



The Scottish Parliament
Pàrlamaid na h-Alba

EDUCATION AND CULTURE COMMITTEE

AGENDA

4th Meeting, 2013 (Session 4)

Tuesday 5 February 2013

The Committee will meet at 10.00 am in Committee Room 1.

1. **Post-16 Education (Scotland) Bill:** The Committee will take evidence on the Bill at Stage 1 from—

Mandy Exley, Principal, Edinburgh College;

Paul Sherrington, Principal, Banff and Buchan College;

Carol Turnbull, Principal, Dumfries and Galloway College;

Susan Walsh, Principal and Chief Executive, Cardonald College;

and then from—

Chris Greenshields, Chair, UNISON Scotland's Further Education Committee;

Penny Brodie, Executive Director, Lead Scotland;

Garry Clark, Head of Policy and Public Affairs, Scottish Chambers of Commerce.

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The papers for this meeting are as follows—

Agenda item 1

Written Evidence

EC/S4/13/4/1

PRIVATE PAPER

EC/S4/13/4/2 (P)

Education and Culture Committee

4th Meeting, 2013 (Session 4), Tuesday, 5 February 2013

Post-16 Education (Scotland) Bill

Clerk's note

The Committee will take evidence from two panels of witnesses on the Post-16 Education (Scotland) Bill. Some of those who will be giving oral evidence have provided written evidence in advance:

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Panel 2

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The Committee already has a full pack of written evidence submitted in response to its call for evidence. That evidence is available [here](#). The additional submission from Edinburgh College is the only one that has not previously been circulated to members.

**Jonas Rae
Committee Assistant
31 January 2013**

Edinburgh College: original submission**Introduction**

The Board of Edinburgh College welcomes the opportunity to respond to the Bill. Catering for 35,000 students, Edinburgh College is now the largest educational establishment in Edinburgh and the Lothians. It is likely to be among the largest single FE college in Scotland. As a newly merged college which will become a single Regional College once the Bill is enacted we feel our experience is directly relevant to the process. Our Chairman and Principal would be happy to provide further oral evidence to the Committee as required.

Overview

We are supportive of the aims of the Bill. Since the incorporation of the colleges in the 1990's there has been an increasing atomisation of provision across the sector without sufficient opportunity for strategic work and planning. We believe that the move to a regional approach to the planning and delivery of further education will go some way to correct this position. We believe also that it will help to ensure that provision meets the needs of communities, learners and employers.

Moves to widen access to university education are welcomed. Increasing opportunities for colleges and universities to combine their strengths and jointly deliver courses up to degree level should enable more cost effective access to higher education for both student and public funds.

We have concerns over the increased focus on young people in the 16-24 cohort, and believe this area is more problematic than allowed for in the Bill. Edinburgh College in common with others in the sector continues to provide educational opportunities for all adults within our communities together with building links with employers to support their staffing needs. We do not impose restrictions here, whether in age, experience or area of work. We feel it is important to retain a flexible approach for the good of both commerce and learners.

We are concerned that a move away from this provision would adversely affect the opportunities for economic development particularly in our poorest communities. In addition we think it is vitally important that employees and employers are provided with a range of opportunities for personal and workforce development. We are not convinced that the imposition of this one size fits all age limitation is either welcome or helpful here.

Changes in Funding and Planning

We note the increased involvement of Skills Development Scotland in the sector. We welcome the opportunity to have better data available to all involved in planning provision that this new involvement offers. We look forward to working more closely with SDS in this regard. However, at this stage, it is unclear how advanced the "data hub" development work is and what its relevance is unless it also collects employment information over a reasonable time period post the period of further and higher education. We are concerned that this process may lead in time to colleges

needing to develop extra student monitoring information and to interact in detail with a further regulatory body in addition to SFC and OSCR.

We would also have serious concerns over the potential policy and funding disconnect between SDS and those of the Scottish Funding Council. We are concerned that the increasing number of funding bodies and mechanisms may be inefficient and make it difficult for Regional colleges to plan effectively for a financially sustainable future. We would like more clarity on the process of future funding, the monitoring of outcomes and how unused money will be recycled between funders, colleges and other education providers.

In addition the change in the types of funding mechanisms appears to be occurring with little reference to colleges and moves to change the underlying funding mechanism for core grant provision also seem to be being “rushed” through with little thought to the potential effect on community and employer requirements.

