



Memorandum of Comments
by EIS-FELA
on
the Independent Commission on the College
of the Future

The EIS is the largest education union in Scotland with over 60,000 members including over five thousand members in Further Education Colleges and around fifteen hundred members as academics and academic related staff within Higher Education Institutions across Scotland.

The EIS Further Education members form a Self-Governing Association called the 'Educational Institute of Scotland Further Education Lecturers' Association ('EIS-FELA') with its own Executive to determine EIS Further Education policy. It is the sole recognised union for representing lecturing staff within the sector.

The EIS-FELA welcomes the opportunity to comment on the consultation document considering 'The College of the Future' and has the following comments to offer:

1. Theme One – Role, Scope and Focus of Colleges: an essential service to people and employers in every community

(a) What should the balance be between a college's local, regional, national and international roles? How can we best achieve effective strategic alignment between these roles?

The EIS-FELA believes that colleges are central to providing access to education for all; with the delivery of high-quality teaching & learning to enrich the lives of students, and to also ensure that society benefits from a workforce which is appropriately skilled and trained to meet the challenges of modern life.

In delivering effective further education, colleges must respond to the needs of the local community, regional needs, national needs (Scotland and UK level) and, for some colleges, an increasing international role. Delivering Further Education within local and regional contexts whilst also embedding national (and to a lesser extent international) policy initiatives can be a challenging balance to strike. The Scottish Government drives national policy initiatives to be delivered locally and regionally by each college and these do not always align with local needs or demands. The Scottish Government annual "instructions" to the FE sector are set out in a 'guidance letter' and are detailed. Most colleges in Scotland are also regional colleges that are expected to identify, plan and implement their own bespoke provision for their localities and regions – and this, together with national policy drivers, places increasing demands on college staff. To operate effectively, sufficient resources must be allocated to the sector and appropriate governance structures in place to ensure responsive planning and accountability for the use of public funds.

The EIS-FELA is concerned that since the implementation of the college merger programme in Scotland in 2012/13, there appears to have been a greater focus on centralising programmes. This is a departure from the

principles of further education in responding to the needs of the local community and such an approach should be resisted. It is fundamental to the delivery of further education, that the local provision of programmes continues.

Anecdotal evidence suggests that international initiatives have presented a number of challenges and opportunities in colleges in Scotland. Consideration needs to be given to how, or indeed if, resources are best deployed to support the delivery of programmes to international students. International students can bring additional revenues but such provision should not be substituting places for Scottish based students – especially when colleges have such an important role to widen access to education. Great care must be taken to ensure that FE colleges do not slowly evolve into HE colleges – with the associated HE business models and marketisation.

(b) In what sense are colleges public assets, and what should governments, communities, employers and people be able to expect from colleges?

The EIS-FELA believes that colleges are at the heart of the community they serve and deliver an essential public service to learners of all ages and ability. Whilst commercial opportunities may provide a source of funding, it must be acknowledged that this is limited and that the majority of college funding emanates in Scotland from the Scottish Government.

Given the level of public funding which is invested in the sector, EIS-FELA believes that colleges should, in line with other public sector organisations, be accountable for the financial decisions taken and the results generated in implementing the Outcome Agreements from the Scottish Funding Council.

It welcomes the fact that the majority of Scottish colleges must comply with the Scottish Public Finance Manual but is concerned that this obligation does not extend to all and that some Scottish colleges currently sit outwith the established governance arrangements, by virtue of the fact that they have been created as unincorporated bodies, principally companies limited by guarantee. Considering the significant amount of public investment in these entities, appropriate scrutiny should be in place and students and staff should have the security of knowing their education and jobs are protected.

Continued public investment in the sector is essential as a means of widening access to education and reducing poverty and inequality in society more generally. Such investment is key to delivering equity for FE learners in comparison to students in schools and universities.

Communities, employers, employees and students expect to have their voices heard in the planning of college curricula to ensure that provision is made to access a range of programmes at all levels, including provision for additional support needs.

