisation can be made.

Question 13

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

We believe this question is adequately addressed in Teaching Scotland's Future (Donaldson 2010), which established the blueprint for improving teacher education at every stage of their professional career.

It was greeted enthusiastically and recognised as a potentially transformative report. While there has been some progress, we believe the recommendations should be reviewed, refreshed where necessary (for example, in relation to addressing both needs of children with additional support needs, and working in partnership with other professionals, volunteers, third sector and parents) and then focus on delivering and implementing these.

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?

Yes in principle. However, we think more information should be provided on the purpose, benefits and disadvantages of the current funding formula and the effects and impacts of changes.

Question 15

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

It is our understanding that around 85% of local authority funding for schools is devolved to schools. While this may vary across Scotland, there is insufficient evidence available to know whether this is about right or it should be more or less.

A substantial cut to authority-wide functions, such as the employment of educational psychologists, speech, language and communication therapists and other joint NHS health and well-being services, community learning and development, parental and third sector partnerships for schools, would be disastrous. An element of education funding must be retained at local authority level for these vital functions.

We also question what are the local authority controls over funding, which it's claimed, prevent schools deliver more effectively. If the controls are unnecessary bureaucratic burdens, then these should be removed.

However, as the vast majority of funding is spent on teaching staff whose terms and conditions of employment are determined nationally, then the room available for schools to do more with devolved funding appears limited.

Question 16

How could the accountability arrangements for education be improved?

Our response to the above questions and our opening comments have addressed this question.

Question 17

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

No.

**CHILDREN IN SCOTLAND
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