Governance and Regional Colleges

We have concerns over the proposed structure of a Regional college board of management and in particular the intention to remove the legal requirement for a Principal to be a board member. As good practice, we believe that if the board is to fully exercise its function in “securing coherent provision of high quality fundable education” in an “economical, efficient, effective manner”¹ it should contain at least one member of the executive team. In both the private and third sector it is commonplace that the principal executive officer of a company or organisation is a board member and regarded as good practice. We see no rationale why this should not be the case in the college sector.

In addition, under the current legislation, the Principal \ Chief Executive of a college is the Accountable Officer for the college and as such responsible for its activities. The proposed legislation appears unclear as to which individual or body will be responsible for actions and outcomes at a Regional college.

We recognise that different parts of the country will have different forms of local provision. We also endorse the need for a common approach at regional level and the need for greater central planning and strategic control. However, there is in our view, currently a gap in the governance framework and the intention to provide more central control. What appears to be missing at this stage is reference to a framework for performance measurement, decision making, review and appeal when seeking to identify a “non-performing” college and the reasons for such non-performance.

In our view Outcome agreements with SFC should play a central role in this process, and while we recognise that work on outcome agreements is on-going, we believe it would be useful for the supporting information to the Bill to recognise this process or such successor processes as providing the framework for performance review.

¹ Bill P.3 lines 30-35

Dangers in the present approach

As we said at the outset, Edinburgh College welcomes the direction of the Bill and the move towards increased strategic planning and accountability, particularly within our local communities. We believe it offers a better future for learners, industry and key stakeholders, and those employed in the sector itself. However we are very worried that this potential positive development will be undermined and damaged because of the pace of change relative to changes in funding and provision.

As identified in the Policy Memorandum, college mergers have the potential to save substantial sums of public money. Similarly, changes in the funding criteria and policies could potentially help provide better focus and responsiveness. However, those processes are jeopardised if change is not coordinated and the pace of change achievable.

We commented earlier on the changes in funding mechanisms and the threat of a disjointed approach between the SFC and SDS. This needs to be addressed urgently. As importantly, merger and regionalisation activity is being undertaken against a backdrop of rapidly reducing funding to the further education sector (i.e. the potential savings identified are already being “banked”). Colleges will have to reduce costs rapidly to remain financially sustainable and there is a risk that opportunities for our students and our communities will be compromised.

We believe savings and efficiencies can be achieved but the current pace of financial cuts runs the risk of creating a funding crisis and short term staffing and educational difficulties which actually militate against the successful achievement of those positive changes. We must have a properly applied pace of change and reform, particularly to funding mechanisms, if we are to avoid the risk that will otherwise be placed on the operation of colleges and our shared aim to improve outcomes for our students and the community.

Edinburgh College: additional submission**Introduction**

This document builds on the evidence provided by the Board of Edinburgh College on 18th January 2013. It focuses on key areas of consideration raised in the original evidence. The document seeks to provide greater insight based upon the practical experience gained from the managing a college merger process and the challenge of managing the resulting college.

The College Principal, Mandy Exley, will provide oral evidence to the Committee in February 2013.

Overview

We are supportive of the aims of the Bill. A move to a regional approach to the planning and delivery of further education will help to ensure that provision meets the needs of communities, learners and employers.

We welcome moves to widen access to university education. Colleges and universities combining their strengths should enable more cost effective access to higher education for both student and public funds.

We have concerns over the increased focus on young people in the 16-24 cohort, and believe this area is more problematic than allowed for in the Bill. We continue to provide educational opportunities for all adults within our communities together with building links with employers to support their staffing needs. We feel it is important to retain a flexible approach for the good of both commerce and learners.

A move away from this provision would adversely affect the opportunities for economic development particularly in our poorest communities. In addition we think it is vitally important that employees and employers are provided with a range of opportunities for personal and workforce development..

We have three areas of specific concern which are covered in more depth:

- Changes in Funding and Planning;
- Performance Measurement and Review;
- Unintended consequences of the current approach – the proposed pace of change.

Changes in Funding and Planning

The increased involvement of Skills Development Scotland (SDS) in the sector appears to be driven by the desire to collect more information about the student body without clarity as to how this information will improve opportunities for employment¹. Colleges already collect and remit substantial course and student data to the Scottish Funding Council (SFC)².

We are concerned that this process may lead in time to colleges needing to develop extra student monitoring information and to interact in detail with a further regulatory body in addition to SFC and OSCR.

We have serious concerns over the potential policy and funding disconnect between SDS and those of the SFC. We are concerned that the increasing number of funding bodies and mechanisms may be inefficient and make it difficult for Regional colleges to plan effectively for a financially sustainable future.