In Scotland, colleges are not only public assets, but they are (mostly) public bodies. Colleges in Scotland have a good track record in providing access to prospective students from all socio-economic groups. There has however been a narrowing in the courses offered – especially access or non-award bearing courses that do not align with employers’ needs – which is a cause of concern. Furthermore, this narrowing of courses offered and greater alignment to courses that align with employers’ needs has also led to a reduction in part-time students, especially women. This is a cause for concern to the EIS as we believe that many access courses, non-award bearing (or non-accredited) and part-time courses give confidence to students to go onto to other courses. Furthermore, college education is more than simply preparing students for work.

(c) What would it mean for colleges to deliver a lifelong service for people of all ages? What changes would this require?

The EIS-FELA believes that colleges in Scotland currently play a key role in widening access to education and delivering lifelong learning. Colleges should ensure that they are placing the learner’s experience at the heart of everything the sector does. Further Education is about lifelong learning and education for social inclusion as well as for capacity building and employment in the communities served by the colleges.

The provision of courses and support is meaningless unless those who wish to undertake further learning can afford to do so. The funding model does not always support this objective.

Given the reduction in part time student places in recent years and the consequential impact of this on mature, female students, such a commitment to lifelong learning needs to be renewed and the alignment between local service delivery and national policy initiatives strengthened.

In recent years, the focus on full time, 15-24 learners has made the learner’s journey more difficult for non-traditional and adult returners, who may lack the guidance and confidence they need in the first instance to pursue further education. This was exacerbated by changes to funding arrangements which had led colleges to prioritise full time learners. Whilst these changes have been reversed, an emphasis should now be placed on encouraging part time learners to engage in further education. This will involve addressing aspects of the current funding system which actively discourage shorter courses, such as January – June programmes or part time, non-accredited programmes. These courses can often be a first step

into education for those furthest from the labour market and facing multiple barriers to participation.

Lifelong learning and reaching all learners will mean harnessing technology. However, this cannot be done without investment and should not be seen as a means of cutting contact time with teaching staff. UHI provides a model of how this may be done, but we believe that there are further improvements which could be made in this delivery. It should also be recognised that in our poorest communities the digital 'have-nots' – particularly but by no means exclusively older adults – lack the equipment, skills and infrastructure to access online provision and the network of community-based provision in these areas would require expansion.

It should also be recognised that in committing to lifelong learning, those furthest away from the labour market will also require investment in learner support services to sustain their studies and remove barriers to learning. They are often the learners who are in most need of part time, community based/outreach provision, which has diminished significantly in some regions. If lifelong learning is to be realised, then investment and the framework for the delivery of this provision should be made.

Perhaps one of the most vulnerable groups of learners supported by the provision of Further Education are those serving custodial sentences in our prisons. The delivery of high-quality prison education by trained lecturers is key to the rehabilitation process and provides an exemplar of education being tailored to meet the needs of learners and the community as a whole. A commitment to the delivery of meaningful lifelong service for people of all ages should ensure that it extends to and includes this group of learners.

2. Theme Two – Teaching, Training, Learning and Assessment: Lifelong, flexible learning for the future world of work

(a) Which core skills do we need to embed in all college curricula?

A key focus of all college curricula should be meeting learners' needs to ensure breadth and depth of learning in a context which is relevant to learners. Unless provision is made for an assessment of needs and consideration given to potential barriers to education, appropriate support cannot be put in place to ensure quality teaching and learning.

The core skills needed to facilitate learning will, therefore, vary from learner to learner. Whilst it is prudent to ensure that all college curricula include content on literacy, numeracy and digital skills, the provision must be agile and flexible enough to ensure that it can be adapted to meet the additional needs of students, beyond these core elements.

