

REPORT TO: Education Committee

MEETING DATE: 6 February 2018

BY: Depute Chief Executive (Resources and People Services)

SUBJECT: Empowering Schools: A Scottish Government Consultation on the provisions of the Education (Scotland) Bill

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1 PURPOSE

- 1.1 To present the outcome of the East Lothian consultation on the provisions of the Education (Scotland) Bill.
- 1.2 To seek approval to submit the East Lothian Council response to the Scottish Government by 7 February 2018.

2 RECOMMENDATIONS

2.1 The Committee is asked to:

- i. note the contents of this report;
- ii. approve the contents of the Council's response to the *Empowering Schools: A Scottish Government Consultation on the provisions of the Education (Scotland) Bill* (Appendix 1);
- iii. authorise the Head of Education to submit the Council's response to the Scottish Government by 7 February 2018. The Consultation closed on the 30 January 2018. East Lothian Council has been granted an extension to the closing date on the basis that it submits its response no later than 7 February 2018.

3 BACKGROUND

- 3.1 On 13 September 2016, the Scottish Government launched a consultation on Education Governance titled *Empowering teachers, parents and communities to achieve excellence and equity in education: A Governance Review*. In June 2017, the Scottish Government published the outcome of this national consultation in their report *Education Governance: Next Steps*. A number of the proposals within the *Education Governance: Next Steps*

report require legislative change. In November 2017, the Scottish Government published *Empowering Schools: A Consultation on the provisions of the Education (Scotland) Bill* to seek views on the proposals set out in the *Education Governance: Next Steps* report given the need for a change in legislation and the Governance of education at national and local level.

3.2 The Education (Scotland) Bill seeks views on five key aspects:

- Head Teachers' Charter
- Parental and Community Engagement
- Pupil Participation
- Regional Improvement Collaboratives
- Education Workforce Council for Scotland

3.3 On 19 December 2017, East Lothian Council agreed to provide a response to the detailed policy proposals set out within the Education (Scotland) Bill and to hold an extraordinary Education Committee meeting to approve its response.

3.4 East Lothian Council launched a local consultation on the Education (Scotland) Bill which closed on 25 January 2018. Respondents accessed the East Lothian Council Consultation Hub where further information was provided about the proposals, including an East Lothian Consultation Presentation. A public meeting, facilitated by Head Teachers, was held on 9 January 2018 to help respondents engage with the policy proposals set out in the Consultation document (Appendix 2). The Scottish Government Education Reform Team were invited to attend the public meeting but no response was received. The Education Service also facilitated two extraordinary Head Teacher meetings to discuss the Consultation in more detail and all school staff were involved in discussions with their colleagues on 19 January 2018.

3.5 East Lothian Council received 55 submissions to the Consultation. East Lothian Head Teachers submitted a response expressing the collective views of all Head Teachers (Appendix 3).

3.6 A summary of respondents is shown below:

Respondent	Number of responses
Parent Council/Forum	4
Parents/carers	14
Staff groups	7
Staff (individual)	29
Other- not identified	1

- 3.7 Education Service officers carried out an analysis of the submissions to inform the Council's response to the Consultation. It should be noted that separate responses were also submitted directly to the Scottish Government by individuals, staff groups, professional organisations and Parent Councils.

4 POLICY IMPLICATIONS

- 4.1 There are no immediate direct policy implications associated with this report. Pending the outcome of the Fair Funding Review and Education (Scotland) Bill consultations, any future policy implications will be subject to a future report to Full Council, as appropriate. The Education Bill proposes the removal of local improvement plans to be replaced by a regional improvement plan which will significantly change the democratic accountability of education services.

5 INTEGRATED IMPACT ASSESSMENT

- 5.1 The subject of this report does not affect the wellbeing of the community or have a significant impact on equality, the environment or economy. If the Education (Scotland) Bill proposals are taken forward through Parliament in their current form there could be significant risks to equalities for staff and for children and young people requiring additional support for learning.

6 RESOURCE IMPLICATIONS

- 6.1 Financial – The outcome of the Fair Funding Review consultation expected summer 2018 and the Education Bill consultation could have significant implications for the future funding of education at local authority and school level.
- 6.2 Personnel -The staffing resource required to deliver the pace of change set out within the *Education Governance: Improvement Collaboratives* paper will be challenging and could impact negatively on the ability of the education authority to deliver the planned actions set out in the Education Service Local Improvement Plan 2017-2018.

7 BACKGROUND PAPERS

- 7.1 Empowering teachers, parents and communities to Achieve Excellence and Equity in Education A Governance Review
<https://consult.scotland.gov.uk/empowering-schools/a-governance-review>
- 7.2 Education Governance- Next Steps Executive Summary June 2017
<http://www.gov.scot/Resource/0052/00521038.pdf>
- 7.3 Fair Funding to Achieve Excellence and Equity in Education
<http://www.gov.scot/Publications/2017/06/2057>

7.4 Empowering schools: A consultation on the provisions of the Education (Scotland) Bill <https://consult.gov.scot/learning-directorate/education-scotland-bill/>

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East Lothian Council's response to the Empowering Schools: A Consultation on the provisions within the Education (Scotland) Bill

East Lothian Council is clear in that within statute the local authority is accountable for the education and outcomes for children and young people and this must be recognised by the Scottish Government given the overwhelming confirmation of the need to retain this duty by respondents to this Consultation.

East Lothian Council is in agreement with the Scottish Government's drive to close the poverty related attainment gap. There is strong alignment between the Scottish Government's and East Lothian's vision to improve outcomes for all children and young people, particularly for those experiencing disadvantage, as set out in the Council Plan 2017-2022 and the Council's Education Improvement plan 2017-2018.

