



# the National Parent Forum of Scotland

## **Empowering Schools: A consultation on the provisions of the education (Scotland) bill**

The National Parent Forum of Scotland (NPFS) is pleased to have this opportunity to comment on many aspects of our system, in an effort to make it stronger and more accessible to all. However, we also wish to make it clear, from the outset, that we are proud of Scotland's education system. It is easy to dwell on negatives, but we frequently hear encouraging, good news stories from parents.

The OECD report *Improving Schools in Scotland* stated: 'There is a great deal to be positive about ... learners are enthusiastic and motivated, teachers are engaged and professional, and system leaders are highly committed'. We wholeheartedly agree with this, but also appreciate that the Scottish Government is striving for excellence and equity and NPFS want nothing less for Scotland's children and young people.

We understand the good intention behind many of the proposals, such as strengthening the 2006 Parental Involvement legislation in line with recommendations which came out of our research. However, we remain concerned, as we were in 2016, about the lack of evidence base underlying some of the other proposed changes. We are worried that the governance system of our excellent education system may be disrupted and unsettled with no real benefit for our children and young people, or the staff who support them.

Parents play an important part in the education of their child, from the minute they are born and right through their school years. Unfortunately, when presented within a consultation of this size and weight, we feel this aspect may perhaps be overlooked by stakeholders wrestling with fundamental changes to their governance structure. The Scottish Education system has the capacity to embrace working in association with parents - we must work together to find the best way to achieve this.

What follows in this consultation response is based on a wealth of evidence gathered over the last two years, including:

Evidence from existing sources, such as:

- The National Parent Forum of Scotland 2016 *Review of the Impact of the Scottish Schools (Parental Involvement) Act 2006*;
- the independent research from Ipsos MORI that informed this review;
- reports from the focus groups that were held to inform the NPFS response to the 2016 Governance Review.

Evidence from new sources:

- two recent focus groups (with a total of 43 parents) to specifically discuss these proposals: the East Renfrewshire group mostly consisted of local parents and the Glasgow group was attended by parents from across Scotland;
- an independent YouGov survey to get the views of 296 Scottish parents with children aged 3-18 who attend school (19% of survey respondents were or had been parent council members)<sup>1</sup>;
- submissions from parent councils around the country;
- feedback from our local authority volunteers from their parent council umbrella groups.

Please note, we have tried to present a balanced view, and include as many opinions as possible, but we are unable to present every individual viewpoint given to us. We represent parents with varying opinions, that can often contradict each other, so striking this balance can be difficult.

## **HEADTEACHER CHARTER**

The views of parents we consulted to inform this response fell into two distinct camps of being supportive or unsupportive of the Charter, largely dependent on whether they were currently satisfied with the skills and abilities of their headteachers. The views of those who generally support the Charter can be summed up by the following submissions:

*“[Our parent council is] fully supportive in all areas as we are lucky enough to have a great headteacher in place.”*

Parent council in Argyll and Bute

*“We should be able to trust headteachers. Parents normally trust their headteachers.”*

East Renfrewshire Focus Group

The majority of parents who were not in favour of the Charter did not share these positive experiences. They have real concerns over their headteacher’s current performance and have doubts about whether they have the relevant skills. They are worried that adding to an headteacher’s “power” and responsibilities would exacerbate an already difficult situation.

Overall, most parents, whether supportive or not of the Headteacher’s Charter in whole or in parts, are concerned about the extra workload on headteachers, particularly due to recruitment and managing a greater level of budget. Parents are also struggling to understand where the accountability would lie in the new system for a headteacher behaving inappropriately or ineffectively.

<sup>1</sup> Total sample size was 392 Scottish parents with children aged 3-18 years. Fieldwork was undertaken between 1st - 8th February 2018. The survey was carried out online. The figures have been weighted and are representative of all Scottish adults (aged 18+).

Parents have a multitude of concerns based on their own experiences and would find it helpful to be given a more comprehensive description of the enhanced role to provide clarity.

We feel consideration should be given to individual headteacher's roles, as duties differ according to school environments etc. For example, some parents from smaller schools have said their headteachers have a significant teaching commitment as part of their duties. They are naturally concerned on how this could be fulfilled with extra obligations:

*"When will they actually have time to do their job?"*

Focus group participant

Greater clarity is also required over what would happen in more exceptional circumstances, such as illness. Parents are asking who would be capable of taking on these responsibilities if the headteacher is unable to fulfil their role and the school lacks senior management staff with the appropriate experience or training. Parents also raised the issue of shared-headships, which are becoming a more frequent occurrence in Scotland: how would these headteachers cope with extra duties?

