

The National Parent Forum of Scotland (NPFS) has given serious consideration to this response, as the implications of the review are likely to be far-reaching and potentially create disruption. Although we believe in the continuous improvement of the Scottish education system, it is important to ensure that changes are evidence-based and will benefit the learning experiences and wellbeing of children and young people.

Overall, parents acknowledge that there are inconsistencies across local authorities but they are clear that they do not see any value in adding another layer of bureaucracy. Parents also state that there needs to be greater clarity over the roles and responsibilities of all stakeholders. Greater cooperation and communication are key to ensuring that systems and procedures will effectively enhance, rather than impede, a child's learning.

In addition to inviting Mr. Swinney to our November forum meeting to discuss the review, we conducted four focus groups within Glasgow, Dumfries and Galloway and Highland. Participants represented a broad demographic, including urban and rural areas, primary and secondary schools, ethnic minorities, parents with English as an additional language (EAL) and a range of SIMDs (Scottish Index of Multiple Deprivation). We received submissions from all of our local authority volunteer representatives, which at present represent 28 of the 32 local authorities, and from a large number of umbrella local authority parent council groups. We have also considered comments submitted from Scottish parents via social media, email and our website.

Joanna Murphy, Chair, National Parent Forum of Scotland

Q1. What are the strengths of the current governance arrangements of Scottish education?

Local authorities are seen to have a clear responsibility for providing education services throughout their area and, as the councillors who oversee education are democratically elected, parents can influence those who are elected to represent them. Parents sit on many local authority Education Committees and, in the majority of local authorities, local councillors attend parent council meetings at some level. Parents feel that local authorities are accountable and understand the local issues within the wider social environment that each school sits, and are sensitive to the demands of their area.

Following the introduction of the Scottish Schools (Parental Involvement) Act 2006, school boards were replaced by the formation of parent councils. The National Parent Forum of Scotland has been commissioned to review the 2006 Act and preliminary findings strongly support the parent council structure. The majority of respondents to our call for evidence found that their parent council supported school management and helped parents to become more involved in the school.

The balance between local authority and school management is found to be successful in two main ways: devolved school management and Curriculum for Excellence (CfE). Devolved school management is long established across Scotland and is looked upon positively by the parents that provided feedback. Curriculum for Excellence (CfE) is seen as a further strength, with its founding principles in the development of the child and in the manner in which it allows flexibility for schools to build a curriculum suitable for their own pupils.

Q2. What are the barriers within the current governance arrangements to achieving the vision of excellence and equity for all?

Resource and funding restraints

Devolved school management is seen as a positive initiative, but national agreements on staffing arrangements and salary levels means that the bulk of this budget is taken up by staffing costs. This places limits on the flexibility and autonomy for other types of spending. Current procurement systems also place additional restraints on head teachers and the majority of parents feel that local authority contracts do not always provide best value for money. For example, one parent said that following a changed printing contract, a teacher in their school hid an older printer so they could continue using it. The teacher did this because there would be fewer printers under the new contract.

Teacher Shortages

Parents have given many examples of the measures schools are taking due to teacher shortages and are concerned about the over-use of supply teachers.

- Head teachers are often filling in for teachers, which impacts the performance in their own tasks and responsibilities
- Some schools are using supply teachers instead of going through the process of recruiting full-time, permanent teachers
- Teachers are retiring and immediately becoming supply staff, re-employed by their school, due to the better terms offered as a supply teacher
- Ad hoc supply staff are not receiving inset training.

Where there is no school budget for supply teachers, or no supply teacher available, there are examples of children being allowed to watch films in class. Parents are also concerned that teachers do not seem to have time to collaborate and work on best practice.

In addition, we find that levels of pastoral care in schools are not standardised across the country so some young people have better access than others. Some schools offer extra services including *Place2Be* centres while others do not have enough guidance teachers.

Additional support needs (ASN)

Parents feel that children with additional support needs are suffering disproportionately from budget cuts. In a 2015 NPFS online survey, 55% of respondents did not feel that their school's additional support for learning (ASL) resources met their child's needs and 38% said their child had been adversely affected by the changes to ASL provision in their school. Parents feel that the funding mechanism for children with ASN needs to go beyond SMID and we would welcome the ring-fencing of funds for ASL. The inclusion agenda must remain a priority, and parents feel that if funding is required to provide specialist services then it must be supplied.

Communication

Parents seek better communication between parents, schools and local authorities. Whilst there is often a duty to consult, this consultation is frequently conducted in an ineffective manner.