"Reducing inequalities within and across communities is the overarching objective that runs through the whole Plan and there are a number of strategic goals set out that will make the biggest impact in achieving this. We aim to reduce unemployment and improve the employability of our workforce and considerable achievements in this area have already been made through East Lothian Works, the council's employability service. Within the education service we are putting in place measures to reduce the attainment gap and raise both the attainment and achievement of our children and young people."

Council Leader, Willie Innes

Therefore, there are aspects of the Education (Scotland) Bill which resonate with the strategic goals and actions taken by East Lothian Council to improve outcomes for children and young people. However, there are significant differences as to how these desired improvements are to be achieved given the proposals set out in the Consultation document. East Lothian Council is of the view that improving outcomes for children and young people and closing the poverty related attainment gap is a societal challenge as well as an educational one. Schools alone cannot tackle poverty and disadvantage which requires a whole Council and partnership approach. East Lothian Council is proud of its inclusive approach with the presumption of mainstream education for children with additional support needs. Community services and engagement, and multi-agency partnerships are fundamental to improving the attainment and achievement of all children and young people. The Education (Scotland) Bill does not take sufficient account of GIRFEC, the national approach to improving outcomes and supporting the wellbeing of children and young people. Aspects of the Bill are not fully cognisant of the partnership working between education and other services at the heart of supporting children and their families. Furthermore, the Bill does not recognise the wider context within which our schools operate as demonstrated within the Council's approach to 'Total Place' community planning and empowerment. The Consultation's sole focus on education to the detriment of the broader service areas could result in specific risks for vulnerable children and those who require additional support for learning.

Governance

Currently, in our role as an Education Authority, East Lothian Council holds the statutory responsibility for the provision and delivery of education, for performance and improvement of individual schools as well as the cumulative authority, as the employer of all staff within a school setting and those who support its schools. This statutory duty is set out in the Standards in Scotland's Schools Act 2000 and was amended in 2016 to place new duties on Education Authorities and schools including new planning and reporting arrangements commencing August 2017.

The Education Governance: Next Steps paper disaggregates the strategic leadership role of local government and proposes redistribution of functions which has an impact on democratic accountability. The disaggregation of the provision and delivery of education from local government does not take account fully of other statutory duties set out in inter-related legislation, including the Children and Young People's Act 2014, GIRFEC and Education (ASfL) (Scotland) Act 2013.

The International Council of Education Advisers (ICEA) published a report in July 2017 on the International Council's initial analysis and discussion of the challenges involved, and the action required to make Scotland's education system world class. The ICEA was concerned that, in a drive to deliver clarity of purpose for all those involved in Scottish education, there was a risk that education policy was moving away from the "whole child" approach of Curriculum for Excellence towards a more specific, measurable approach as required by the National Improvement Framework. The ICEA also made some recommendations around the issue of governance stating it was important to consider how to de-clutter the system without damaging it. The ICEA advised against becoming too focused on changing the structure of the education system when, arguably, the more important aspects are the culture and capacity within the system.

East Lothian Council is clear that all matters of Governance must take account of education within the context of the community it serves and within which it is based and this is best served through provision governed at a local level.

"Currently we are on our own bus- driving our own bus. Fear is we have to be passengers on a double decker driven by someone else." Public Meeting

Head Teachers' Charter

East Lothian Council is committed to supporting an empowered workforce across all of its service areas. Within the Education Service, Head Teachers appreciate the autonomy to determine many aspects of the life and work of their schools, including financial decisions. However, our Head Teachers recognise the important role the local authority plays in relation to supporting their improvement agenda. Head Teachers recognise that the Council has in place the appropriate checks and balances to ensure national and local priorities are being taken forward at a suitable pace and a coherent strategic approach is taken to support the delivery of national initiatives such as Developing the Young Workforce. It is clear that, within our schools, our Head Teachers enjoy a level of autonomy and empowerment to be creative and innovative. However, it is also clear that they do not wish to lose the

current level of support and guidance provided by the education service or to be burdened with the additional duties and tasks set out in the Education (Scotland) Bill.

Regional Improvement Collaboratives

East Lothian Council is fully supportive of the establishment of Regional Improvement Collaboratives with approval to participate granted at full Council 31 October 2017. The Council's approval to participate in the South East Improvement Collaborative is based on the understanding that the Collaborative will enhance the support and resources provided to Head Teachers and schools across the county. However, the Consultation paper sets out a very different model for supporting schools that does not align with the position jointly agreed between COSLA, ADES, SOLACE and the Scottish Government, November 2017. The Consultation paper suggests all improvement and curriculum work will be directed by Regional Improvement Collaboratives with the local authority retaining responsibility for support activities such as HR and Finance. The Council is robust in its request that the Scottish Government recognise the role of the local authority and its partner services and agencies in school improvement and curriculum development. The proposed arrangements for school autonomy deliver more power to Head Teachers with the risks residing with the local authority.

East Lothian's participation in the South East Improvement Collaborative presents further opportunities to share effective practice and enhance the support provided to schools to continuously improve. Within the Consultation document there appears to be no educationally sound research evidence underpinning the proposed model of collaboration. Research studies on collaborative governance and effective school partnerships for school improvement highlight that schools collaborate for a multitude of reasons, over different timelines, with contrasting levels of intensity. Educational research cites time, resource and the pressure to commit to a particular collaborative as barriers to collaborative activities. Respondents to the East Lothian Council Consultation raise concerns on all of these aspects and that the commitment to work within a large Regional Improvement Collaborative is detracting from current networking and support activities.

Parental and Community Engagement

The Scottish Government already has a strong legal basis for parents to be involved in the life and work of their child's school through the Scottish Schools (Parental involvement) Act 2006.

East Lothian Council recently published its Parental Engagement and Involvement Strategy setting out its commitment to engaging and involving parents in the life and work of the school and its education service. The Strategy was developed in partnership with education officers, Head Teachers, staff, parents and carers. The Council, therefore, is supportive of greater engagement and participation of parents and communities. Those parents/carers who took the time to consider the proposals set out in the Consultation have raised significant concerns regarding new statutory duties, citing a lack of detail as to how these duties will work in practice, the risk that some parents will wish to run the school whilst others will not wish to engage with a more regulated body.