Parents value having headteachers in the classroom, working with the children, as much as they value good leadership. We agree with the GTCS, ADES and others that there is merit in considering a '*school charter*'. The team of school staff should be recognised.

It is also important that parental involvement is a duty for all teachers, not just the one at the top. Teaching unions, such as the EIS, have pointed to a lack of time, resource and support as barriers to fulfilling this aspirational role; we are similarly interested in how Scottish Government plans to address this.

**1. 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?**

We appreciate the value of the Curriculum for Excellence (CfE) as a curriculum that can be set by schools to suit their own locality. There is great strength in having a basic national curriculum with universal outcomes for every child in Scotland. This common core is flexible enough to suit local circumstances, but never loses sight of the four capacities. As one recent submission from a parent stated, many parents believe *"it is vital children in one part of the country are not taught entirely different things from another part of the country."*

We would remind Scottish Government that many schools are already setting their own curriculum successfully. We recognise that this means teachers can use their available resources and staff to adjust the curriculum to ensure it is suitable for their needs. However, we frequently hear from parents who are frustrated by the 'postcode lottery' of the arrangement, especially concerning the senior phase.

Parents regularly get in touch about many common frustrations, often caused by a lack of available teaching staff, in particular that:

- subjects their child may need for further education are not offered in their school;
- there are too many restrictions in the column choice arrangements in some schools, which could restrict the number of N5 or Higher subjects young people can sit;
- the varying stages that young people choose their senior phase subject.
- there are primary school variations of teaching strategies, such as phonic use or cursive script.
- there is insufficient non-teaching support to help deliver the curriculum.

Therefore, to enable headteachers to fulfil their increased role effectively and fully investigate all the possibilities within their cluster areas, they must receive adequate support and resource (including financial). For example, in order to design a curriculum that suits the entire school community there needs to be:

- help for secondary headteachers to collaborate with their primary cluster schools in order to aid transition and progression and help to avoid variance in the levels of teaching from these primaries;
- assistance for headteachers to explore the possibility of secondary schools sharing timetables so that a wider range of subjects can be offered to students;
- support to ensure the successful use of IT so that a larger number of subjects can be offered, such as the current facilitating of S1 to S5 Gàidhlig lessons from the Western Isles to Hazlehead Academy, Aberdeen via e-Sgoil.

Some parents suggested centralising some Additional Support Needs (ASN) resources, for example speech and language therapy and educational psychology, could ensure consistency and best practice across schools while alleviating some pressures on headteachers setting the curriculum. All schools should have access to these services, but some will need more than others. The Local Authority is best placed to have this overview but we appreciate that, for collaboration between local authorities, the new Regional Improvement Collaboratives may also have a role. However, other parents pointed to the success of having these services available in a 'campus style' school, giving better and earlier intervention.

Parents have concerns over accountability within the new system; they would like clarity over how the setting of the curriculum will be monitored and who will be responsible for ensuring headteachers are choosing an effective curriculum for raising attainment. Specific concerns raised by parents are that headteachers:

- might focus too much on high academic achievers when setting the school curriculum;
- may avoid subjects where it is hard to recruit teachers, or subjects that require more financial resources;

- may rely too much on an existing curriculum and fail to evolve/adapt;
- may not take into account the range of ASN in their students when setting their curriculum;
- may act on poor advice;
- may be placed under unnecessary pressure by overzealous parents.

For headteachers to become the leaders of learning within schools, and to make well informed decisions about the paths the school will take, it is more important than ever that they utilise the expertise of their staff, parents, pupils and communities.

## **2. 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?**

As confirmed by the parents in the focus groups, NPFS believes that parents should be firmly and actively involved in developing improvement plans. This level of involvement should be standard for all schools and established in ways which that suit whole school communities, not just headteachers.

Inconsistencies in the levels of parental engagement and collaboration within schools limit the scope of parental involvement and the potential learning of young people. Schools should grasp the recommendations contained in our *Review of the Impact of the Scottish Schools (Parental Involvement) Act* to ensure that that consistency is brought to this important area.

The school needs to explain to parents why improvement plans matter to their child. Parents need to understand why certain issues are being addressed, such as responding to pupils' literacy or numeracy assessments at the end of the year. Schools should fully explain the rationale behind their improvement plans (i.e. what their concerns are and what they are thinking of doing to address this) prior to consulting and seeking agreement from parents and other stakeholders.

Focus group participants reflected on the best ways to ensure that the general parent population is involved in the development of plans to improve schools. It was felt that that this should be a continuous and long-term process, with parents supported in learning how to engage with schools and given help to understand why improvement plans are important.

