

EMPOWERING SCHOOLS:

THE HIGHLAND PARENT COUNCIL PARTNERSHIP RESPONSE TO THE CONSULTATION ON THE PROVISIONS OF THE EDUCATION (SCOTLAND) BILL

29 January 2018

About the HPCP

The Highland Parent Council Partnership is a Charity that aims to provide a representative collective voice for all Parent Councils and the wider Parent Forum across Highland. In preparing this response the HPCP has requested input from every school Parent Council or equivalent in Highland (over 200 in all), and encouraged each one to submit its own response independently. This response is the synthesis of a very large number of inputs.

A Respondent Information Form is being submitted as a separate document (but in the email containing this submission) to meet the requirements of the Scottish Government.

Response Components - Narrative Comments and Question by Question

The questions posed in the consultation document are restrictive, missing some points of immense importance entirely, and give the clear impression that the consultation intent is only allow for trivial “tinkering around the edges”. The Online submission system constrains responses to the set questions and is not an adequate option to meet our needs in responding to the consultation. The response below therefore starts with a narrative that broadly follows the structure of the consultation but is not constrained by the specific questions asked. The second part covers the questions in order. **Both parts are integral to the response and must therefore be considered together.**

General Points

As this response is the synthesis of many different inputs gathered from a large number of Parent Councils representing thousands of Parents, it includes a range of positions.

These shades of opinion are not contradictory but rather reflect the reality that:

- Much of the consultation document “Empowering Schools” was written in language that many Parents reported finding variously imprecise, vague, confusing, technical and often contradictory.
- Variations in Parents’ own experience and perspectives mean that personal and local factors strongly influence the views expressed and the reasons behind them.
- Hugely different responsibilities apply to Head Teachers (HT) according to:
 - the type of school they lead (Primary, Secondary, clustered etc);
 - the state of the school facilities (old, new, Private-Public Partnership, campus, fit-for-purpose, etc);
 - school roll (varying in Highland from under 30 to over 1200);
 - their own experience as HT (not just time in post), and their competence in the HT role.

- Inevitably these factors affect Parental views on the local status quo and to what extent the proposed legislation will affect outcomes and effect positive change.
- It should be noted that opinions varied as to whether a HTs' Charter was needed per se or whether the intended elements could be achieved by better management without the need for a Charter backed by Legislation.

Strategic Issues

The Consultation document demonstrates a concerning lack of understanding of the reality on the ground for most schools, HT and Parents in Highland. Its central premise - that the proposed Legislation will deliver improvements in how education in Scotland is managed and delivered at the front line - is not underpinned by the evidence offered and appears fundamentally flawed in approach.

The proposals regarding the creation of an Education Workforce Council for Scotland do appear workable and may have some benefits in consolidating a number of different schemes.

However, the majority of the proposals, if enacted, would introduce significant and unnecessary additional bureaucracy, and result in fragmentation of governance, not least by complicating alignment of governance for the multiple and cross-supporting children's services – services that must dovetail precisely with education to be effective.

The proposals offer a muddled picture of responsibility for Finance and Human Resources, and no clarity as to which parts of the proposed Regional Improvement Collaborative (RIC) actions and duties will be overseen by Local Authorities (LA) or Education Scotland. Furthermore, the proposals comprehensively fail to identify the costs of those additional layers of bureaucracy, even at the 'rough order of magnitude' level. Nor do the proposals specify how the additional regional and national functions will be resourced against the backdrop of an already impossible resourcing problem for Highland (and many other LA).

Fundamentally, the Consultation Document reveals that there is no fundamental *requirement* for a HTs' Charter or the proposed RICs, and results in the overall conclusion that the Scottish Government could abandon the proposed Education Bill in favour of *targeted amendments* to existing legislation covering the valid points contained in the proposals. In short, a new Charter is not the only way to empower HTs.

Whilst it can be accepted that the proposed changes are broadly well-intentioned, none will do anything of significance to rectify the key issues affecting Education in Scotland, namely:

- The severe lack of trained teachers, coupled with poor retention of serving teachers;
- The chronic and enduring underfunding of Primary and Secondary Education in Scotland;
- Declining levels of performance coupled with a continuing contraction of subject choices at National 5 and above;
- The lack of a truly independent Inspectorate (i.e., one not a part of Education Scotland and one not beholden to the Cabinet Secretary for Education and Skills but rather reporting directly to the Scottish People); and
- The complete lack of any ability of Parents to enforce any direct governance of school leadership and management (i.e., through legally-empowered bodies such as existed under the old 'School Boards' system). Parent Councils have no Statutory Powers or Legal Rights of any significance, and any moves to further "empower" HT must not

proceed without a balancing, equally-effective and statute-based empowering of Parents, ideally through amendment of the Scottish Schools (Parental Involvement) Act 2006.