Pupil Participation

East Lothian Council is very supportive of the provisions in the Education Bill relating to pupil participation in every school. The Council carries out an annual student engagement survey at P6, S2 and S4 to capture the voice of children and young people. The outcome of the survey is used to influence and shape policy and practice within and outwith Council service areas. A Youth Summit to be held March 2018 will be the first bi-annual opportunity for over 150 of East Lothian's young leaders and influencers to come together to discuss, shape and inform education policy #EastLothianListens .

Education Workforce for Scotland

East Lothian Council is supportive of the principal of a broader professional base and recognition of staff working in education. This is particularly the case for those currently contributing to children's learning and well-being, including early learning and childcare staff. However, there are concerns relating to the affordability of being a member of a professional body which could impact on the potential to recruit and retain staff.

The response to the Consultation questions is informed by the analysis of 55 responses submitted to the East Lothian Council Consultation survey. It is important to note that many respondents commented on the inability to make an informed response due to insufficient detail on the proposals set out in the Education (Scotland) Bill. This is particularly the case where a change in legislation is proposed. A significant number of respondents reported concerns about the length of the consultation period given the proposed changes in legislation and future governance of education.

Head Teachers' Charter

QUESTION 1

The Head Teachers' Charter will empower head teachers 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 head teachers to fulfil this empowered role?

East Lothian Council is of the view that its Head Teachers are empowered and have the autonomy to act as the lead decision maker in how the curriculum is designed and provided in their schools. The Council is fully committed to ensuring all Head teachers have the requisite skills to lead learning and teaching and encourages schools to design and deliver a curriculum to meet the needs of learners in line with national guidance.

"In principle, we welcome increased autonomy for all head teachers, because that would bring head teachers in other local authorities into line with our own authority's approach."
East Lothian Head Teachers

Overall, respondents were in favour of the empowerment of Head Teachers within a framework which did not require legislation and carefully balanced the need for both empowerment and accountability.

Parent/carers expressed concerns that there will be too much focus on individual Head Teachers designing their own curriculum which could impact negatively on the consistency of experience for children and young people and potential progression pathways within the senior phase. Parents/carers also raised concerns about the delivery of a curriculum to meet the needs of all learners and the potential for those requiring additional support not receiving a curriculum tailored to their individual needs.

QUESTION 2

The Head Teachers' Charter will empower head teachers to develop their school improvement plans collaboratively with their school community. What improvements could be made to this approach?

Within East Lothian Head Teachers are already empowered to develop their school improvement plan collaboratively within their school and associated school communities. Guidance issued by the Education Service ensures that these plans take account of the National Improvement Framework (NIF) priorities and the NIF

drivers for improvement. East Lothian's Quality Improvement Team and quality assurance and evaluation arrangements supports the drive for continuous improvement and the prioritisation of support where the pace of improvement is more challenging. Respondents expressed their concerns that a Regional Improvement plan will not be able to take sufficient account of local circumstances. Parents/ carers commented positively on the involvement of the school community in the development of the school improvement plan and this practice is well-understood given the recent focus on using the HGIOS⁴ effective practice illustrations.

"Keep the links with the local authority (not just with the RIC)" Parent Council Member

QUESTION 3

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

East Lothian Council's view is that effective school improvement plans must reflect the National Improvement Framework, local authority and school priorities. Parents/carers commented on the wording of the question and the lack of detail within the narrative to comprehend the implications of the statement. Others stated that a school improvement plan cannot capture the range of services and organisations that support children's wellbeing and current improvement planning arrangements across education and children's services set out in statute are sufficient.

"In East Lothian the school improvement plan is paramount." Public meeting

"In what way is a Regional Improvement Plan better than an LA improvement plan? Why is a devolved government so keen to centralise areas which are currently devolved to LAs?" Parent Council

QUESTION 4

The Head Teachers' Charter will set out the freedoms which head teachers should have in relation to staffing decisions.

- a. What are the advantages and disadvantages of head teachers being able to have greater input into recruitment exercises and processes adopted by their local authority?**
- b. B. What are the advantages and disadvantages of head teachers' ability to choose their teams and decide on the promoted post structure within their schools?**

Advantages: East Lothian Council's Head Teachers already have considerable freedom to organise recruitment processes and determine the leadership team and promoted post structures required relative to the context of the school within which they work. Respondents commented on the positive approach adopted within East Lothian to include Parent Council members and pupils in the process. Most of those responding felt that head teachers should have input into recruitment exercises and processes but often countered their response with the caveat that this responsibility

should not lead to a narrowing of the curriculum, reduction in specialist teachers and competitive recruitment processes across our schools.

“... we feel that our head teacher already enjoys the ability to advertise for and choose their own staff, except in case of redeployments.” Parent Council

Disadvantages: East Lothian Council's Head Teachers expressed concern about the impact of allowing Head Teachers to refuse to deploy surplus staff. The local authority currently supports a collaborative and sensitive approach to re-deployment, particularly in situations where a breakdown in relationships is detrimental to the health and wellbeing of all concerned. The Council is very aware of the shortage of experienced, newly qualified teachers and those entering the profession. The unintended consequence of the distribution of the Scottish Attainment Fund (SAC) in recent years has led to the appointment of additional teachers in areas identified as SAC authorities or authorities with SAC schools. This has resulted in other authorities and schools fishing from a much smaller staff pool.

QUESTIONS 5 & 6

Should head teachers 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?

How could local authorities increase transparency and best involve head teachers and school communities in education spending decisions?