In our current review of the Scottish Schools (Parental Involvement) Act, we are finding disparity across the country in the ways that individual schools, parent councils and local authorities communicate with their parent forums. The views of parents should not be just a tick box exercise. We will be making recommendations on communication in our forthcoming report of the review.

Addressing Rurality

Parents from rural areas of Scotland state that education provision is adversely affected by their location. Fuel poverty is an issue, the financial burden of flights and ferries limit opportunities and in addition there is a need to improve these transport links. Parents often tell us that music and language provision is negatively affected. They recommend that, in addition to the numbers of free school meals, other factors be taken into consideration when determining levels of need in rural areas. Parents also emphasise that problems around broadband connectivity can set up huge inequalities.

Q3. Should [these] key principles underpin our approach to reform? Are there other principles which should be applied?

We agree with the key principles.

Q4. What changes to governance arrangements are required to support decisions about children's learning and school life being taken at school level?

If evidence supports the need for change, it is important that the benefits are optimised.

The 2015 OECD report *Improving Schools in Scotland* suggests that the 'middle' is formed of schools and local authorities, however, there have been many varying suggestions as to what this 'middle' may be and it is unclear in the consultation documents. NPFS asked Mr. Swinney to clarify "the middle" and he suggested that we regard the child as being the real middle. We believe that the key to facilitate this is communication, cooperation and an acknowledgement of shared responsibility across all levels.

Greater mutual cooperation between Scottish Government and all local authorities is required, regardless of politics, to achieve an effective system that ensures the best possible outcomes for children.

Whilst we appreciate the value of CfE as a curriculum that can be set by schools to suit their own locality, we hear from parents who are frustrated by the 'postcode lottery' of the arrangement, feeling it can never suit all children in the school and we would welcome some standardisation in some aspects, for example, the way senior phase exams are offered.

We also believe that changes to communication standards are required to address the disparity in how individual schools, parent councils and local authorities communicate with their parent forums across the country.

If schools are to make more decisions, it follows that formal mechanisms must be put in place (and legislated for), so these decisions are made in statutory consultation with the parent council and wider parent forum. To contribute effectively, it is important that parent forums are supported in their efforts to contact parents in their wider communities, in whatever method is appropriate to their locality. The actual mechanics of what format this consultation should take, and for what decisions it would apply would need to be worked through as any future guidance develops.

However, whilst we would urge for statutory consultation, we do not believe that the parent council should be given any further statutory decision making duties or powers. Our call for evidence (Review of the Scottish Schools (Parental involvement) Act) found that only 24% of parents answered 'Yes' when asked would they like parent councils to have more power.

Q5. What services and support should be delivered by schools? What responsibilities should be devolved to teachers and head teachers to enable this? You may wish to provide examples of decisions currently taken by teachers or head teachers and decisions which cannot currently be made at school level.

Parents have been very clear to us in their opinion that the main role of teaching staff is to be engaged directly in educating children, and that any changes should be focused on helping teachers carry out this role. To avoid extra pressure on teachers, parents suggest that business managers would be required for any additional administrative tasks. Even in a business manager model parents are concerned that teachers would still be removed from their duties, as this would be an additional member of staff to manage and decisions to oversee. Furthermore, we would see it as problematic if the business manager was not managed directly by the head teacher, thus causing disempowerment of the head.

The majority of parents who have engaged with us do not think that giving schools more accountability would improve performance and are concerned that the additional financial and legal responsibilities would exacerbate the head teacher shortage. Parents also have concerns about where legal responsibility would lie in an altered system. For example, if legal duties were removed from authorities then support services could disappear and we would seek to avoid them then being charged out to schools as income generators.

However, parents did believe that recruitment and procurement were better dealt with at a school level:

- Recruitment, in terms of selecting the right teachers for their team, was felt to be a
 core responsibility of head teachers and best left to individual schools, particularly
 the recruitment of additional support needs (ASN) provision where specific knowledge is most valuable. This already happens successfully through Devolved School
 Management in areas such as Aberdeen and Glasgow.
- In terms of procurement, specifically, tailoring products and services to the individual schools, parents feel that it would be more efficient and in many cases cost effective if individual schools had greater autonomy over purchases. Larger, more expensive, purchases such as IT should only remain above the level of the school where economies of scale could be achieved. A degree of flexibility would be welcomed. We would also seek for support from the local authority during the actual procurement process and some protection for schools if encountering difficulties with vendors of services or goods.