Erosion of Democratic Controls

At present, with no elected statutorily-empowered Parent bodies able to enact changes to school management policies by Right of Law, the only forms of democratic control over State Education in Scotland come via the LA (election of Councillors) and National Elections (of MSPs). If HT are empowered to determine the majority of key functions in schools (Curriculum, Pedagogy and Staffing), then there must be a concomitant and immediate adjustment to democratic controls that offer equivalent Statutory empowerment to Parents (and Pupils via their influence upon Parents), thus either a return to Statutory School Boards or an updated equivalent arrangement that can, where appropriate, over-rule a HT (or LA) decision by Right of Law. If this approach is not adopted then the proposed legislation will create a position where a HT could enact significant changes to curriculum, pedagogy and staffing in direct opposition to the wishes of Parents, Elected Community or Ward Councillors, and LA Officials, with no way for anyone to prevent those changes. This would inevitably be unacceptable to Parents and face continuing legal challenges, including on Human Rights grounds.

Lack of Need for the Proposed Education Bill

The Consultation document offers no clear rationale as to why the many proposed changes need to be achieved through a new Education Bill, as opposed to simply enforcing better management and governance within existing legislation and frameworks or via targeted amendments. For example, a “duty to consult” with Parents (and all other appropriate stakeholders) could be imposed upon all HT by every Local Authority - today - through normal management-process adjustment. LA can, through Parent Councils or by direct engagement, determine the extent to which Parents and stakeholders (including pupils) feel that consultation with their HT is both happening and effective. It is clear that in Highland the good HT (and their Deputes) consult extensively anyway, as a function of good leadership. Those that do not consult effectively are, in most cases, likely to be open to the process but not sufficiently skilled in its application or confident in their ability to manage it. They may need better training and mentoring on successful consultation as a function of leadership and management. However, no legislation is needed to achieve this, just a better programme of training for Deputes and HT, and improved mentoring, ideally including by people drawn from within the parental body. A fully-independent Inspectorate should have the power to order LA to address any such shortfalls in training or practices, and follow up with an enforcement re-inspection within 6 months.

The existing system of Quality Improvement officers already provides the core of an effective a method for ensuring adequate consultation with Parents and other relevant stakeholders. It needs better compliance monitoring both through LA and Inspectorate review and recommendations, but again the legislative basis does not need amending, but enforcing. One possible exception could be to require in Law that Parent Councils are formally consulted by the LA on school Improvement Plans, with a coherent consultation across the Associated School Group (ASG - all Primaries feeding a Secondary, plus that Secondary), and if needed all the ASG school plans then adjusted by the LA, prior to their final reissue.

Every leader, including a HT, is likely to want to build a team attuned to their vision and ethos. However, giving HT too much freedom over staffing decisions is likely to result in significant divergence of approaches both within and between LA areas, with concomitant potential for fratricide or poaching between schools. This is already an emerging issue in the current environment of critical staff shortages, especially in Secondary schools where STEM and ICT teacher numbers are significantly below the minimum required to meet the statutory requirements and deliver the CFE (curriculum). To some extent every LA, in consultation with its neighbouring LA, has to deal with the problem of balancing teacher supply and demand (or pain-sharing over gaps), and Parents will rebel against a system that enables one school to achieve full-staffing to the detriment of its neighbouring schools.

In Highland the good HT - in general - already get as much fiscal/resource autonomy as the LA can manage to give them, noting that many elements such as staffing costs offer little real opportunity for flexibility beyond determining whether posts are offered as full-time or part-time, adjusting the balance across the incremental scale, and the precise mix of teaching versus classroom support staff. As the main issue affecting recruitment is the lack of trained teachers to take available posts, especially at Secondary level, offering significant additional HT control of staffing decisions is likely to be the wrong fix for the wrong problem.