Colleges have relatively fixed costs with a fully timetabled teaching workforce “committed” to course provision once the courses are opened to application nine months in advance of a term starting. It is unhelpful and inefficient for output targets and funding mechanisms to be changed mid-stream.

To cope with late changes, colleges have to cut or merge courses at late notice to the disadvantage of potential students; or alternatively design and offer new courses which may meet government targets but may not provide value in terms of student \ employment needs. These courses may require different delivery skills from those available from currently employed resources, increasing costs of delivery.

We agree with the process of outcome based monitoring and funding but colleges cannot currently change timetables overnight. Student, employer and employee expectations are set by two major start dates for courses; September and January. Moves to change or stop courses need time for consultation with students and those college employees affected by the changes.

We would welcome a dialogue which seeks to identify the educational and employment trends within our Region and nationally to enable a partnership approach to planning, funding and delivery of Further and Higher Education.

This process need not shy away from the challenges of reduced public funding, but should provide a better chance of colleges meeting the needs of students and the wider community than the current approach which appears to “rush” through changes to funding structures and amounts with little obvious thought or understanding of the operational challenges of delivery.

² Bill S15

Performance Measurement and Review

We endorse the need for a common approach at regional level and the need for greater central planning and strategic control. However, there appears to be a gap in the governance framework and the intention to provide more central control². What appears to be missing at this stage is reference to a framework for performance measurement, decision making, review and appeal when seeking to identify a “non-performing” college and the reasons for such non-performance³.

In our view Outcome Agreements with SFC could play a central role in this process, and while we recognise that work on outcome agreements is on-going, we believe it would be useful for the supporting information to the Bill to recognise this process or such successor processes as providing the framework for performance review.

Unintended consequences of the present approach – the pace and complexity of change

We welcome the direction of the Bill and the move towards increased strategic planning and accountability, particularly within our local communities. However we are very worried that this potentially positive development will be undermined because of the pace of change relative to changes in funding and provision.

As identified in Clause 7 of the Policy Memorandum, college mergers have the potential to save substantial sums of public money. Similarly, changes in the funding criteria and policies could potentially help provide better focus and responsiveness. However, those processes are jeopardised if change is not coordinated and the pace of change achievable.

We commented earlier on the changes in funding mechanisms and the threat of a disjointed approach between the SFC and SDS. This needs to be addressed urgently. As importantly, merger and regionalisation activity is being undertaken against a backdrop of rapidly reducing funding to the FE sector (i.e. the potential savings identified are already being “banked”).

The merging regional colleges need to reduce costs rapidly to remain financially sustainable whilst at the same time bringing together differing cultures, curriculum, management and administrative approaches. The scale of this challenge should not be underestimated and there is a risk that opportunities for our students and our communities will be compromised.

The majority of costs within the colleges relate to staff. The push to rapidly reduce staff is being supported by central funding but the speed of reduction will lead to knowledge being lost and will stretch management capabilities. These changes are taking place in the context of “preferred no compulsory redundancy policies” when employment opportunities are limited and employees face considerable employment uncertainties. Taken together, these factors may lead to many staff simply “staying put” hence achieving the required reduction of staff costs is complex.

Within Edinburgh College management staff will reduce by 50% in the ten month period post-merger. This is clearly referenced within the merger business case and

³ Bill S12

in real terms is a reduction in both costs and number of posts. The reduced teams will manage the same level of curriculum delivery as before, broadly the same number of staff and deliver the restructuring activity required across academic and support areas to ensure institutional sustainability.

It is inevitable that some areas of academic and student support activity will cease. In most cases this will be as a result of a rational process which identifies the weakest area of provision against the new direction of the sector. However, there may need to be an element of compulsion if the job reductions required for sustainability are to be achieved.

Colleges need clarity on the proposed timetable, costs and funding support for the delivery of long term changes to the sector. Harmonisation of terms and conditions will require funding. If funding is not available centrally, colleges will need to further reduce costs; primarily staff costs in order to fund these changes. The importance of a “national contract” for the terms and conditions of employment of staff directly related to learning and teaching, if not national pay would be an important support for merging colleges, both in terms of financial and workforce planning.

The cost of merging back office services should not be overlooked. This has been specifically excluded from any central merger funding but combining payroll, HR, finance and student record systems is a material activity. Management, staff and cash resources are required.