Additional Support Needs (ASN) provision is essential, both in terms of specialist support for learning programmes and also in meaningful ASN support for learners in mainstream education. Core skills provision needs to provide a range of entry and exit points for learners. EIS-FELA understands that there is currently little provision at SCQF level 4 in most Scottish colleges. For example, learners who wish to progress in STEM

subjects; to any teacher training programmes; to certain Arts & Humanities programmes, all require at least the National 5 Maths qualification. Most colleges deliver Numeracy and Maths at this level but only a small number deliver Numeracy and Maths at National 4 level. Consequently, learners, who have not achieved this at school (particularly mature students), are effectively 'blocked' from these courses. The significant correlation between poverty and attainment at National 4 level in Numeracy cannot also be overlooked.

Equally there need to be a range of exit points which meet the needs of learners. English for Speakers of Other Languages ('ESOL') is a good example of this point and needs to be sufficiently advanced to support learners in progression to Higher Education.

(b) How do we develop a coherent system of credit accumulation and transfer? What changes are required for education providers and other agencies?

The EIS-FELA would recommend that there is a consistent, nationally applied system of credit accumulation and transfer to allow a smooth transition between school, college and university with minimal repetition of levels. This would require *all* universities working with colleges and bodies, such as SQA in Scotland, to map curricula and develop clear articulation pathways. Such an exercise would require the commitment and backing of government. Left to patchwork and ad-hoc arrangements, the students who miss out are those already disadvantaged in the Scottish education system and this does nothing to address the attainment gap or wider issues of inequality.

There are areas in which this approach has been adopted. The Scottish Wider Access Programme ('SWAP') for mature student is an excellent example of this, with many success stories of learners from areas of deprivation with multiple barriers to education, achieving in college and then going on to achieve at university. However, this approach needs to be developed for school leavers as well.

We need a more coherent partnership around senior phase that involves actual practitioners in schools and colleges and not simply support and promoted staff. We also need to involve learners in those discussions.

A key focus should be on articulating the benefits and merits of further education, when faced with competition from training agencies. These discussions should concentrate on the quality of college provision, which is underpinned by highly qualified and professional teaching staff.

(c) How do we best strike the right balance between highly specialist and generalist provision? What role is there for regional collaboration between and across institutions here?

In considering the nature of the provision in further education, it is important to be clear about what is meant by the use of terminology such as 'generalist' and 'specialist' provision. It can mean different things to different people and can change over time, depending on the context.

Ultimately, the curriculum needs to reflect local needs and demand – not just employability in that you train as X and work as X. It should also reflect the transferable skills linked to that provision and the fact that learners may train in their local area with an aspiration to move elsewhere. Curriculum planning in the past has involved inadequate consultation with staff and students and a lack of comprehensive educational rationale (e.g. the significant cut to Creative Arts in Glasgow region in recent years).

In recent years, colleges in Scotland have developed approaches for regional collaboration between and across institutions in Scotland. The model adopted by UHI, for example, ensures that the educational needs of the learners in one community can be met through the delivery of courses across partnership colleges. This helps in ensuring that more specialist provision can be delivered across a wider geographical area whilst generalist provision can be delivered locally.

However, regional collaboration also often assumes geographical mobility on the part of learners (the same applies to provision across multi campus colleges). This does not reflect the reality of many learners' lives and can, in itself, act as a barrier to learning. Cost, balancing studies with part time work, childcare and disability are some of the factors which impact negatively on participation. The UHI model works because it does not assume this mobility. The EIS-FELA would recommend that further consideration is given to this method of delivery.

Who will we teach and train?

- (a) How should colleges develop outreach activities in partnership with other parts of the education system and other community organisations? What further role can colleges play, together with other organisations and agencies, in supporting a diverse range of people, for example, those in-work poverty, to access education and training opportunities?**
- (b) What would a funded, holistic lifelong careers and learning advice and guidance system look like and what would the role of a college be in delivering this within the community?**
- (c) How do we deepen the role which colleges play throughout a person's life – including in-work training, providing skills hubs for micro-businesses and SMEs and as a hub for other community services?**

The college sector is the lynch pin in the provision of the education and training in Scotland, establishing pathways from school to higher education and from school to apprenticeships and the world of work. Colleges have effective liaison processes with key stakeholders to ensure that courses are tailored to meet the needs of learners and local employers.