Too many of the changes in recent education policy have never been fully explained to parents. It will take a long time for parents to feel confident in understanding the full system, as their own education was significantly different. Parents in the focus groups, particularly those who were members of parent councils, recognise the difficulties in getting parents involved in the life of the school. This is an area that will be challenging for headteachers, schools and parents. However, there are strategies that schools can introduce to remove tangible and perceived barriers to engagement, particularly in relation to school improvement. Given their importance to all those within the school and beyond, we will address these in the parental involvement section.

Headteachers should think more carefully about how they engage and communicate with parents to ensure information is as accessible and relevant as possible i.e. consider how they share information, how they select which documents are shared and be mindful of the type of language they use. Much more engagement should take place throughout the school year, this would make it easier for parents to digest and the smaller chunks of time would be more manageable for staff.

Focus group participants suggested many ways of involving parents in the process, such as:

- the school improvement plan being put on the school's website and parents can choose when they want to get involved
- informal annual coffee mornings being held where parents are asked about the school improvement plan. This is seen to be beneficial as it reaches out to the wider parent population.
- the creation of monthly headteacher surgeries where parents can attend and speak to the headteacher without an appointment.
- schools using their Pupil Equity Funding to employ specialist workers to engage those potentially disadvantaged.

As we have previously stated, Scottish parents have very little desire to return to a model akin to school boards. Parents do not want new collaborative procedures to be too onerous on volunteer bodies, such as the parent council, but would like the process to become more meaningful and less bureaucratic than at present. We maintain that local authority staff are best placed to support this work.

Our East Renfrewshire focus group parents felt they should be involved with decision-making processes and be informed about a school's plans but that, ultimately, responsibility for decisions should rest with headteachers and teachers:

*“At the end of the day, it is the headteacher and teachers’ duty to make decisions on school improvements and policies. They are the professionals. We can be involved, but they should make the decisions.”*

East Renfrewshire Focus Group

They felt that as long as parents have a route to access Headteachers and teachers, a lack of continuous engagement is not necessarily a problem. However, this was acknowledged to be an ‘*East Ren view*’ as it is an area where young people perform generally well in schools and there are good relationships between parents and headteachers.

Unfortunately, the responses to our call for evidence for the *Review of the Impact of the Scottish Schools (Parental Involvement) Act* found that positive feelings towards headteachers are not universal. As a result, parents would like to see the accountability procedure clearly laid out in case families feel the school improvement

plan is not addressing their needs. This is clearly a matter for parent council and their relationship with the school and headteacher.

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

The main advantage is that the plan becomes one that truly reflects the experience and needs of the young people and their families within a school community and can pick up its many nuances. Monitoring these plans is a key part of this process for families and we would urge those responsible to ensure that parents are asked directly for their views in an accessible manner. It is not sufficient for schools to report on what they believe their parents think, parents must be asked directly.

A school working successfully in tune with all of its stakeholders can only be seen as an advantage in itself. However, in our opinion, the main disadvantage is that there is a disconnect between the development of school improvement plans at a grass roots level and the regional collaboratives, which cover a huge number of schools. This will be discussed later in this response.

**4. 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?**

Most parents felt that recruitment, in terms of selecting the right staff for their team, was felt to be a core responsibility of headteachers and best left to individual schools. This was seen as particularly important in the recruitment of additional support needs (ASN) provision, where specific knowledge is most valuable.

This already happens successfully through Devolved School Management in many areas, such as Glasgow, and could be used as a model for how Local Authorities can support headteachers with the administrative and bureaucratic aspects. While the same process exists in East Renfrewshire, the focus group suggested that senior staff recruitment decisions need to be made by a panel, so that there is an opportunity to discuss, scrutinise and challenge the headteacher's choice. We agree that headteachers should continue to cooperate with their local authority in its on-going role as employer i.e. in its duty to manage the allocation of probationers, student teachers, surplus staff and compulsory transfers.

However, parents see several potential issues arising (in addition to the already stated stretch on resources). Focus group participants had a range of concerns, such as:

- where headteachers can decide on their own promoted post structure, this may result in a significant portion of their budget being spent on management,

when a lot of parents would like it to be spent on auxiliary staff and other resources instead.

- if headteachers were responsible for staffing they may make decisions motivated by saving money rather than improving education for pupils. One participant gave the example of a headteacher potentially moving expensive qualified teachers out of their roles and hiring cheaper, newly qualified teachers (NQTs) instead.

Parents did recognise that if headteachers make poor decisions they will be held to account:

*“That is their job. If it [a staffing decision] isn’t right, they are ultimately responsible”.*

Focus group participant

Nonetheless, poor staffing decisions would have a major impact on our children and young people. We feel Scottish Government should provide a rigorous monitoring system to ensure that these decisions are for the benefit of all. This system needs to be deal with any potential issues in a timely manner, as the impact on our children could be disastrous.