The absolute requirement to sustain what economies of scale can be achieved in terms of capital expenditure and infrastructure maintenance makes it unwise to universally devolve more spending to HT level, certainly for LA like Highland. The cross-cutting nature of much of the Additional Support Needs (ASN) provision (in Education, Early Years, general Social Services and specialists areas including mental health and educational psychology) must also be managed at LA level, albeit in full consultation with HT and Parents to ensure consistency of approach and avoid duplication of effort. Training HT and Deputies in the principles of good resource management is important, but once again, none of the above needs any legislative reform to be achieved.

Transparency

In terms of transparency, the Scottish Government needs to look at all areas of National and Local governance, and ensure that a principle of pro-active open publication of all non-commercial (or non-commercially-sensitive) data, proposals and plans, including those for schools is established, followed and rigorously enforced. That should be a statutory duty, aligned to meet any relevant provisions of the forthcoming EU General Data Protection Regulations (GDPR), but should apply to every area of National and Local Governance, and thus not sit within an Education Bill.

Parental Involvement

Whilst voluntary Parental involvement in schools via Parent Councils can be effective and successful, in many cases Parents are strongly deterred from such engagement by several factors.

- Firstly, as Parent Councils have no legal powers to force HT or LA to listen to them, never mind act on Parental direction, the vast majority of Parents see the existing Parent Council as either a talking-shop or just a fund-raising body. This is very strongly evidenced by participation rates – few Parent Councils get more than 5% of Parents attending meetings of any sort, and in Highland most Parent Councils struggle to get more than 20 Parents involved.

- Secondly, many Parents do not come to Parent Council meetings because they expect to then have to undertake arduous duties - tasks for which they feel unprepared, untrained, have insufficient time to perform, no interest in doing, and cannot see the value of doing as their efforts can simply be ignored by HT should the HT wish so to do. For the many Parents working long hours, or two or more jobs just to survive, even if they have the will to engage they often do not have the spare capacity to do so reliably.
- Thirdly, for many Parents their own schooling experience was not a happy one, and being back in school and dealing with teachers – even as an adult - is not something they enjoy, so will only do on occasional days such as Parent/Teacher Consultation evenings.
- Finally, a substantial majority of Parents believe that the running of schools, teaching delivery and the associated core funding are all matters best left to “the professionals”. This is not surprising as the mainstream media and the teaching Unions almost universally portray teaching as a demanding, complex and busy profession that makes great demands upon everyone involved in schools and education. This is a view that most people probably agree with, and with good reason.

Considering these four factors, it is highly unlikely that HT will be able to improve consultation with Parents on substantive matters of policy, improvement, or the curriculum in any meaningful way without a significant change in the motivation of Parents to become engaged. A key factor likely to motivate greater parental engagement in such areas is the offer of real and direct power over some decisions, which ultimately means Parents being able (in extremis) to over-rule HT and/or the LA through a process of direct or representative democracy within the school. As it is unlikely that a “one Parent, one vote” system could be administered sensibly for anything other than the most occasional and seismic decisions, the representative approach through elected Parent Councillors seems to offer the best option. Whilst this could be achieved by LA committing voluntarily to respect a Parent Council majority vote as binding, a reform of the Scottish Schools (Parental Involvement) Act 2006 should be enacted to give a quorum of Parents, or the extant Parent Council, the statutory power to put to a binding vote any substantive policy, curriculum or delegated resource question that was already in the gift of the HT or could reasonably be delegated from the LA without breaching other statutory provisions. One specific example of this could be to enable Parents to direct that more than 6 subjects are offered in the Senior Phase, and require the HT and/or LA to provide the necessary teaching and learning access (including via Virtual Classroom, e-Sgoil, etc) within the existing budget.

Any move to impose legal duties upon Parent Councils (as proposed regarding the Equality Act 2010) will prompt an immediate and wholesale exit by Parents from Parent Councils. Parents will simply not accept the imposition of legal duties upon them arising from membership of the Parent Council. Even if the kind of legal powers detailed above enabling Parents to force binding votes on key issues were established, the imposition of legal duties would introduce a substantial new disincentive to participation.