Innovative approaches to the delivery of education are being developed, making use of technology and digitalisation, where appropriate, in meeting the diverse needs of learners.

Some progress has been made in this respect recently. The Scottish Funding Council's Annual Report and Accounts 2018-19 highlights the successes in the further education sector in Scotland, quoting statistics which demonstrate an increase in the number of students progressing to positive destinations, as well as providing evidence of greater learning opportunities for learners across Scotland. Both the college and university sectors exceeded student activity targets and provide a commitment to ongoing work to address the attainment gap.

Central to the performance analysis contained in this report is the hard work and commitment of staff in Scotland's colleges in seeking to implement key governmental policies and deliver successful outcomes for learners.

However, as is outlined above, further work should be undertaken to develop greater access to lifelong learning for non-traditional and adult learners and in removing barriers to learning, particularly for those in in-work poverty. The links to the local community which have already been established at college level should be beneficial in engaging these remote learners and consideration given at college and regional level as to how these can be further developed.

The statistics in the SFC Annual Report and Accounts 2018-19 cannot overlook the fact that in the last 10-15 years, the college sector has seen the closure of many community outreach bases and a significant reduction in offer in others. Reaching those in in-work poverty and other 'hard to reach' students means being available to those learners in a way that is accessible to them, both geographically but also in terms of the funding models which are adopted and provide for shorter courses - not commercial or self-financed programmes. This must go beyond 'blended learning'. Many of these learners struggle to access education and need the support of face to face provision. They also need access to technology and the internet. Again, the UHI model may be useful - community-based hubs that learners can use to access VC provision with the option to attend face to face provision, where this is practicable. It should be emphasised that this is not 'online teaching'. It is using technology to extend and facilitate the learning taking place in the existing classrooms.

However, if the educational ambitions which are fundamental to the Scottish Government's strategic priorities and those referred to in the consultation paper are to be met and developed, increased investment in the college sectors is essential. The Audit Scotland 'Scotland's Colleges 2019' Report clearly outlines the challenges facing the college sector in terms of the ongoing delivery of these policy initiatives and in relation to the financial sustainability of many of the individual colleges. This report demonstrates the imperative for immediate action and investment.

How will we teach and train?

- (a) How can we deliver greater flexibility to support those in work? Does this mean more flexible provision – with a move to a seven-day-a-week service?**
- (b) What role can and should technological developments play in teaching, learning and assessment?**

(c) Must we expect greater flexibility from employers in supporting employees to study flexibly throughout the week, and what might we recommend here?

Whilst there may be a demand for greater flexibility in the provision of education, detailed consideration would have to be given to the practical implementation of these proposals, particularly in relation to the potential impact on the terms and conditions of employment of college staff.

It can be argued that the apparent need for greater flexibility is due to lack of flexibility on the part of employers releasing staff during the hours when colleges are already open. To fully support students during extended opening hours, it would appear that the full range of services such as learner support, finance and management will be available during these hours also.

National terms and conditions of employment have recently been agreed in the college sector in Scotland. For lecturing staff, the National Working Practices Agreement ('NWPA') refers to a 35 hour working week as well as making detailed provision in relation to timetabling:

'Teaching should be timetabled during the day whenever possible; where there is an operational requirement for an evening class then evening work will be allocated equitably, taking cognisance of individual circumstances, contractual arrangements and local collective agreements. No lecturer will be compelled to work for the morning, afternoon and evening in the same day nor work more than two evenings per week.'

Arrangements around extended provision would, therefore, have to be set within the confines of these existing terms and conditions of employment.

This must also be considered in the context of the significant decrease in demand for evening classes since the 1990s. The EIS-FELA is not convinced that there is evidence of an unmet need in this regard or indeed for the provision of classes outwith the traditional working week. Further research into this assertion would require to be conducted. Many of those in in-work poverty are employed in service-based industries on precarious contracts which offer no certainty in working hours. This makes committing to engagement on courses at set times more difficult. There are models, for example in trade union education, which could be explored for delivery on a more flexible basis for shift workers but these usually require shorter courses and potentially greater staff costs.