East Lothian Council is supportive of this given most budgets are already devolved with funding for ASN and early years retained to deliver the associated statutory duties. As a Council, budget processes are transparent and updates on the budget position provided regularly at Head Teacher meetings. The Education Improvement and Evaluation Group comprising Head Teachers and Education Officers is central to the annual Council budget setting process. Overall, respondents raised concerns about the additional burden placed on Head Teachers and the requirement to develop financial skills to manage their budgets and this becoming a distraction to focusing on learning and teaching.

“...we would benefit from greater transparency at a central level around fair funding for schools. This is a major concern for us, and we very much hope that one of the outcomes of this consultation is a clear, fair process of funding for schools.” East Lothian Head Teachers Response

QUESTION 7

What types of support and professional learning would be valuable to head teachers in preparing to take up the new powers and duties to be set out in the Head Teachers' Charter?

As previously stated, East Lothian Council is of the view that the model of support diagram within the Consultation document does not reflect the partnership working between the local authority, schools and communities to ensure a coherent approach to delivering improved outcomes for our children and families. The Council is clear

that the Head Teacher should not be burdened with additional powers and duties and that the current support provided by the authority, communities and partners must be recognised. There is real concern that the Head Teachers' Charter will impact on the recruitment of high-quality leaders and that no draft of the Charter was available to make comment on. Significant professional learning would be required in areas of employment, procurement, financial management and the new duties relating to parental engagement and pupil participation.

"We are concerned that the impact would be a disincentive for Head teacher to remain in their role, or to come to the role in the first place." Parent Council

QUESTIONS 8 - 10

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

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

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

East Lothian Council agree with the premise that parents have a critical role to play in their child's education. The Council has demonstrated its commitment to involving parents and the wider community in the life and work of its schools. This is underpinned by clear legislative duties set out in the Scottish Schools (Parental Involvement) Act. Strengthening the legislation should not remove the current legislative duties placed on the local authority. Many parents show an interest in their child's education but may not be in a position either due to work patterns or family responsibilities to have the capacity to engage with schools as suggested within the Consultation document. A significant number of respondents expressed their concerns that an expansion of the role of Parent Councils/Forums as described may result in parents withdrawing given this change in focus.

"Representing the diversity of the school community can be difficult and cannot be enforced upon parent council members or head teachers." Parent Council Member

Whilst there is agreement to extend the duties and powers in relation to parental involvement to publicly funded early learning and childcare settings there is uncertainty as to what is considered to be publicly funded and how the duty will be monitored within private settings receiving 600/1140 hours funding.

The Consultation document states within the wider activity paragraph page 19 '...the introduction of a home to school link work in every school to support parents who find it challenging to engage in their child's learning.' The Council welcomes the intention to support home to school link work in every school and is clear that this will require to be funded by the Scottish Government.

QUESTIONS 11 & 12

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 Head Teachers' Charter?

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...?

East Lothian Council agrees that all schools should pursue the principles of pupil participation as set out in chapter 3 of the Consultation document. However, the Council does not see, given current effective practice in schools, the need to include this within the Head Teachers' Charter or to create specific duties to create Pupil Council, committees etc. The Council is supportive of the creation of a general duty to support pupil participation supported through agreed principles of collaboration, dialogue, authenticity and inclusion. East Lothian Council can evidence a significant commitment to listening and responding to the views of children and young people to shape and inform policy and practice across its service areas.

Respondents to the East Lothian Consultation survey were in agreement with the principles of pupil participation but had differing views on how this should be achieved.

"This is a heavy handed way of doing it." Public Meeting

"Schools already encourage pupils to participate and be partners in their learning, there is no need to make this a legislative requirement. We see this as unnecessarily bureaucratic, disproportionate and without positive impact for pupils." Parent Council

"I am more in favour of being specific and consistent across the whole of Scotland so I would prefer to see specific duties in the Bill". Parent/Carer

QUESTIONS 13 - 16

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

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

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?

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?

East Lothian Council is supportive of the idea of collaboration and many of our schools benefit from collaborative activities with a specific purpose and collaborative networks to share practice and support improvement priorities. East Lothian's Head Teachers choose to collaborate with schools within and outwith the county and do so on a regular basis. The Education Service staff identify good practice in establishments within and outwith the authority to assist schools to collaborate with others on key priority areas. This ensures there is a clear rationale and purpose to the collaborative activity. Whilst the Consultation document states that Head Teachers can continue to collaborate outwith the Regional Improvement Collaborative it does raise the question as to why an imposed model is required.

East Lothian Council does not agree that improvement and curriculum support is the sole responsibility of the Regional Improvement Collaborative. Children's Services and other Council services play a critical role in curriculum support, school improvement and the wellbeing of children and young people in our schools. The Education Service contributes significantly to school improvement with an understanding of the varying contexts within which our schools operate. This service could not be delivered to the same quality at a Regional level. Furthermore, our elected members play an important role in the life and work of schools within their constituencies. East Lothian's Head Teachers are concerned that the leadership and direction provided by the local authority will be lost within a Regional Improvement Collaborative. East Lothian Council questions to what extent East Lothian schools will benefit from the additional support to be provided by national bodies such as Education Scotland given the current lack of capacity to do so and the allocation of such resources to Scottish Attainment Challenge authorities. East Lothian Council does not agree that the Regional Improvement Plan should replace the local authority plan.

Those in attendance at the public meeting were not in favour of the Regional Improvement Collaboratives raising concerns about centralisation of resources, an additional layer of bureaucracy and a lack of evidence that the approach will lead to improvement. Others expressed concern about the possibility of a loss of jobs within East Lothian if the proposals were implemented. Parent Council members commented negatively on smaller authorities having to either give up specialised, valued staff to support other authorities at a time when staffing was challenging. Parent Council members also commented on the inability of parents to contribute to the Regional Improvement Plans given the tight timescale set. This is viewed as being contradictory to the principles of parental involvement as set out in the Parental and Community Engagement section of the Consultation document. Others questioned how the RIC will be financed and are concerned that the RIC would be a financial drain on local authority budgets.