Pupil Involvement

Pupil involvement and participation of the kind envisaged in Chapter 3 of the proposals should be explicitly required (ie made mandatory) by all LA for all schools, with the details described fully in an updated HGIOS issued by Education Scotland, and checked through

both the annual school improvement process and the periodic checks by the Inspectorate. Parental and Pupil engagement processes, and success, should be critical factors within the formal assessment of a school's performance such that both aspects would have to be routine, deep, broad, effective and responsive to enable an overall grading of Good or above in the HGIOS rating system. These changes could be effected within existing provisions by Education Scotland.

RICs

Statutory RICs would be an unnecessary imposition that would add to bureaucracy, and in the case of the North of Scotland ("Northern Alliance" RIC) would have such a large geographic area of responsibility as to ensure that local accountability is wholly impossible. Rather than adding an additional and expensive layer, the duties of the LA Officers responsible for sub-Areas and Authority-wide management of education services should be changed to ensure appropriate and adequate collaboration and cooperation with neighbouring LA – essentially what has already been achieved by the voluntary cooperation achieved by the "Northern Alliance". Failure to adequately discharge these duties should be grounds for sanctions, including dismissal of Officers where failings have been repeated. The relevant elected members (nominally the education committee members) should be charged with the necessary oversight duties and with reporting back to their constituents. None of this requires either a RIC or new legislation, but Education Scotland should conduct annual monitoring exercises to confirm compliance and promulgate best practice, and at least every third year each Local Authority should be subjected to a deep and full audit of compliance in every aspect of Education provision, management and improvement, with COSLA involvement.

Education Workforce Council for Scotland - EWCS

Parents have little direct interest in the minutiae of professional registration schemes beyond the need to ensure (and thus be assured) that those engaged in education delivery are (and remain) suitably qualified and experienced people, whilst not unreasonably restricting entry to the pool of educators (eg for those arriving from overseas – it must not become a protectionist body). The fees charged should reflect the true costs, and require demonstrable value to be added to those registered (ie beyond mere granting of access to an employment pool). The EWCS must be able to receive confidential complaints from Parents (and Pupils) about any registered professional, with a view to investigation and, if a complaint is upheld, either permanent deregistration or temporary suspension of a registration pending retraining and recertification. This process would cover matters of professional standards and be separate to any accusations of criminal behaviour, ie matters Police Scotland would normally handle, but clearly Parents would expect the EWCS to take the latter under consideration where appropriate.

END OF NARRATIVE RESPONSE

QUESTION-BY-QUESTION RESPONSES

Question 1. The Headteachers' Charter will empower headteachers as the leaders of learning and teaching and as the lead decision maker in how the curriculum is designed and provided in their schools. What further improvements would you suggest to enable headteachers to fulfil this empowered role?

- *We are supportive of the principle that HT are the leaders of learning and teaching within the school - indeed, many HT in Highland have a degree of autonomy already, enabling adaptation to local needs.*
- *This has not required a HT's Charter to achieve and Parents in Highland have expressed a mixed view as to whether the HTs' Charter is required, or whether the same broad intent achieved by implementation of best practice without any legislative changes.*
- *Of greater concern is the situation with the national shortage of teachers, coupled with the responsibilities already placed on HT. Many HT are already working at capacity and any additional duties will affect their ability to perform their core role of leading on learning and teaching.*
- *Imposition of the additional duties and responsibilities proposed may, without a review of remuneration and career path, further deter applications to HT post. This is already an issue in Highland, where clustering is seen as a more sustainable model in smaller schools to alleviate this issue and attempt to address financial resourcing constraints.*
- *Parent Councils have no Statutory Powers or Legal Rights of any significance, and any moves to further "empower" HT must not proceed without a balancing, equally-effective and statute-based empowering of Parents.*

Question 2. The Headteachers' Charter will empower headteachers to develop their school improvement plans collaboratively with their school community. What improvements could be made to this approach?

- *Clarification in the definition of 'collaboration' is key in guiding this answer. We agree that the school improvement plan is an important document. Across Highland the establishment of Associated Schools Groups (ASGs) gives a local basis for these plans, adoption of best practice, and feeds towards the relevant 11-18 campus where a 3-18 campus is not available.*
- *We have concerns about the RIC being given executive powers rather than based on collaborative desire to improve attainment as there is a huge diversity of needs across the region.*
- *Many schools already engage with the Parent Councils to try and develop the plans – this is a function of parental involvement but the development must be based on academic standards primarily to meet CfE national standards. This should not become a 'postcode lottery'.*
- *The language used in any school improvement plan must be simplified and accessible to all parents and have clear SMART objectives (Specific, Measurable, Achievable, Realistic and Timely).*

Question 3. The Charter will set out the primacy of the school improvement plan. What are the advantages and disadvantages of this approach?