There are other good practice models which could be explored in this context, for example, partnership working between colleges and the Open University, where face to face sessions in college (delivered by subject-specialist college lecturers) underpin and support learners, who might not otherwise engage with or sustain studies with the Open University.

The other major issue is that those experiencing in-work poverty often struggle to access funding for part time study (which is mainly geared towards benefit recipients). This is an area which should be considered further in Scotland by Scottish Funding Council and the Scottish Government to ensure much clearer

entitlement. For example, part time students can access SAAS funding at HNC/D level but may find they are eligible to pay fees at non-advanced level.

Whilst reference is made to greater flexibility in the provision of education through the benefits of digitalisation, the EIS-FELA is concerned that this does not reflect that students learn in many different ways, provided a focus is placed on meeting learners' needs and those needs are assessed by a college lecturer. Digitalisation may provide one medium through which learning may be transformed but it is not the only one.

There is a growing number of online courses being offered by colleges and this is likely to expand in the future. Lecturers are already being deployed on such courses and great care must be taken in how such courses are developed and delivered. Online platforms should not be used to dilute teaching quality or lecturing time, i.e. for cost saving purposes. Their development should also be negotiated with trade unions to ensure that lecturing staff are fairly and properly incorporated into such platforms

Theme Three – Workforce and Leadership: Investing in Innovative and Collaborative People

- (a) How do we ensure that we have the right level of expertise across the college workforce? Should teaching staff across the four nations of the UK require qualified status and what is the requirement for – and investment in – ongoing CPD?**
- (b) How do we develop, recruit and retain the future leaders (staff and learners) required as the nature of leadership changes?**
- (c) What are the best examples of industrial relations inside and outside of the college sector from across the UK and internationally that we can draw from?**

Central to the attraction and retention of staff in the college sector is the commitment to ensuring that staff are fulfilled, appropriately remunerated, can work in an environment which values professionalism, provides a career pathway and embeds a commitment to career long professional learning.

In Scotland, the return to national bargaining has seen the creation of a new national pay scale for lecturing staff, the introduction of a national set of terms and conditions and an agreement which provides for the registration of college lecturers with the General Teaching Council for Scotland ('GTCS').

The EIS-FELA believes that teaching staff in the college sector should be qualified and registered with an appropriate professional body. College lecturers deserve the professional recognition which registration brings and the acknowledgement that teaching in a college requires a body of knowledge and the development of skills and experience to deliver vocational and academic qualifications to a wide range of learners.

College lecturer registration with GTCS has been a long-held aim of the EIS-FELA. In the early stages of national bargaining, one of the key priorities was

to tackle the casualisation and the deskilling of the college workforce and to ensure properly resourced provision for TQFE and lecturer CPD. GTCS registration was considered to be a key part of this.

Cross-sector working groups have been set up to establish requirements and pathways to registration. Registration will bring change to the sector. It sets down a challenge to the sector to look seriously at how it approaches learning and teaching and how professional standards are used. It challenges lecturers to be empowered and to take decisions about their own professional learning and development, with an emphasis on ensuring that this will be of benefit not only to the lecturers but the learners also. Registration brings challenges for colleges and for the Scottish Government, starting with the need for real investment in TQFE and lecturer CPD.

Registration recognises the key contribution that the college sector makes to the Scottish education system – the lynchpin between school and university and central to closing the attainment gap, whether offering real opportunities and alternatives to young people in the senior phase or providing Further and Higher Education that is genuinely accessible to all communities, no matter how remote. It also recognises the lecturers at the centre of this system as empowered professionals.

Promoted teaching staff, up to and including principals, are leaders of learning. They should also be qualified and subject to the same registration standards as their staff, as is currently the case in the schools' sector.

In considering this theme more widely, it must be acknowledged that further education takes different forms across the four nations and we currently have different forms of qualification. As education is devolved, EIS-FELA is unclear what 'qualified status' would mean in this context.

