



**Post-School Education
and Skills Reform:
Consultation on
legislation
Sept 2024**

UNISON is Scotland's largest trade union with more than 150,000 members across the public, private and voluntary sectors. Of particular relevance to this consultation we are the main union at Skills Development Scotland and members involved with student support and funding at colleges across Scotland. This response is based on their insights and experiences

Q1. Which of the three proposals do you prefer?

UNISON Scotland prefers Option 1 – the status quo as being the structure that will work best for learners and employers and think that any reform should proceed withing that framework.

Q2. What do you think are the main advantages of your preferred proposal?

It avoids disruption. It is important to remember that reform is not simply a matter of transferring finance.

The SDS Apprenticeship team for example have built up relationships with industry and colleges, visit schools. College finance staff deal face to face with students.

Currently, SDS appears to be better equipped than other organisations, to support both funding and delivery of Modern Apprenticeships.

SDS has a unique expertise on the above areas; staff experience, partnership working, data and insight and organisational expertise, all critical for a successful funding an Apprenticeship model. It is important to remember that reform is not simply a matter of transferring finance.

In the context of colleges, where UNISON has many members directly involved in supporting students; it was felt by our members that Proposal One avoids the potential loss of personal support provided to students, and often their parents, on a one-to-one basis. A large number of the FE cohort require additional support to access funding. There has been an upsurge across the sector of students applying to college who go on to declare an additional support need, and that the one-to-one support offered by funding staff is increasing and likely to increase further in coming years. Removal of this support will immediately place a barrier and will work against current Widening Access initiatives. This one-to-one support that funding staff provide, is

more detailed in focus than guidance staff can provide, due to the detailed knowledge held by funding staff.

Amongst Further Education Staff the main concern was that any move to the SFC would impact negatively on the amount of funding available for Modern Apprenticeships. There were fears a new system may weaken the partnership between colleges and employers, weakening college's ability to be flexible to local needs.

SDS have information on every young person as Labour market and skills gap information. This allows for a strategic approach; another agency would be operating in the dark.

It is worth pointing out that none of the options presented can be accurately described as implementing the recommendations of the Withers Review. They were for an entirely new funding body – as opposed to a rearrangement of responsibilities amongst existing bodies.

Q3. What do you think could be the biggest challenges with your preferred proposal?

There are no new challenges in this approach. There are current and ongoing challenges of staff delivering a service with diminishing resources. This is the case both in SDS and in Further Education.

Q4. Are there any other factors you think we should consider in making a decision?

"There is also evidence of a perception of apprenticeships as being detached from the rest of university and college learning." (consultation document p23)

This statement is disingenuous. Modern Apprentices are employed, albeit on sometimes very low wages, but their continued employment is dependent on them achieving at college. It is not that they are detached it is that they have a unique status within learning institutions. We would argue that the drivers for changing any such perception lie in affording MA's the same status and access to support within colleges that full time students get.

"Bringing provision funding into one place would allow for greater flexibility, not only within the apprenticeship family, but across all provision. If one organisation was responsible for all provision funding, this would allow changes to be more easily and regularly made to the benefit of learners, institutions and employers." (consultation document p23)

This assertion is made – but neither evidence nor modelling is presented for it.

It is noted that SFC funding for modern apprenticeships is "not widely known". This is an argument for publicising and promoting SFC involvement, not for disruption.

SDS staff currently monitor and evaluate equalities outcomes, and we are doubtful this level of information could be acquired from Further Education Scotland. Indeed, the level of information that can be gleaned from FES in general can give cause for concern. It was also noted that the move creates a 'single point of failure' which could impact all post school education funding.

In relation to shifting all responsibility to SFC we believe tagging on more work to an organisation with little or no experience of in-work training seems like a recipe for disaster.

Colleges are currently paid via SDS for MA's and also very often receive a credit allocation, which helps with the cost of delivery. There is a serious prospect this income will be lost with a detriment to colleges and their ability to deliver programmes.