- *Whilst not directed by current legislation, we believe that our schools already follow this approach.*

- *If correctly adopted, then this is a good guideline for successful curriculum delivery; however if poorly written this would have a detrimental effect on educational outcomes for all pupils.*
- *Primacy in a Charter will mean nothing if the resources are not in place to enact improvements.*

Question 4. The Headteachers' Charter will set out the freedoms which headteachers should have in relation to staffing decisions.

- a. What are the advantages and disadvantages of headteachers being able to have greater input into recruitment exercises and processes adopted by their local authority?
- *HT across Highland already have engagement with the LA in recruitment processes which are at times hampered by LA HR resource and limited by the requirements of the law.*
 - *There should be some oversight by an appropriate review panel to ensure the appointment is in the best interests of the school community.*
 - *The 'back of house' functions (Facilities Management/janitorial services, catering, school office,) are equally important for the school community and HT should be allowed appropriate inputs into the appointment of these positions where possible.*
 - *The only disadvantage is the time resource required by HT to effectively contribute to these processes against current workload.*

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

- *Across Highland, the general view is that HT should have the ability to choose their team.*
- *There should be some oversight by an appropriate review panel to ensure that appointments are in the best interests of the school community, and if necessary to enforce an appointment that will challenge the HT and ensure continuous improvement and evolution within the school.*
- *However, set against a backdrop of the current national shortage of teachers, which already has a number of gaps across Highland in key subjects / age groups, particularly in STEM, in the real world HTs have ability to choose is more constrained by supply than any perceived lack of empowerment.*

Question 5. Should headteachers be able to decide how the funding allocated to their schools for the delivery of school education is spent? If so, what is the best way of doing this?

- *HT should have the maximum flexibility to decide how the funding allocated to their schools is spent.*
- *What often prevents local flexibility (and sometime thus real value for money) are LA processes with preferred contractors across the region and higher volume seen as more cost effective.*
- *Additionally in terms of estate management in particular, older school infrastructure can be more costly to upkeep / repair and this cannot be blamed on individual HT.*
- *There are also wide-ranging concerns that within the boundaries of GIRFEC the provision of ASN practitioners must be correctly resourced, otherwise there is a risk*

that those with additional needs could prove disruptive / detrimental to the class as a whole.

- *In practice, staffing budgetary control is a big responsibility and without suitable support structures and appropriate training we believe many HT would not wish to be held to account on more budgetary matters.*
- *Currently, due to the resource allocation structure of annual budgetary settlements, there is no ability to plan strategically over a minimum 3 or 5 year cycle, which is a process seen in other governmental departments and UK-wide.*

Question 6. How could local authorities increase transparency and best involve headteachers and school communities in education spending decisions?

- *We believe Highland Council needs to engage more, and earlier, with HT and the community in making difficult spending decisions, including on proposals to merge, cluster, consolidate or close schools.*
- *This should include full publication of all proposals from the scoping stage: what goes to elected members should also be available to Parents and everyone else.*
- *With the pressures on LA budgets, major education spending options/decisions should be offered through a public consultation.*
- *Note on Highland Council budgetary and resource constraints:*
 - *Care and Learning accounts for approximately 2/3 of Highland Council's budget; however this is being stretched considerably. The wider impact of austerity and budgetary restraint is leaving gaps in service provision.*
 - *Without resource shortages being addressed appropriately, particularly given the vast geographical and small school constraints of our diverse community, we are particularly concerned that models that work in smaller regional collaborations are simply not viable / practical for our region.*
 - *Nor are we convinced about the practicality of the proposed RIC across the Northern Alliance – "one size certainly does not fit all".*
 - *Fundamentally the proposals do not address the issues that currently concern us: staff reductions and staff shortages (including supply teachers), availability of subject choices, the real effect of core budget cuts, and bureaucracy-induced workload which is increasing beyond capacity even before the proposed additions are considered.*

Question 7. What types of support and professional learning would be valuable to headteachers in preparing to take up the new powers and duties to be set out in the Headteachers' Charter?