Theme Four – Funding, Governance and Accountability: A Sustainable System which Engenders Trust

- (a) What is the right balance between autonomy and accountability? How should colleges account for their impact?**
- (b) How can we use data more effectively? What needs to change in availability of data?**
- (c) Should colleges be funded for services or courses? Is it based on inputs or outputs?**

Given the level of public funding invested in the college sector, the EIS-FELA believes that accountability should be paramount.

In response to the ONS reclassification decision, the Scottish Government decided not to pursue any changes to legislation to remove colleges in Scotland from the public sector and endorsed the accounting practices applicable at that time, with the view being taken that the level of governmental control over colleges was appropriate. Scottish Ministers were clear that the controls, enhanced by the Post-16 Education (Scotland) Act 2013, were the right

solution for Scotland and were appropriate given the significant public investment in colleges.

This decision to ensure that Scottish colleges remained as public bodies ensured the continued level of public accountability and Parliamentary scrutiny in relation to the governance and financial arrangements of the college sector at that time. Audit Scotland has continued to have a key role in providing reports to the Scottish Parliament about the financial stability of incorporated colleges and Ministers can ultimately intervene to remove a Board of Management where this is deemed appropriate in terms of statute.

The EIS-FELA believes that this approach and the requirement placed on the incorporated colleges to comply with the Scottish Public Finance Manual are appropriate. As is highlighted in response to question 1(b) above, it is concerning that those colleges which have been established as companies limited by guarantee are exempt from these requirements. If the appropriate balance is to be found, then all Scotland's colleges should be subject to the same governance arrangements as are in place for incorporated colleges.

Colleges in Scotland are currently funded on the basis of Outcome Agreements. These Agreements have their foundation in the requirements set out in the Ministerial Letter of Guidance to the Scottish Funding Council. In recent years, the Ministerial Letter of Guidance has been a lengthy document, outlining an extensive range of governmental policy initiatives which must be delivered as part of the funding Agreement.

Whilst the EIS-FELA understands the importance of linking outcomes with funding, the wide range of policy initiatives which are included, could mean that there is breadth of delivery of policy objectives but to the detriment of depth of application. A careful balance must be struck in concluding these agreements to ensure that the objectives set will deliver a positive impact on teaching and learning and the quality of the educational provision. Any future change to the funding mechanism must also be fully equality impact assessed and the likely impact on programmes considered to avoid a recurrence of the situation which is referred to above with the consequences on the provision of part time places.

The small amount of non-public funding revenues that some colleges have should not be used to undermine the essential fact that colleges in Scotland rely on public funding and should therefore be publicly accountable as public bodies to the Scottish Parliament.

Theme Five – Relationships: Colleges at the Centre of Coherent Skills Ecosystems

- (a) How well do existing structures serve to support effective regional collaboration across all parts of the education system in each of the four nations?**
- (b) What changes to systems, funding mechanisms, performance measures or incentive structures would engender more effective collaboration?**

(c) Where should these be local or regional solutions, and where must they be led at a national level?

As we have outlined in response to Theme Two, the college sector in Scotland is central to the provision of the education and training in Scotland, establishing pathways from school to higher education and from school to apprenticeships and the world of work. Colleges have effective liaison processes with key stakeholders to ensure that courses are tailored to meet the needs of learners and local employers.

Through Scottish Government policy initiatives focusing on the Learners' Journey, widening access, skills development and apprenticeship programmes, work is ongoing in Scotland to continue to develop strong articulation between colleges and universities, innovative school partnerships and a wide range of employer partnerships.

However, if these initiatives are to continue and be effective, then it is vital that appropriate funding and resources are invested in the sector. We have highlighted this in response to Theme Two. Without such immediate action and investment, it is difficult to envisage how these key policy objectives can be met.