Q6. How can children, parents, communities, employers, colleges, universities and others play a stronger role in school life? What actions should be taken to support this?

Although we strongly support the current parent council structure, we feel that schools must do more to involve parents from socially deprived backgrounds. According to recent research (conducted with 502 respondents as part of our independent research to inform the review of the Scottish Schools (Parental Involvement) Act 2006) parents and carers:

- living in deprived areas are less likely to feed back to the school through formal means (5% of parents living in the most deprived areas would feed back this way compared with 20% in the least deprived areas);
- with a lower socioeconomic status are less likely to be interested in joining the Parent Council (52% of AB parents would be interested in joining, compared with 34% of DE parents);
- with a lower socioeconomic status are less likely to know what the Parent Council does (e.g. 32% of DE parents don't know if the Parent Council asks parent's views about what the children in the school are learning, compared with 17% of AB parents).

We would like the Scottish Government to work on projects and policies to break down barriers to involve these parents in school life. For example, in terms of accessibility we would like schools to have dedicated funds available to help encourage wider parental engagement by making it entirely accessible to the whole parent forum. These funds could be used in various ways such as paying for meals, transport, childcare, specialist tutors, craft materials and support homework clubs etc.

We do not feel that changes to Governance can impact on this.

It is important to bear in mind that attributing extra duties to parent councils could potentially deter certain parents from joining. Parents who engage with schools are volunteers with limited time and a range of abilities and experiences. In remote areas it may be extremely difficult to attract those with the correct skill set, and engaging parents in an urban setting already comes with its own complex challenges.

We would also like to see more encouragement of *Learning at Home* and a greater understanding of what this means.

Parents want head teachers to stay connected to the ground level work of the school. This would allow them to focus on improving education for their pupils but also allowing time to look beyond the walls of the school, at collaboration and other aspects of education. The role of the head teacher is pivotal, as they are the key to making links with the community and building relationships at all levels.

A greater use of volunteers in schools, encompassing parents and community members, would help in sharing a wealth of life experience as well as helping to compensate for budget constraints.

Q7. How can the governance arrangements support more community-led early learning and childcare provision particularly in remote and rural areas?

Parental involvement is difficult where many of the families live long distances from community centres and schools. Parents with children at rural schools have told us they feel their location adversely affects the provision of education and that rural schools are underresourced. This is attributed to the way funding criteria currently work. Parents think that the resource allocation decisions, made in an attempt to close the attainment gap, do not properly respond to the needs of rural areas.

Broadband provision is essential for preventing parents from becoming isolated as connectivity bridges the distance to schools and the wider community.

Overall, parents feel any changes could only have a positive affect if broadband arrangements are improved, particularly in light of online courses and an increased reliance on online materials. Additionally, parents would like all online resources to be available from any device, not only those in school. For example we have heard from parent councils in both urban and rural settings whose local authority have created them a generic email address. This is a useful concept but fails in practice as the parents can only access it within the school. The association between broadband connectivity and more remote rural areas can result in serious inequalities in terms of access to appropriate learning methods and materials.

Q8. How can effective collaboration amongst teachers and practitioners be further encouraged and incentivised?

It is important that collaboration takes place across all services involving children and families. Education is not a stand-alone system and schools cannot close the attainment gap on their own.

Parents are clear that well implemented collaboration between schools and clusters can improve standards, but collaboration is only useful when it facilitates the raising of standards on an equal basis between partners and those outwith. Local successes are put down to goodwill amongst able schools and strong demand for such initiatives by schools hoping to work with others.

Good staffing levels in schools would encourage collaboration, as it would allow time for implementation. We have heard from many parents who do not believe that in their school there is currently capacity for collaboration without it being to the detriment of the learning process.

Q9. What services and support functions could be provided more effectively through clusters of schools working together with partners?

Centralising resources such as quality improvement, speech and language therapy, and educational psychology could ensure consistency and best practice across schools. Although there have been successful examples of secondary schools sharing timetables in order to offer a wider range of subjects to students, strategic investment in ICT would help balance the time and/or financial constraints for travelling.

Greater collaboration between secondary schools and their cluster primary schools would aid transition and progression and help avoid variance in the levels of teaching from these primaries.

Q10. What services or functions are best delivered at a regional level? This may include functions or services currently delivered at a local or a national level.

We would urge that services delivered at a regional level are limited to those that do not involve interaction with parents or members of the public in general. Whilst we appreciate the value in saving money, parental interaction works best on a local level. We feel that we need much more information about the vision for regional functions to be able to answer this question fully, for example, if education is going to be removed at a local authority level then we would strongly urge for parents to be represented within the new structure.