- *That which ensures their ability to discharge these responsibilities efficiently, effectively and competently.*

Question 8. Are the broad areas for reform to the Scottish Schools (Parental Involvement) Act 2006 correct?

- *Parental involvement in schools via Parent Councils can be effective and successful, but in many cases parents are strongly deterred from such engagement by several factors which need to be addressed by changes to the Scottish Schools (Parental Involvement) Act 2006.*
- *Parent Councils have no legal powers to force HT or LA to listen to them or act on Parental direction. This must be changed to give Parents real powers to both*

restore the balance and increase the motivation for participation, currently eroded because:

- Most Parents see the existing Parent Council as either a talking-shop or just a fund-raising body. This is very strongly evidenced by participation rates – few Parent Councils get more than 5% of Parents attending meetings of any sort, and in Highland most Parent Councils struggle to get more than 20 Parents involved.*
 - Many Parents do not come to Parent Council meetings because they expect to then have to undertake arduous duties for which they feel unprepared, untrained, have insufficient time to perform, no interest in doing, and cannot see the value of. For the many working long hours, or two or more jobs just to survive, even if they have the will to engage they do not have the spare capacity to do so reliably.*
 - For many Parents their own schooling experience was not a happy one, and being back in school and dealing with teachers – even as an adult - is not something they enjoy.*
 - A substantial majority of Parents believe that the running of schools, teaching delivery and the associated core funding are all matters best left to “the professionals”, a not unreasonable view that most people probably agree with, and with good reason.*
-
- Considering the above, it is highly unlikely that HT can improve consultation with Parents on substantive matters of policy, improvement or the curriculum in any meaningful way without a significant change in the motivation of Parents to become engaged.*
 - A key factor likely to motivate greater parental engagement in such areas is the offer of real and direct power over some decisions, which ultimately means Parents being able (in extremis) to over-rule HT/LA through a process of direct or representative democracy within the school.*
 - As it is unlikely that a “one Parent, one vote” system could be administered sensibly, the representative approach through elected Parent Councillors seems to offer the best option.*
 - This could be achieved by LA committing voluntarily to respect a Parent Council majority vote as binding, but a reform of the Scottish Schools (Parental Involvement) Act 2006 should be enacted to give a quorum of Parents, or the extant Parent Council, the statutory power to put to a binding vote any substantive policy, curriculum or delegated resource question that was already in the gift of the HT or delegated from the LA. One specific example of this could be to enable Parents to direct that more than 6 subjects are offered in the Senior Phase, and require the HT/LA to provide the necessary learning access (eg via Virtual Classroom, e-Sgoil, etc) within budget.*
 - Any move to impose legal duties upon Parent Councils (eg under the Equality Act 2010) will prompt an immediate and wholesale exit by Parents from Parent Councils.*
 - Parents will simply not accept the imposition of legal duties upon them arising from membership of the Parent Council. Even if the kind of legal powers detailed above enabling Parents to force binding votes on key issues were established, the imposition of legal duties would introduce a substantial new disincentive to participation.*

Question 9. How should the Scottish Schools (Parental Involvement) Act 2006 be enhanced to ensure meaningful consultation by headteachers with parents on substantive matters of school policy, improvement planning and curricula design?

- See response to Question 8.
- Additionally, consultation is only possible where parents are willing to engage. However to facilitate parental engagement with substantive matters all consultation should be presented in language and terms readily accessible to all.

Question 10. Should the duties and powers in relation to parental involvement apply to publicly funded early learning and childcare settings?

- See response to Question 8. In principle it is right for Parents at all levels/stages to be involved, but ensuring informed engagement will require a great deal of effort and require further resources.

Question 11. Should the Bill include a requirement that all schools in Scotland pursue the principles of pupil participation set out in Chapter 3? Should this be included in the Headteachers' Charter?

- Pupil involvement and participation of the kind envisaged in Chapter 3 of the proposals should be made mandatory by all LA for all schools, with the details described fully in an updated HGIOS issued by Education Scotland
- Progress and participation levels should be checked through both the annual school improvement process and the periodic checks by the Inspectorate.
- Pupil (and Parental) engagement processes, and success, should be critical factors within the formal assessment of a school's performance such that both aspects would have to be routine, deep, broad, effective and responsive to enable an overall grading of Good or above in the HGIOS rating system.

Question 12. What are your thoughts on the proposal to create a general duty to support pupil participation, rather than specific duties to create Pupil Councils, committees etc...?