Meeting the changing needs of students will require continuing investment in both technology and buildings. Colleges will also need the flexibility to change the process and style of curriculum delivery; this must be considered in any harmonisation process

Colleges face difficult choices. If costs are not reduced, there will be less cash available for investment in teaching technology; potentially short changing our students.

Edinburgh College currently holds cash balances of circa £11m. This represents only two months expenditure on staff and other operating costs. There is little room for error and delaying the process of job reduction whilst core grant funding continues to be cut will lead to problems.

We believe savings and efficiencies can be achieved, but the current pace of financial cuts runs the risk of creating a funding crisis and short term staffing and educational difficulties which actually militate against the successful achievement of those positive changes.

Lead Scotland

Lead Scotland is a charity that enables disabled adults and carers to access inclusive learning opportunities. At a local level, we do this by providing direct support to learners through flexible person-centred learning opportunities and individualised guidance and support to help them plan their learning journeys. At a national level, we provide information and advice on the full range of post-school learning and training opportunities, as well as influencing and informing policy development.

The Post-16 Education (Scotland) Bill covers six areas: university governance, widening access, tuition fees cap, college regionalisation, review of fundable FE and HE and data sharing. Our expertise stems from Lead Scotland's experience in widening access to educational opportunities and so this evidence will predominantly focus on that aspect of the Bill.

Young people with additional support needs are a particularly vulnerable group. Such young people are more likely to experience social disadvantage and often experience significant barriers in accessing post-school education, training and employment, and are more likely to become disengaged with learning as a result of low self-confidence and lack of appropriate support. Support for disabled students is also likely only to worsen as the UK's welfare reform agenda unfolds.

Widening access to education

While we welcome the goal of widening access to higher education, the focus and particularly the target indicator, the portion of students from SIMD20% postcodes, is somewhat simplistic and narrow. The historical lack of access to HEIs is due to a range of complex factors. This single, narrow indicator opens up the possibility for HEIs to potentially ignore entire populations, such as disabled students and carers, who could access these educational opportunities with appropriate support. This exclusionary focus is reflected in the recently published university outcome agreements. Our analysis shows that the terms disabled student, disability or Partnership Matters rarely, if ever, are mentioned in the 2012-13 outcome agreements. In a typical example, an institution regarded issues under equality as only to do with general student intake, writing: "The University does not have a challenge in terms of its recruitment of disabled students and so targets for improvement are not required."

Such a view ignores the complexity of student populations and the key role that issues surrounding disability play in access and retention. This link between disability and access appears strong in the FE sector: compared to universities, colleges have both double the proportion of students from the most deprived backgrounds and double the rate of disabled students.

Access to education is particularly important for the life outcomes experienced by disabled people, including in areas like employability and gender equality. Disabled people are less likely to have a degree and more likely to have no qualifications at all, have much lower employment rates and are more likely to be economically inactive. For instance, people with mental health or learning difficulties, which are strongly associated with social disadvantage, have much lower employment rates

compared to both the average population and those with other forms of disability. There are also important considerations of social class, disability and gender; disabled students with access to HEIs under current arrangements are significantly more likely to be male and middleclass.

Data sharing

The third sector in Scotland has a large number of learners aged 16-24. If the data sharing plans in relation to Skills Development Scotland are extended to the third sector there will need to be adequate coordination and support to deliver on these duties.

Making the transition from school to university more effective

From our experience, many schools, local authorities and universities are unaware that the transition aspects of the Additional Support for Learning Act apply to learners making the transition to university. This legislation specifically requires schools/education authorities to start planning the support needed for young people with additional support needs around one year before they expect to leave school. In practice, many disabled students receive inadequate support through the transition to post-16 learning (what the EHRC label 'stalled transitions').

Appropriate transitional arrangements, such as agreeing and arranging reasonable adjustments and funding, are crucial in ensuring positive outcomes for students with additional support needs. The Post-16 Transitions policy and practice framework is a good start, but our experience with the Partnership Matters framework suggests that firmer arrangements should be put in place to ensure that schools and local authorities carry out their duties regarding transition from school for young people under both the Additional Support for Learning Act and Partnership Matters.

The role of Community learning and development (CLD) and national coordination

There are a range of learners who are likely to need targeted support in order to effectively re-engage in learning. This can be because of their support needs, individual goals, or requirements for residential support. These groups include:

- (i) Learners with profound and complex needs*
- (ii) Young people transitioning from special schools*
- (iii) Young carers*

At present, CLD providers in both the voluntary and local authority sectors receive funding and guidance from a mixture of local and national sources. As a result, provision, quality and support arrangements can be variable across the country, and learners are likely to experience a different learning opportunity depending on where they live.