Q11. What factors should be considered when establishing new educational regions?

It is important that regions do not create an unnecessary extra level of bureaucracy. Whilst parents accept the value in sharing good practice and saving money; they find it difficult to imagine how this structure is possible without additional bureaucracy. We do not feel that there is evidence that indicates educational regions are necessary, however, if Government is committed to their creation, we would be open to the suggestion that regions could be fluid entities and recommend that they are not too large.

Overall, we seek a system that is streamlined and efficient, with an emphasis on coherent communication, and collaboration not competition. It is key that the needs of local parents are not lost and that the parental voice is not diminished. Parents value the Parental Involvement Officer role in their local authority, it is a vital link that we would not like to see removed or reduced further, and would rather that Parental Involvement Officer levels were reinstated to previous higher levels.

Q12 What services or support functions should be delivered at a national level?

Workforce planning should remain at a National level, together with workforce terms and conditions. Parents have also suggested that supporting some services on a national basis would ensure equity, such as IT and free school meal entitlements.

Q13. How should governance support teacher education and professional learning in order to build the professional capacity we need?

If greater financial and budgeting powers were given to schools, head teachers would have to be trained in issues such as finance and HR etc. As previously stated, we would prefer that teachers are free to teach and were supported in these areas to ensure that head teachers are not overburdened.

We would also recommend more guidance to teachers on effective communication with parents, in particular on how to balance their own needs with the needs of parents.

We support the role of the GTCS in the development of teacher professionalism through maintaining and improving professional standards. Nevertheless, GTCS should not become a barrier for suitably qualified teachers (e.g from outside Scotland) to easily become registered to teach in Scotland, particularly since we are experiencing such a shortage of teachers.

Q14. Should the funding formula for schools be guided by the principles that it should support excellence and equity, be fair, simple, transparent, predictable and deliver value for money? Should other principles be used to inform the design of the formula?

Although we agree with the principles, we have heard from many parents who struggle with the concept that one formula can adequately reflect all of the differences in schools across Scotland.

In addition, whilst we welcome transparency in every area of education, there are concerns about accountability should a dispute arise.

Parents want reassurance that current funding levels will be protected and that the funding provided to schools will come with guidelines on its use. Parents have suggested to us that some budgets should be ring fenced and separated from devolved school budgets, particularly due to concerns over the funding for additional support for learning.

Q15. What further controls over funding should be devolved to school level?

Although we do not believe that parent councils should have a statutory duty to be involved in financial decisions, we believe that parent councils should be involved in school level decisions through statutory consultation, and that the consultations should be clear and transparent.

Almost all of the parents we have heard from do not want to have statutory financial responsibilities associated with running a school, but do want to be involved in shaping decisions. There is no great support for the "school governor" model to be introduced.

Q16. How could the accountability arrangements for education be improved?

Parents feel that in many cases there is a good level of accountability in the current system so would seek for this to be replicated in any new arrangement. For example, parents know there are mechanisms within the local authority for raising issues, and parents understand that GTCS will investigate issues of teacher conduct or competence. However, there are instances where accountability could be improved. Due to party politics, we find guidance that would lead to the best outcome for the child, isn't always followed by local authorities, and there is no consequence for the authority. We would once more emphasise that education should not be used by local authorities to score points against Government. Additionally, we are aware that if a Director of Education makes a decision against parent wishes, only elected members can over-ride them, and although these members are accountable through the ballot box, they are elected on wider issues than purely education, so there is a slight break down in accountability.

Q17. Is there anything else you would like to add regarding the governance of education in Scotland?

Scottish education has been going through many years of upheaval with the introduction of the new curriculum. We do have concerns about not giving time for consolidation before instigating more reorganisation.

The role of National agencies such as Education Scotland needs to be reconfigured to ensure they better support authorities, schools and parents to raise attainment.

It is essential that any changes are evidence-based to ensure that they are worth the disruption; that they are guaranteed to add value to the learning experience and wellbeing of our children and young people. We should not lose sight of the holistic aims of CfE, to enable each child or young person to be a successful learner, a confident individual, a responsible citizen and an effective contributor.

Finally, we have aimed to answer the questions as provided by Government, and not to predict plans. We would therefore welcome the opportunity to respond to any forthcoming Governance proposals in full and would urge that these future consultations are written in a more parent friendly manner. We would implore that the possible years of forthcoming consultation and legislation does not detract from our children receiving a world-class education.