Employers

- (a) What mechanisms and structures exist to support and coordinate college-employer engagement at local, regional and national levels? Where they exist, how can their role be developed? Are any new institutions required?**
- (b) What is the particular role for colleges in supporting micro-businesses and SMEs? How can this be funded and coordinated at a local and national level?**
- (c) How can we better align strategic coordination across the full innovation cycle – with colleges particularly recognised as experts in close to market innovation?**

Whilst EIS-FELA acknowledges the comments made in this section in relation to the potential for greater engagement by colleges in driving local, regional and national economies, it is clear that the intrinsic value of education in its own right and the needs of the learner should always remain the prime consideration and focus of education in our colleges.

In particular, care needs to be taken not to weight the needs and views of employers above others (including teaching staff and learners). The comments referred to above in relation to potential competition with private training providers are also relevant here.

Recent years have seen colleges in Scotland focus on cost management. While this is doubtless important, the risks and costs associated with innovation have been downplayed, possibly with detriment to the level of product refresh and

introduction to new technologies, in particular in areas such as Digital Manufacture.

Governments

- (a) What should governments be able to expect of colleges? How does this compare to what they can expect of other parts of the education system?**
- (b) How do we better embed colleges in cross-departmental strategies and how do we ensure this aligns with regional and local strategies? How do we avoid 'projectisation' and build synergies across divergent policy aims?**
- (c) What freedoms must colleges have to determine local needs, with other local and regional partners, and what accountabilities must they have?**

The EIS believes it is right for government to fund colleges, as public bodies delivering an important public service to all citizens, and to ensure that they are part of a coherent and national education plan for Scotland. Colleges need to be clear what the funder of FE education in Scotland wants – and they need to be part of the process that decides national priorities, how to deliver those priorities and the resources needed to deliver Further Education. An annual ministerial letter of guidance is a public way of setting out Government's expectations for the following financial year – but this must be underpinned by regular engagement or such guidance becomes arbitrary.

Further education policy should be aligned with the both the secondary (school) sector and the rest of the tertiary sector (i.e. HE sector). The Curriculum for Excellence (CfE) already applies to much of the FE sector's work, and there is a common examination system (implemented by the SQA) and yet the FE sector does not seem to be well embedded in the processes that deal with these.

The EIS-FELA believes that government should engage closely with colleges in ensuring that the rationale and intention of policy initiatives is being delivered and is not having unintended consequences in practice. The focus on 15-24 learners and also on developing the STEM agenda, for example, appear to have been misinterpreted at college level and resulted in negative outcomes (e.g. cuts to part time places/mature students, cuts to creative arts because STEM is the priority).

Ultimately the colleges need to be directly accountable to Parliament (via the government), given the level of public funding invested in the sector; in particular, they have an essential role to play in delivering national policies.

There should be similar expectations on colleges, as there are in other parts of the education system regarding the quality of learning and teaching and this needs to be underpinned by similar investment in TQFE, professional learning, teacher empowerment and GTCS registration as well as broader investment in learning and teaching facilities, resources and class contact time.

Careful consideration needs to be given to planning and 'local needs' in multi campus colleges and multi region colleges – "local" in this context can mean a diverse mix of rural and urban areas some distance apart, or large cities serving a multitude of learners and communities with very different needs. Local needs should be jointly established by colleges with local authorities and other recognised local bodies, such as health boards and employers' organisations. Colleges should be transparent in ensuring that their expenditure is directed at meeting the agreed requirements.

As public bodies, all Scottish colleges have boards of public appointees to govern colleges and there has been much training made over recent years to ensure that they understand their responsibilities. College boards (and the regional strategic bodies – where applicable) have a clear role in ensuring - and being accountable for – the local and regional delivery of Further Education. This delivery applies both to local delivery of national policies and local delivery of locally identified needs. Ultimately, college boards (and regional strategic bodies) are responsible to Parliament.

One issue that needs to be noted is that parts of Scotland have FE colleges delivering all levels of Further Education and Higher Education, and great care must be taken that these do not become HEIs and lose their Further Education mission and ethos.

In particular, government needs to have an active oversight and accountability of governance and how colleges are run, both in terms of financial accountability but also issues such as restructuring and redundancy and consultation with trade unions, staff and learners.