In addition, as the focus of mainstream education moves towards younger learners and employability, the role of CLD will become vital for many older learners or for those who wish to access lower level courses, where less support is available. The current fractured nature of post-16 funding, particularly in CLD and the third sector, is

undermining the opportunities and successes for many of Scotland's most vulnerable learners. Some form of national coordination is required to ensure that Scotland is able to maintain its commitment to lifelong learning and that these opportunities are provided within an integrated national education system.

Source: EHRC Research report 59 - Disability, Skills and Employment: A review of recent statistics and literature on policy and initiatives:
http://www.equalityhumanrights.com/uploaded_files/research/disability_skills_and_employment.pdf

UNISON Scotland

Introduction

UNISON is Scotland's largest public sector trade union representing over 160,000 members delivering services across Scotland. UNISON members deliver a wide range of services in post 16 education including advice, research support, IT, finance, learning and student support services, cleaning, administration, libraries, technical and security, porter services, careers advice and management. These employees are often the face of education in Scotland and contribute a great deal on the overall student experience, providing the foundations for high quality learning for all. UNISON Scotland is able to collate and analyse members' experience to provide evidence to inform the policy process. We therefore welcome the opportunity to provide evidence to the Education and Culture Committee

Evidence

UNISON members in Higher and Further Education (HE and FE) feel that management and governance bodies do not engage adequately with staff both on the day to day running of institutions or on organizational improvement and development. Nor are they properly accountable for the public money they spend. UNISON has argued for some time that there needs to be greater oversight of management of these institutions. UNISON believes that colleges in particular would benefit from improved governance and public accountability. We therefore welcome the new ministerial powers in relation to boards.

More needs to be done to improve the quality of college boards and it may be these proposals could improve this particularly if board members are directly elected. UNISON is disappointed that the proposed regional boards will not include union representation unlike the proposals for HE. Our members have little or no contact with board members leaving them feeling the boards have little understanding of the day to day running of colleges and the implications of the decisions they make at board level. Moving to regional boards risks creating even more distance. Communication with staff is only via line management. This is not always of a high standard with our members in particular excluded. It is often one way i.e. management tell but don't listen. If board members had more contact with staff they would be better informed, more able to challenge management information at board level and therefore to improve the running of the college. Union representatives are best placed to undertake this role as they are directly accountable to their members through the democratic structures of the unions involved

UNISON members in HE are generally supportive of the proposals contained in the Von Prondiski report on governance in higher education and hope that these changes are not watered down when in the final bill.

UNISON fully supports the aim of widening access to higher education and is therefore concerned that the cuts in FE budgets and proposals to merge colleges will make it much harder for people from under-represented socio-economic groups to access higher education. Further Education is a key route to higher education for those from groups who are currently under-represented in HE. Proposals to concentrate courses into fewer venues in the name of efficiency will make it harder

for the government to achieve its aim. We have already seen a two percent drop in the numbers of part-time students, another important route for underrepresented groups. The fact that college courses can be undertaken close to home is really important. This cuts down on travel and childcare costs: key barriers to those on low incomes accessing and completing courses. Travelling long distances makes it difficult to work alongside study and also adds to any childcare costs as children have to be looked after longer. Transport links are often poor which makes it difficult and expensive to travel. Some people also lack the confidence to undertake study out with their own areas. There is also the added issue for young men who often face or fear violence when they travel out with their own communities. Local delivery of courses is crucial to people embarking and finishing their further education and training. Confidence and qualifications gained through undertaking FE provided the impetus for many to go on to Higher education.

College regionalisation is about budget cuts not improvement. Colleges have already cut over 1300 jobs; courses including vocational courses like aeronautical and aircraft engineering, computer animation, digital gaming green-keeping, and horticulture have been cut. Thousands of people were unable to find a college place this year. We believe that regionalisation could make a difficult situation worse. Instead of improving accountability and efficiency the current proposals merely merge colleges. Aside from the impact on students and the local economy our key concern is that many of the roles undertaken by our members will be moved into a “big shed” type delivering services across colleges and possible regions. Shared services are still the default option for improved public service “improvement” despite the lack of evidence that they improve public services or make substantial savings. In fact the experience of most public sector organisations in the UK and internationally is that moving to shared services creates a period of disruption and at best takes five years to make any cost savings.