We would urge that the example of the move of FA provision to the SFC. This brought a change in payment to core credit allocation resulted in internal 'battles' with faculties to try and get the credits required to deliver FA's. FA provision across the sector had reduced drastically after this move and we have concerns the same will happen with MA's.

Our members are sceptical that it would be sensible to give SAAS a greater role. Their experience is that SAAS is routinely late with its policy and allocations for HE students in FE colleges, and consistently fails to meet the needs of HE students in FE colleges who often struggle to get funding in place before the start of their courses. SAAS are a small organisation who specialise in HE funding and do not have the knowledge base required to deal with FE funding, They are perceived as being overworked and unresponsive – students are often unable to contact them when they need to. This is where the frontline support in colleges is critical. Often college students come from poorer demographics and delays in funding can be catastrophic.

We disagree with the assertion that *"the changes proposed, in isolation, are unlikely to have a significant impact on organisations such as universities, colleges or training providers"*. (consultation document p22)

We have a concern that a move to the SFC will impact negatively on the amount of funding available for MA's. A new system may weaken the partnership between colleges and employers and that the move would cut college's ability to be flexible to local needs.

The consultation document lacks detail in almost every respect and appears to give no consideration as to how the current process will be perceived by staff.

Downplayed to the point of being completely ignored is the idea that face to face delivery of services and relationship building by staff with learners and learning providers is of any value at all.

College staff are on hand in times of crisis for students, often making same day payments; including processing of course changes, engagement and attendance, early leaver and stopping payments. All done in-house and quickly, providing an early intervention that can save the public purse. Additionally, this financial intervention often leads to the provision of further support services within the colleges to enable students to continue their educational journey; for example, a discussion around attendance may highlight an issue in the student's life which allows the college to fully support that student, and signpost if required. It was strongly felt that SAAS would be unable to provide such a responsive service.

The Independent Review of Student Finance (the Gadhia Review) is cited in support of change, Our experience of this review was that however well intentioned those involved were ill-informed; with little understanding of the differences between statutory funding and discretionary funding; and there was no way to address the issues with Educational Maintenance Allowance (EMA).

Q5. Should the 2005 Act be amended to remove the restrictions in respect of Board appointments?

Yes, there should be far greater trade union representation on the SDS Board and on other Boards throughout the public sector.

Q6. If SFC takes on responsibility for all apprenticeship funding, what additional skills, knowledge and experience should be considered for SFC Board members?

n/a

Q7. Do you have any other comments or suggestions for governance of the SFC Board or other aspects of SFC governance?

n/a

Q8. Do you think we need to introduce new duties on organisations receiving public funding to provide better information to SFC?

No

Q9. Do you think there is a need to strengthen existing systems and processes for collecting data? If your answer is yes, then please explain why the data is needed.

We are confident that the information available currently is comprehensive and have grave concerns that a fragmentation would interfere with that.

Q10. Do you think there is a need to strengthen existing systems and processes for reporting and publishing data? If your answer is yes, then please explain the purposes for which you or others might use the information.

No. Existing data gathering and publishing systems are robust and comprehensive. SDS has, uniquely, access to gather information on all young people in Scotland.

Q11. What information about funded organisations would you most like to know and why?

The most important information would be information convincingly showing that they are capable of taking on and delivering services to the high Standard that currently exists. So far none has been presented.

Q12. What, if any, additional powers should SFC have in order to help ensure the post-school education and skills system operates effectively?

As explained above – we don't think they should.

Additional Comments

Since the transfer of the Employability Fund from SDS to local authorities there is a strong perception that the quality and suitability of provision has diminished. This has led us to the conclusion that not all change is necessarily beneficial and can have a detrimental impact on both service and outcomes.

It is critical under Fair Work that employees and trade unions have an effective voice. We feel this could be jeopardised if the proposed changes are implemented without sufficient consultation and agreement.

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