

WRITTEN SUBMISSION FROM THE EDUCATIONAL INSTITUTE OF SCOTLAND TO THE PUBLIC AUDIT COMMITTEE, DATED 27 MAY 2015

Introduction

The Educational Institute of Scotland (EIS) welcomes this opportunity to provide a written submission to the Committee on the report 'Scotland's colleges 2015' (the Report). The EIS is Scotland's largest education union representing around 55,000 members employed in Nursery, Primary, Special, Secondary, Further and Higher Education (around 80% of the teaching profession). The EIS is the sole recognised union for college lecturers in Scotland.

Summary

The EIS does not accept many of the findings in the Audit Scotland report on Scotland's colleges published 1 April 2015 as it believes the Report does not accurately reflect the effects of recent mergers and funding cuts. The EIS believes that some of the Report's findings are flawed, since they are neither supported by the narrow range evidence cited or by other evidence available to the sector. The Report accentuates positive elements, and sometimes relies on sources of evidence which may not be robust.

In particular, the Report's conclusion that *'the changes to date have had minimal negative impact on students'* is simply wrong in the view of the EIS. There have been deep and damaging cuts to course provision, student intake and lecturing staff numbers during the period covered by the Report. Access to appropriate FE learning opportunities in colleges is now far more limited for many prospective students – with the impact on part-time learners, women, mature students and learners with additional support needs (ASN) being particularly severe.

The Scotland's Colleges Report

The Key Facts section of the Report sets out a series of statistics that show the effects on colleges of significant funding cuts. Whilst the section identifies some alarming consequences of the funding cuts, the EIS believes the real picture is even worse.

For example, (i) the number of college staff hit its maximum in 2011-12 of 15,100 and a minimum of 13,400 in 2012-13¹. This is a fall of 11% (ii) Scottish Government programme college funding for 2010-11 was £580m² and £526m² for 2014-15, which gives a real terms cut of around 21%³ which is far greater than 12.3% cited by the Report for 2011-12 to 2013-14

Furthermore, whilst the Report's figures for the fall in part time and older student numbers is startling, *"There has been a reduction of 48 per cent in part-time students and a reduction of 41 per cent in the number of students aged 25 or older between 2008-09 and 2013-14."* the

¹ <http://www.gov.scot/Topics/Statistics/Browse/Labour-Market/PublicSectorEmployment/PSEwebtables>

² Figures from Letters of Guidance to the SFC from the Scottish Government

³ Real terms as measured by RPI

report does not follow up the consequences of these cuts on the fewer opportunities offered to these groups or the general breadth of FE provision.

Impact on Students

Key Conclusion 4 of the Report states, *“The changes to date have had minimal negative impact on students.”* The EIS believes that this finding is wrong, and set out its reasoning below citing the Report’s itself to support its belief.

Paragraph 50 of the Report states:

“So far, Education Scotland has completed three reviews of the more recent merged colleges (Edinburgh, Glasgow Clyde and Dundee and Angus colleges). It reported that colleges had effective learning and teaching in place which met the needs of learners. It also highlighted good practice in a number of areas, as well as strong links with employers to inform the design of curricula and to improve student employability. But it also noted that there was evidence that staff were resistant to the changes brought about by the merger process, and that merged colleges needed to focus more clearly on achieving their strategic aims. The Edinburgh College report also highlighted that the college had difficulties in some curriculum areas as new processes and management structures were implemented.”

In other words, only 3 merged Colleges have had Education Scotland Reviews with one college identified as having clear difficulties as a result of the merger. The other two reviews are cited as including wider merger issues amongst staff. The Report’s analysis skims over the “Areas for development” that exist within the Education Scotland Reports for these three colleges and which raise concerns - including completion rates and self evaluation processes.

Para 50 ends with: *“The SFC and Education Scotland are working together to develop and trial new methods for assessing and monitoring the quality of teaching. It is important that these new methods also allow colleges and the SFC to identify any significant issues resulting from the reform of the college sector.”*

In other words, the SFC and Education Scotland have yet to measure the quality of teaching and therefore to state that there has been “minimal negative impact on students” is flawed and unsustainable.

(Para 51) *“The National Union of Students (NUS) has noted a concern that merged colleges might centralise learning within regions. This would mean some students having to travel further, potentially resulting in fewer students participating in learning”*

This practice is already taking place within some college regions according to evidence from EIS members. Therefore, where multiple colleges would previously have offered all NC and HNC/D courses within a region, the newly merged college maintains the NC courses at all the campuses but rationalises the HNC/D to fewer campuses.

(Para 52) *“The SFC met students as part of its six-month post-merger evaluations to discuss issues such as changes to learning and teaching, enrolment and access to the college. Feedback indicated that there had been little adverse effect on students. Some students highlighted benefits including improved resources, greater choice of courses and better*

progression and employment opportunities. However, some students raised concerns about potential campus changes and delays in the recruitment and admissions process. It will be important that colleges respond to student concerns, and that colleges and the SFC continue to seek student views as part of ongoing monitoring and evaluation.”

The Report seems to concentrate excessively on positive student feedback, whilst the negative student feedback is minimised by the Report. The paragraph above could have concluded that student feedback was mixed with some adverse effects on students arising from the mergers.