The Roe Report called for longer hours to offer more flexible learning opportunities to help learners combine work and study but instead we see colleges closing earlier.

The proposals round regionalisation claim that there will be savings through the sharing of many so called back room services. This approach to service delivery still has many advocates despite the lack of evidence of them either bringing improvement or making any savings of the type needed to deal with the current spending cuts. In Further Education roles like librarians, finance staff, and welfare staff risk being pushed into a “big shed” delivery model. These require face-to-face contact with students.

Shared services are in fact extremely costly and have high upfront costs. The investment ratio is 2:1. Often costs are pushed to another department. The National Audit Office report indicates that so far projects have taken five years to break even. Key issues:

- Initial costs of shared services are underestimated because implicit costs and externalities are often not included.
- Introduction of shared services is complex and costly and requires detailed research.
- While some cost savings can be achieved, targets are rarely met.
- Savings are mainly from job losses.

- There are job losses in regional areas which affect the viability of rural communities

Evaluation of shared services projects has shown that savings targets are rarely achieved. One reason for this is that planned savings are often treated as real savings which encourage decision makers to back a project. UNISON is concerned that the same mistake is being repeated in the proposals. The Minister claims that the changes will make savings of £50million; this sum is based on estimates rather than actual savings achieved elsewhere. The only savings that have been realised in the quotes used are from the City of Glasgow merger the rest are estimates for example the Edinburgh college merger business plan assumes a saving of £9million. This has yet to be realised. It is also estimated that it will cost £14.6million.⁴ The City of Glasgow savings are almost exclusively through job cuts.

Audit Scotland's submission to the audit committee indicates that the costs of the regionalisation programme will be £54million. So even if the savings do materialise they will be outweighed by the costs until 2015.

Merging colleges in recent years has been difficult for the staff concerned. Consultation with staff has been minimal and the key staffing issues have been unresolved long after mergers have been pushed through. If changes on this scale are to be made then the staffing issues have to be resolved as beforehand so the new bodies can focus properly on delivery. The people who deliver services cannot be an afterthought it is they not structures that deliver improvement and increased efficiency.

UNISON believes that if this is to go ahead these issues need be resolved as part of the process rather than as an afterthought. Many require negotiation with the appropriate Trade Unions. Issues include

- Who will the employer be?
- How/will staff transfer to a new employer?
- Will there be a national set of terms and conditions for staff?
- How will these be negotiated in future?

Legal obligations such as TUPE need to be acknowledged in the legislation. The Water Industry (Scotland) Act 2002 provides an example which could be followed in this Bill, updated to the 2006 TUPE regulations.

23Transfer of staff

The Transfer of Undertakings (Protection of Employment) Regulations 1981 (S.I.1981/1794) apply to the transfer of functions by section 21, whether or not they would so apply apart from this section.

It is also important to include an amendment to clauses 23K(4) and 23L(5) to 'consult with a view to seeking agreement,' mirroring TUPE Reg13(6).

The Post Merger Evaluation of City of Glasgow College is frequently quoted to support the view that merging colleges is the best way forward. Our members do not feel that this evaluation reflects their experience. Contrary to the impression given

⁴ Correspondence from the SFC 14th November 2012 to the Scottish Parliament Audit committee

many issues remain outstanding and staff morale is very low. Ignoring UNISON's warning around these types of issues during changes in the Police Service has already led to difficulties. It is essential that the same mistake is not made here.

Careers Advisers need to be fully involved in post-16 support. They are the key professionals trained to ensure that people are able to make the right career choices throughout their working lives. The need for support in the areas of advice, information and guidance has never been greater and we should be enhancing and resourcing these services accordingly. They welcome the proposed improvements in data sharing. However, the last two years have seen a cut of up to twenty percent of frontline services within Skills Development Scotland. This has led to some office closures and greater difficulties for people accessing services at a time of high unemployment.

It has also led to a re- focusing that puts more onus on web based services as opposed to crucial face to face support. Although a website can provide information to those who can access it, it cannot provide the kind of support and guidance that most people require. Young people in particular need to be supported to have a realistic view of their competencies and aspirations to ensure they make the right choice. This requires face to face interactions with trained careers professionals.

Conclusion

UNISON represents a range of staff delivering post-16 education. We have used their experience to inform this evidence. The cuts in funding leave the sector facing enormous challenges. Fully involving both users and staff in developing programme for change rather than imposing from above is the best way to improve services. We therefore welcome the opportunity to participate in this consultation and look forward to further participation in the process of change.