"The middle layer in the local authority does so much for you and your job security and without that there would be massively uncertainty" Teaching staff

"We genuinely do not see why the RICs will be more effective than LA control, and we cannot see that the document provides any justification for this approach." Parent Council

QUESTIONS 17 -24

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

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

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

What other functions might you suggest for the proposed Education Workforce Council for Scotland?

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

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

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

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

East Lothian Council is supportive of the purpose and aims of the Education Workforce for Scotland and has no further suggestions for other functions. The Council is concerned with the proposal to introduce mandatory registration for education professionals and considers this to be a matter for further consideration with relevant stakeholders. Currently, professional bodies require members to pay a registration fee and involves the local authority in various administration tasks to ensure employees are members of the appropriate registered body. The introduction of new regulations for employees in posts such as classroom assistants, playground supervisors and pupil support assistants could deter people from applying given the need to pay a registration fee and complete the necessary paperwork. However, it could equally be argued that being a member of a professional body could raise the profile and kudos of all staff who contribute to children's learning and wellbeing such as early learning and childcare staff.

Overall, respondents are supportive of the purpose and aims of the Education Workforce for Scotland in relation to non-teaching posts. Parent/carers required more information to be able to provide an informed response.

Empowering Schools Consultation Public Meeting
7pm, Tuesday 9th January, Musselburgh Grammar School

The meeting was attended by Officers of East Lothian Council, Head teachers, Elected Members, an MSP and Parents. Fiona Robertson, Head of Education gave a presentation and there was discussion at tables around the following topics.

Parental Engagement

General comments which are open to interpretation

There was concern from parents around the use of a “Legal Framework” to engage parents.

“Parents” in the Parent Council are volunteers and this could be very off putting and ‘scary’

How representative are Parent Councils of the wider parent body – how would making it ‘legal’ make a difference.

Time for parents to engage.

This may cause tensions between parents.

Parents are afraid that they may be viewed as a part of the system.

Expectation versus duty: a legal framework means more accountability.

Lots of disparity in this. We feel very well consulted by the HT.

Already have the channel, what are they asking HT’s to do that’s different.

We are generally well informed.

Clarifications of legal requirement – what would this look like?

One size fits all does not work – Regional Improvement Collaboratives (RIC)

East Lothian will be lost in the system.

We have a fantastic system already – will RIC take our good HT’s out of East Lothian?

RIC requires us to involve our best teachers.

Bigger voices will be heard and East Lothian will be lost.

Good teachers will be lost.

There is insufficient information for us to come to an informed view.

RIC – Head of Education will spend one day a week at RIC.

Will making it a legal obligation be a barrier to new parents? – Feeling is yes it will put parents off engaging.

Parents collaborating on improvements - is this doable for HT’s and Parent Councils?

Are Parents qualified to do this – risks parents positing particular agendas e.g. their own needs.

Parent Councils are designed to fit the individual school – what works for one Parent Council and school may not work for another.

Why is this change happening? – Parents being engaged in education leads to better outcomes

We don't feel able to comment as we don't have enough information.

How would this 'legal' requirement be enforced? What would happen if a Parent Council was ever taken to court – not great for parental engagement.

Insufficient information to comment.

Difficult for private nurseries to have the same obligations on parental improvement as not all children are publicly funded.

Questions

How is the Parent Council success measured?

Are the duties and responsibilities enforceable?

Are the Parent Council's in East Lothian already compliant?

What does compliance look like?

Regional Improvement Collaborative – who is accountable?

What are the legal implications?

What do HT's not do at the moment?

How well informed are we, to be making those decisions?

Changing definition of parental involvement, what is it?

How can we be consulted on something we don't know?

Duties – what are these specifically?

What is it being changed to?

How do we balance 'diversity' (duty) as Parent Council while still being confidential?

Q8 Are the broad areas for reform to the Scottish Schools (Parental Involvement) Act 2006 correct?

Responses to Question 8:

- Seem appropriate.
- What has been missed on this?
- Parental involvement definition (x3 frameworks)
- Difference from Local Authorities to HTs.
- So vague.
- Are we the likely experts to do this?
- Parents are concerned as to the burden this will place onto the HT.
- HT's already do this.
- How will our relationships change?
- How do we complain if not working to RIC?

- Could be in Fife (RIC) don't know our settings, school etc
- Who are the RIC? We don't know.
- Edinburgh and Fife are so huge, we will be lost.
- This is like asking turkeys to vote for Christmas.
- Until duties are made clear we cannot come to a view on this.
- What will the duties/legal framework be for parents – and HTs!
- What does the Scottish Government want to change and why?

Q9 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?

Responses to Question 9:

- Such a wide ranging question.
- What do we think is not happening now?
- What is the evidence that it is not happening?
- What is the evidence to justify that in the first place?
- Lots of opportunities, fantastic opportunities, feel well supported at the moment.
- Such a positive experience.
- Does it need to be a legal condition?
- Insufficient information to make an informed response.
- A number of those present agreed that HT's are currently involving parents and that information has been passed on to parents.
- Is the focus for HT's going to be focussed on being lead learners.
- Our experience in East Lothian is positive, nobody steps in to say you can't do this.
- Better communication between Local Authority and Parent Councils.
- Difficulty in engaging the wider parental forum.
- Feels like there is a perceived lack of trust between parents and HTs and this is not our experience. A legal framework is not required.

Q10 Should the duties and powers in relation to parental involvement apply to publicly funded early learning and childcare settings?

Responses to Question 10:

- More parental involvement is needed in Early Years and Childcare settings.

Head Teachers Charter

General comments which are open to interpretation

Already have the autonomy – Local authority have to participate in RIC

- Karen Haspolat (RIC) numeracy
- Fiona Robertson (time on RIC)

Collaborate with other schools will this be prescriptive?

Develop Regional Improvement Plan with RIC.

Will this mean redeployed staff – what happens to staff? – Instability for staff.