- We support the need for a general duty to support pupil participation rather than being prescriptive on specific duties. See also response to Question 11.

Question 13. Should the Bill include provisions requiring each local authority to collaborate with partner councils and with Education Scotland in a Regional Improvement Collaborative?

- The extant Northern Alliance informal collaboration arrangements between partner councils functions well on a voluntary basis, and already effects improvement of attainment and sharing best practice.
- We have real concerns about the effectiveness of an imposed RIC - of the size and nature proposed for our area - as a legislated body. There are already many conflicting priorities between schools in the Highland area and this would only increase across the wider RIC.
- We have significant concerns about the introduction of this legislation, but without greater clarity of proposals and the associated costs of introduction are unable to offer more specific comment.
- A duty to collaborate is encouraged (and already implied in existing legislation); we believe this is achievable without the creation of the RICs.

- *There has also been no meaningful consultation on their establishment prior to implementation; the existing consultation appears to see RICs as a fait accompli and not a proposal.*
- *There could also be mismatches (scale, needs and resources) between the bodies providing policy direction and the funding that may be required to deliver improvements. The fundamental budgetary settlements limit the ability to address this across the Northern Alliance RIC.*

Question 14. Should the Bill require each Regional Improvement Collaborative to maintain and to publish annually its Regional Improvement Plan?

- *Annual feedback on progress measured against a realistic, achievable National Improvement Framework should be published.*
- *This could be better measured with a LA improvement plan (particularly in the case of the Northern Alliance RIC) vice the proposed RIC-wide Regional Improvement Plan (RIP).*
- *With suitable resourcing the LA Improvement Plan should be enacted over a 3-5 year cycle, updated every 2 years but reviewed at least annually.*

Question 15. If we require Regional Improvement Collaboratives to report on their achievements (replacing individual local authority reports), should they be required to report annually? Would less frequent reporting (e.g. every two years) be a more practical and effective approach?

- *Parents are fundamentally concerned with the issues that affect achievement of their children. There is a risk that reducing the frequency and coverage of reporting, especially in the case of the Northern Alliance, the detail could be lost and we would see average achievements as a benchmark. This is currently a criticism of the reporting metrics used by LAs to show where improvements occur.*
- *At the same time, any change requires a suitable period of adjustment to show improvement, indeed CfE has not yet seen the initial entry cohort reach graduation – the many concerns reported around CfE framework and attainment already risk ‘a lost generation’ in Scottish Education.*
- *Therefore, see our response to question 14. Our young people do not have time to wait; often the answer is “improvements are on the way” but if we have to wait 3 years to see what has happened it is too late for many pupils to make the necessary choices.*

Question 16. In making changes to the existing planning and reporting cycle, should we consider reducing the frequency of national improvement planning and the requirement on Ministers to review the National Improvement Framework?

- *We think that national improvement should be planned in the context of a medium- to long-term view as detailed in Q14 and Q15 responses.*
- *All reporting and improvement planning needs to be conducted in a coherent timescale.*

Question 17. Are the proposed purpose and aims of the Education Workforce Council for Scotland appropriate?

- *We believe the defined purpose and aims are broadly appropriate.*

Question 18. What other purpose and aims might you suggest for the proposed Education Workforce Council for Scotland?

- *Parent Councils do not have the experience to answer all the questions from 18 to 24 in detail. However, the EWCS must, as proposed, be independent of Govt and political interference, but equally must not become a protectionist body, so therefore must not be headed by a teaching professional.*
- *The applicability of the EWCS system as proposed appears reasonable.*

Question 19. Are the proposed functions of the Education Workforce Council for Scotland appropriate?

- *See narrative response.*
- *The EWCS would offer an excellent body for identifying and spreading best practice across all registered education professionals.*

Question 20. What functions might you suggest for the proposed Education Workforce Council for Scotland?

- *See narrative response.*

Question 21

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

- *See narrative response.*

Question 22. Should the Education Workforce Council for Scotland be required to consult on the fees it charges for registration?

- *Yes.*

Question 23. Which principles should be used in the design of the governance arrangements for the proposed Education Workforce Council for Scotland?

- *See narrative response. Must be an independent body.*

Question 24. By what name should the proposed Education Workforce Council for Scotland be known?

- *No comment.*