Para 53 *“Of the four fieldwork colleges, only Dundee & Angus College provided us with survey results covering more than one year. The other fieldwork colleges had not analysed trends in survey results covering their merger periods.”*

If only one college provided student satisfaction for more than one year, how can Audit Scotland draw sector wide conclusions for the period between 2011/12 and 2013/14 on student satisfaction? It should also be noted that Audit Scotland is relying on a college for measuring its own student satisfaction. Such data may not be robust should be treated with caution.

Para 53 continues *“The Dundee and Angus College results indicated that overall satisfaction, as well as satisfaction ratings on specific topics, including enrolment, induction and the college experience, decreased marginally between 2013 and 2014, but still remained largely positive.”*

The only college with multi-year data shows **lower** satisfaction ratings – but this is glossed over as being “largely positive”.

Para 53 continues *“Colleges, the SFC and Education Scotland should continue to monitor student feedback to ascertain if college reforms have adversely affected students.”*

Student feedback is one measure, but is subjective and the EIS suggests other measures such as completion rates.

Para 54 *“In 2013-14, about 238,000 people (headcount), attended college, around 19,500 fewer than in 2011-12 (7.6 per cent). This is 36 per cent lower than in 2008-09 and reflects changes in Scottish Government policy. In August 2009, the SFC issued guidance to colleges to reduce the number of courses that did not lead to a recognised qualification or that lasted less than ten hours. As a result, since 2008-09, the number of part-time students has fallen by 48 per cent. Full-time equivalent (FTE) numbers remained relatively stable between 2008-09 and 2011-12 due to slight increases in full-time students. In the past two years, there have been decreases in both part-time and full-time students (decreases of 10.4 per cent and 1.5 per cent respectively). This has resulted in a fall of approximately 3,000 FTE (2.5 per cent) between 2008-09 and 2013-14”*

Fewer students going to Colleges, fewer people aged over 25, and fewer part time students – all these are negative indicators showing a narrowing of FE provision. These findings are supported by published EIS research in 2013 and 2014.

Para 58 onwards refer to wSUMS delivered by Colleges including Exhibit 6, however, there is no mention that the SFC reduced the number of hours teaching linked to each SUM in 2011-12 from 18 hours to 16 hours. This means that Colleges from 2011-12 gave the appearance of delivering the same FE activity whilst in reality their teaching could have dropped by over 10% for each SUM.

Para 63 states *“This analysis suggests that the changes to date have not significantly affected students. However, it is too early to provide a comprehensive assessment as some aspects of the merger process are still under way.”*

The Report seems to be acknowledging that its assessment is not comprehensive or complete.

Colleges Finances

The EIS is surprised that the Report has not commented on the move of £99m of public money to independent bodies outwith the public sector and not subject to public sector scrutiny.

The Report is clear that the savings generated by the FE sector are a consequence of reduction in FE staffing. The Report does not explore how a College sector can deliver the same amount of FE provision with 9% fewer staff whilst maintaining the same quality of teaching. Furthermore, the latest PSE figures from the Scottish Government show that the number of FE college staff is increasing again. Surely this development should have been mentioned by the Report as it may undermine the Government's aim to deliver annual savings of £50m per year.

Staff Concerns

Para 88 *“As part of its six-month post-merger evaluations, the SFC gathered feedback from staff on a range of issues. These included the general impact of the merger, the culture of the organisation and the progress made with finalising staffing structures. While there was some evidence of staff highlighting the positive results of the mergers, a number of areas of concern were raised, including increased workloads and the loss of staff with key skills and knowledge.”*

This evidence does not appear in the Report's Key Messages. As with all of the Report, it starts highlighting the positive and then seems to minimise any negative comments – or the potential that mergers have had any negative consequences.

Whilst there is reference to the NUS within the Report, Audit Scotland nor the SFC asked the EIS for evidence for this Report or any other review – despite the EIS being the voice of the profession.

Para 91 *“While reductions in staff could affect service delivery, there is no evidence of any overall deterioration. We did note that, for three colleges, changes in finance staff affected the preparation of financial statements. In only one of the cases (Coatbridge College) was the impact significant.”*

The EIS believes that there is evidence within the Report of concerns and lower student feedback scores. Para 63 also states that no effective evaluation is possible of teaching standards before and after the mergers.

Rationale for mergers

Para 3 *“The Scottish Government and the SFC expect the reform programme to deliver a number of high-level benefits, including reduced duplication, improved engagement with employers, better outcomes for students and financial savings of about £50 million each year from 2015-16. ... it is unclear what savings have been achieved in addition to reduced staffing costs and what the full costs of the merger process are as there are no systems in place either at individual colleges or centrally to collect this information. It is also unclear what progress there has been in achieving some of the wider benefits expected from the mergers.”*

The validity of £50m of annual financial savings is not explored in any detail. Furthermore, the Report's finding that there is no system in place centrally to measure the benefits of the college mergers would seem to be a shortcoming.

Severance Packages

Key Message 7 states that *“auditors found significant weaknesses in how two colleges processed senior staff severance payments, while another four fell short of good practice.”* In other words, six colleges are criticised in the way that severance packages for their senior staff were handled. Six colleges within a sector of twenty six colleges is a large number, especially as the senior staff or governors that authorised these payments are likely to be still in the sector. The Report does not seem to be overly concerned with the severance payments, and it is to the Committee's credit that it has followed up this aspect of the Report. The Report does not make any comments of the SFC's role in monitoring or authorising severance payments.