Funding – delegate budget to staffing.

Time required for HT – I would need a lot of training.

Staffing/Budgets – help and support is there – staff in HQ help the HT a great deal already.

East Lothian Council already has lots of HT autonomy.

Already difficulties in retaining/ recruiting HT's – workload looks to be increased with these changes and additional layers and less local support.

Currently we are on our own bus – driving our own bus. Fear is we have to be passengers on a double decker driven by somebody else.

Concern HT charter does not achieve consistency, it delivers small freedoms. Budget planning with staffing could mean that HT's face decisions on NQTs or more experienced staff.

Q1 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?

Responses to Question 1:

- Training not your area of expertise.
- Not sure it will empower HTs.
- HTs are already empowered as leaders of learning.
- Feel very empowered to be a HT, Leader of learning
- Do not agree with the basis of the question.
- They want a business manager.
- Different skills set
- We do not agree with this statement – we want educationalists not business managers in our schools.
- HTs should be allowed to use the English system.
- Financial – What has happened to move towards
 - o Multi academy trusts – finance, focus for HT takes away from class.
 - o Look south of the border to see the implications
- Most HTs didn't go into teaching to become business managers
- Not empowering, it's a burden.
- Real capacity issues.
- Need to review the workload of HT's if they are empowered to be leaders of learning – not managers!

Q2 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?

Responses to Question 2:

- Need assurances that the improvements will be made.
- In East Lothian we drive for improvement, HT determines the SIP
- There is not a need for empowerment, it's already there.
- HT's should be empowered but they already have that in the form of QIOs – school review visits.
- There is a line to follow.

- The RIC will lose East Lothian.
- QIO's – they know us, they know our data etc. If someone from Fife comes in, do we have fresh eyes coming in?
- Our QIOs know our schools etc.
- Why do I need this?
- I like being one of 41 not 300.
- We like what we have already.
- This is changing the HT job description without HT input – also don't know what it will look like.
- How does Fife know what my school needs?

Q3 The Charter will set out the primacy of the school improvement plan. What are the advantages and disadvantages of this approach?

Responses to Question 3:

- Is this different to our current reality?
 - o QIOs understand - quality of SIP – importance of it
 - o Needs to drive improvement
- In East Lothian the school improvement plan is paramount
- Liaise with the RIC – on SIP - concerns people don't know how it will work.
- It is Nonsense – SIP – RIC – national – dilution of impact
- How meaningful are the priorities set by the RIC?
- If HT's are being empowered then it has to be their improvement plan?
- HT's are empowered to do our bidding?
- Support for all curricular areas (x8 areas) – dictated to schools by national bodies

Q4 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?**
- b. **What are the advantages and disadvantages of headteachers' ability to choose their teams and decide on the promoted post structure within their schools?**

Responses to Question 4

- HT's in East Lothian already have lots of freedom to do this.
- HT given autonomy – risk and reward – some HT's could surround themselves with yes people.

Q5 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?

Responses to Question 5

- Question is misleading – allocated – East Lothian doing well and the RIC would prohibit.
- Already freedom in this.
- HT's should be able to say that this is not the best fit for our school.

Q6 How could local authorities increase transparency and best involve headteachers and school communities in education spending decisions?

Responses to Question 6:

- Funding budgets are already very transparent.

Regional Improvement Collaboratives

General comments which are open to interpretation

- Risks:
- No Local knowledge.
 - No local QIO – ELC.
 - There would be a Regional collaborative QIO.
 - A few local authorities underperforming in Scotland means everyone gets a row.

No mention of how this will improve attainment or outcomes for children.

Concerns over size of the RIC.

Feel it is another layer of unnecessary bureaucracy.

The timeline is unrealistic and there is no detail available.

Distance from the need – will RIC SIPs be meaningful or too generic?

Concern about losing our expertise in improvement leadership to RIC – away from our own pupils.

No funding and pressure on Local Authorities who have already implemented Learn/smart working to provide to RIC – double whammy to small authorities.

Where is the evidence base that ‘regional’ collaboratives have improved outcomes for children?

Delete questions 13-16 – we do not support RIC.

Totally disagree with RICs therefore do not wish to respond to the questions.

RIC are not consistent with empowering HT's – centralising education.

We get lots of support from centre at the moment.

Authority will become just pay and rations.

We don't approve of these changes.

Why would we need a head of education?

At a stage when we are getting lots of support from the centre, we wouldn't want this to diminish.

Q13 Should the Bill include provisions requiring each local authority to collaborate with partner councils and with Education Scotland in a Regional Improvement Collaborative?

Responses to Question 13:

- Are we for the RIC – no.
- No evidence it will lead to improvement.
- Suspicion – budget will be cut and all that will lead to is the RIC taking resources.
- Should engage with Education Scotland but not RIC.
- No to RIC – off course with Education Scotland.

Q14 Should the Bill require each Regional Improvement Collaborative to maintain and to publish annually its Regional Improvement Plan?

Responses to Question 14:

- It's a waste of time – it could be motherhood and apple pie.
- Lots of paper of what we are doing, very little action
- Disagree with RIC.

Q15 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?

Responses to Question 15:

- RIC reporting on all schools – how can they report on all the schools have achieved?
- Worded in a way that it is motherhood and apple pie

Q16 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?

Responses to Question 16:

- New cycle.
- Expanded over 300 schools, East Lothian will be diluted.
- What will happen to the reports to government?
- Scrap all this and start all over again.

Pupil participation

Questions 11 and 12 totally agree with the premise.

Q11 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?

Responses to Question 11:

- All education research suggests the more pupil participation the more enjoyment – if you impose the RIC then the pupil voice is going to be lost.
- Do we do it through rights respecting schools?
- What will that requirement look like?
- This a heavy handed way of doing it.
- Already agreed: how effective will this change be if it imposed on them rather than happening naturally?
- There is a real conflict – RIC plan will not have a pupil plan
- Model/approach taken by RIC may not be best fit for school.
- Pupil voice is about changing hearts and minds – changed organically
- Principle is sound – it has to make sense for individual schools.
- Agree that pupil participation is paramount – questions about how this will be implemented
- Will no longer flow naturally but will become a tick box exercise.
- If pupil voice is not done correctly it is harmful.

- Conflict between requirement of RIC and local school.

Q12 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...?

Responses to Question 12:

- It should be about the outcomes.
- It is wrong to say 'do it this way'
- Agree with the principal, these should not be done in a specific way.

Education Workforce Council

General comments which are open to interpretation

East Lothian way should guide how we act as professionals.

This is not a priority! – Let's park it.

Fees a concern for support staff.

Lack of trust re professionals numbers on EWCfWS.

Everyone would all adhere to the same standards.

Would add weight to the role.

Shouldn't pay the same fee as teachers.

Fee should be based on salary.

General feedback

General comments which are open to interpretation

Not enough detail and information on this overall to really know and give informed views and answer questions.

How can it work?

Where does it fail?

Removal of support mechanisms for HT's.

Dilution of Local Authority checks and balances.

Staff recruitment being more at risk.

What significant risk could come from the proposal? : Delocalised, becoming centralised control and funding controlled from a central point – government oversight reducing Local Authority control.

What gains could come from the proposal? : Improvements across a wider body of schools which were struggling – if funding was in the mix

Centralist Agenda

Empowering Schools: a consultation on the provisions of the Education (Scotland) Bill

East Lothian Head Teachers' response

Introduction

This response represents the views of East Lothian's secondary and primary head teachers. Although we have worked closely with our local authority in considering the consultation this feedback captures the independent views of school leaders.

As head teachers, we welcome the idea of empowerment, and we very much accept the need for change in the school system if we are to deliver improved outcomes for young people. We support the broad principles outlined in the consultation document and see real potential in partnership working with other local authorities to enhance and support improvement.

However, having had some experience of that process through recent attempts to promote joint working with Midlothian Council we are keenly aware of the complexity and challenges of effective collaborative working across authorities.

We are bewildered by the lack of time and national events that has been provided, that might allow proper consideration of these proposals. These are hugely significant proposals. Why has this consultation been so rushed and under-resourced?

There is a close relationship between freedom, innovation and money. Many of our schools will not have, based on current funding arrangements, the money to make meaningful use of any increased freedom.

A key obstacle to empowering schools is the nature of the current teachers' contract. Without significant changes in this area innovation will be stifled and young people will be disadvantaged. This must be addressed immediately if real change is to happen.

We like working in a local authority which has been open and transparent in all of its dealings around the issues outlined in the consultation. East Lothian Council's approach has allowed us to consider properly all sides of an ongoing debate.

Head Teachers' Charter

- 1. The Head Teachers' Charter will empower head teachers as the leaders of learning and teaching and as the lead decision makers in how the curriculum is designed and provided in their schools. What further improvements would you suggest to enable head teachers to fulfil this empowered role?**

Head teachers in East Lothian are already completely empowered as leaders of learning and teaching and as the lead decision makers in how the curriculum is designed and provided in their schools. Our Education team work in partnership with us and we are only required to adopt particular approaches to learning and teaching in the delivery of numeracy.

Our collaborative approach is underpinned by research evidence, and allows schools to determine how best to deliver the curriculum to meet the needs of their learners in line with the principles and values of Curriculum for Excellence. East Lothian Council does not impose any local restrictions on the organisation of subjects, staffing or flexibility by head teachers in leading learning and teaching.

In principle, we welcome increased autonomy for *all* head teachers, because that would bring head teachers in other local authorities into line with our own authority's approach. However, there is insufficient information available in the consultation materials to fully ascertain the impact of being aligned to a Regional Improvement Collaborative (RIC), rather than a local authority, and how that might affect future improvement.

There is little consensus around what a high quality curriculum looks like. It may well be that the freedoms given to head teachers currently working in more constraining authorities will, in fact, simply result in the freedom for head teachers to maintain the status quo.

We also hope to see the outcomes of this consultation provide further elaboration around curricular partnerships, considerate of which is surprisingly thin so far. Key partnerships with learning providers out with school settings are an essential part of any future improvement agenda.

We have significant concerns regarding the new legal duties on head teachers. As an extremely hardworking group of professionals, who are continually striving to raise achievement for all, we are concerned about the personal liability these proposed changes will result in. There are major challenges in recruiting head teachers across Scotland and it is difficult to see how these changes will encourage people to take up this post. This will have a significant impact on education for young people.

2. The Head Teachers' Charter will empower head teachers to develop their school improvement plans collaboratively with their school community. What improvements can be made to this approach?

Our local authority's current approach to improvement planning is a very positive collaboration between local authority priorities and school priorities. We are concerned that the introduction of RIC improvement planning will dilute effective local prioritisation in improvement planning. Our work already links to the National Improvement Framework, and we are not at all clear what a 'shared model of accountability' actually means.

3. The Head Teachers' Charter will set out the primacy of school improvement plans. What are the advantages and disadvantages of this approach?

We take no issue with this approach. It is essential that school improvement plans are central in delivering positive outcomes for young people

4. The Head Teachers' Charter will set out the freedoms which head teachers should have in relation to staffing decisions.

- a. What are the advantages and disadvantages of head teachers being able to have greater input into recruitment exercises and processes adopted by their local authority?**
- b. What are the advantages and disadvantages of head teachers' ability to choose their teams and decide on the promoted post structure within their schools?**

East Lothian secondary head teachers already have the freedom to organise recruitment processes and decide on their teams and promoted post structures.

The real issue, which this consultation does not address, is the wholly inadequate number and quality of newly qualified teachers. Without this issue being properly addressed increased freedom around staffing decisions for head teachers in other local authorities is meaningless.

We now also need greater clarity around the role of student and probationary teachers if these proposals are to be properly appraised.

We are concerned about the impact of allowing head teachers to refuse deployment of surplus staff to their school. At a time of financial austerity, with reduced funding from government, many schools need to be able to exchange surplus staff if they are to have any hope of balancing school budgets.

However, current arrangements for tackling poor performing teachers do need to be completely reworked. Much more streamlined, quick and effective processes currently operate within employment law in England and such approaches must be adopted in Scotland.

Although local authorities will allocate resources to support the provision of additional support needs, it is not at all clear in the consultation how this will actually work. In this central part of school life detail is everything. If we are to get it right for every child we really need a great deal more clarity here.

In East Lothian we receive high-quality HR support from a local authority which fully endorses the freedoms we already have around staffing. We are concerned about the likelihood of diminished support if our local authority's role is reduced. It is not clear how local authorities will engage with schools around areas such as finance, procurement, health and safety and technical assistance. It is essential that national expectations for local authorities are established in areas which individual schools cannot effectively address individually.

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

East Lothian head teachers already have control of their spending decisions. We are therefore, of course, supportive of this idea.

6. How can local authorities increase transparency and best involve head teachers and school communities in education spending decisions?

We already work in a local authority where there is a great deal of transparency around education spending decisions.

Our Head of Education shares spending decisions with us in head teachers' forums and is open and transparent in her dealings with individual schools and clusters. We therefore have no specific need for greater transparency at a local level.

However, we would benefit from greater transparency at a central level around fair funding for schools. This is a major area of concern for us, and we very much hope that one of the outcomes of this consultation is a clear, fair process of funding for schools.

7. What types of support and professional learning would be valuable to head teachers in preparing to take up the new powers and duties to be set out in the Head Teachers Charter?

Significant professional learning would be required in areas of autonomy, such as employment, parental engagement and student engagement. Once clarity is achieved around the nature of the new duties for head teachers then learning needs will become clearer.

Much greater levels of professional learning will also be required around innovation, taking cognisance of good practice around the world. Scotland has been incredibly innovation shy in its school-led

curricular decisions and most head teachers will need a great deal more stimulus if they are to fully embrace the possibilities for innovation.

Current SNCT agreements around the teacher contract must be addressed immediately, with new national expectations established. Significant professional learning for *teachers* will continue to be required to ensure that the needs of young people are the priority.

Parental and in Community Engagement

- 8. Are the broad areas for reform to the Scottish Schools (Parental Involvement) Act 2006 correct?**
- 9. How should the Scottish Schools (Parental Involvement) Act 2006 be enhanced to ensure meaningful consultation by head teachers with parents on substantive matters of school policy, improvement planning and curriculum design?**
- 10. Should the duties and powers in relation to parental involvement apply to publicly funded early learning and childcare settings?**

Without more detail around the responsibilities suggested within the consultation document it is not possible to provide a clear response to these questions.

What *is* clear is how difficult it is to ensure that parents from all backgrounds are involved in the life of a school. It is not at all clear how these increased expectations will actually make this happen. No specific mechanisms are detailed that might engage our hard-to-reach parents.

We need to ensure that the expectations outlined in the consultation are not too onerous for head teachers, given the significant workload head teachers already face. If the expectations are unreasonable this could have a further detrimental effect on head teacher recruitment.

Pupil participation

- 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 Head Teachers' Charter?**
- 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.?**

Our learning communities focus on learning, life and the work of the school and we are committed to ensuring pupil participation.

We do believe that the Bill should include a requirement to ensure pupil participation, although a lack of detail around that general duty means, inevitably, we are not clear whether this should be included in the Head Teachers' Charter.

Overall, however, we would support more general duties rather than specific duties which may not be achievable in all school settings.

Regional Improvement Collaboratives

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

We are supportive of the idea of collaboration, and many of our schools benefit already from high-quality collaboration with schools across the country. We do not believe that there is a requirement for Regional Improvement Collaboratives to take over the strategic planning of education.

This view is based on the high-quality strategic direction we currently experience in our local authority, and is also informed by the fact that there will be a significantly increased 'distance' between schools and Regional Improvement Collaboratives. It seems likely that this greater distance will lead to unfocused and generalised expectations that will have little impact on the lives of young people.

Educational evidence suggests that there are lots of different rationales for collaboration, with different timescales applying to different forms. Many of our schools already have very focused collaborative partnerships, and it is likely that RICs will simply add another layer of bureaucracy at a time when we are striving to tackle that problem.

The best collaborations are always designed by the participants, rather than being imposed and the imposition of RICs flies in the face of that approach.

There is real concern amongst head teachers around the staffing of RICs. Many schools will not wish to provide high quality staff for a RIC because those staff are already heavily committed to existing school responsibilities and collaborations which are having real impact. Furthermore, giving up good quality staff to a RIC could work against head teachers being held more accountable for the outcomes of their school.

We are hugely concerned that inadequate funding for RICs means that they will either be ineffective or will require funding to come from schools (through staffing or time). When coupled with no additional funding for IT solutions, we are inevitably sceptical about the likely impact of RICs on school improvement.

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

Based on the above response we do not believe that RICs should be required to produce an annual Regional Improvement Plan. Moreover, the current timescale for the first set of RIC plans is hopelessly unreasonable, and will result in poorly focused plans.

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?

Naturally, we would support this

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?

Yes. Certainly.

Education Workforce Council for Scotland

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

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

The principle of a broader base for staff working in education is good. However, introducing professional standards for all involved, with a professional body, may well have a negative impact on recruitment of, for example, classroom assistants. Many high quality non-teaching staff would not react positively to such regulation.

We support the principle of raising the profile of all who contribute to children's learning and well-being. However, we are concerned that the new requirements to register with a professional body needs to be reflected in such staff's remuneration and conditions. Therefore, a key purpose for this body should be to ensure appropriate payment for all education staff.