### **5. 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?**

Parents feel that, fundamentally, schools are under resourced and no alterations to the allocation of funding will change this. Parents frequently describe the financial strain on their schools. In a recent YouGov survey of 382 Scottish parents with children aged 3-18, only 29% agreed that their local authority prioritises education enough when setting their budgets.

In particular, parents feel that children with additional support needs (ASN) 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. If the inclusion agenda is to remain a priority, parents feel that if funding is required to provide specialist services then they should be provided. Parents also suggested that children with ASN need allocated more specific financial resources, in particular that ASN should be a qualifying criterion for additional funding such as Pupil Equity Funding.

An overwhelming majority of parents who have engaged with us are concerned that additional financial and legal responsibilities could exacerbate the headteacher shortage. The East Renfrewshire focus group highlighted the risk that additional legal requirements may have the effect of reducing the number of candidates who seek to become headteachers and noted that there may, at times, be a limited financial differential relative to the additional duties between a depute and the headteacher role. 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, some parents suggested that business managers might be required for any additional administrative tasks, yet they feel this is a no-win situation as they do not want scarce financial resources diverted to provide business manager salaries. However, we recognise that support can still be provided by the local authority to mitigate the need for such posts. We have heard parents and teachers say that the headteacher is not an accountant and nor should they be. If the outcome of the proposed changes leads to an increase in school based professional support, then we would find this unacceptable given that parents believe that funds should be spent on the learning and teaching resource.

However, parents do see some value in headteachers having more input in the field of procurement, specifically, tailoring products and services to the individual schools. They feel that it would be more efficient and, in many cases, cost effective if individual schools had greater autonomy over purchases. Current procurement systems place additional restraints on headteachers and the majority of parents feel that local authority contracts do not always provide best value for money. Larger, more expensive, purchases such as IT should only remain above the level of the school where economies of scale could be achieved, and parents pointed to examples where economies of scale are not currently in place. A degree of flexibility would be welcomed. However, we would also seek for support from the local authority during the actual procurement process and some protection for schools if they are encountering difficulties with vendors of services or goods.

## **6. How could local authorities increase transparency and best involve headteachers and school communities in education spending decisions?**

As stated in our *Review of the Impact of the Scottish Schools (Parental Involvement) Act*, parents have no desire to return to a school board structure and for parent councils to veto all funding decisions. However, school spending should be published and publicly available and there should be a clear route for any stakeholder to ask a question or raise a concern.

A recent YouGov survey of 296 Scottish parents with children aged 3-18 years who attend school, concluded that only 26% of parents thought that their school had spent additional spending (such as Pupil Equity Funding) well this academic year, with only 7% strongly agreeing. 43% of parents replied 'Don't know' and 23% 'Neither agree or disagree'. We accept that this could be because parents are waiting for the reporting from the first year of spend of Pupil Equity Funding, to deem whether the money was spent well. However, it's more likely that it indicates a gap in parents' knowledge of the purpose of additional spending (such as Pupil Equity Funding) and a lack of transparency in spending decisions that are specifically designed to raise attainment in their school, and thereby directly impacting their child. We hope schools will explain these decisions to parents and, later in 2018, provide an evidence base that their PEF spend has been valuable in raising attainment. However, in a collaborative model, parents should have this information at the outset and we do not believe this is the case at present.

## **7. What types of support and professional learning would be valuable to headteachers in preparing to take up the new powers and duties to be set out in the Headteachers' Charter?**

The duty to collaborate is a significant part of the Bill and there needs to be clear and concise information on the headteacher's role in this. The relationship between schools and parents, and the anticipated improvement in engagement, learning and teaching and outcomes for young people, all flow from effective collaboration and engagement. It is crucial, therefore, that support is provided to ensure this is applied consistently across schools and local authorities.

If greater financial and budgeting powers were given to schools, then additional training would have to be provided for headteachers, such as finance, HR etc.

We recommend more guidance to teachers on effective communication with parents, in particular on how to balance their own needs with the needs of parents. This is a major issue for parents and a greater emphasis should be provided during ITE to this key aspect of parental and school relationship.

As per recommendation 19 of our *Review of the Impact of the Scottish Schools (Parental Involvement) Act*:

Parental engagement should be a key element in any new leadership programme and continuous improvement training programmes.

### **PARENTAL INVOLVEMENT**

The majority of parents we have consulted with, and many other stakeholders, are broadly supportive of the proposed improvements to the legislation. However, some are concerned that the creation of a legal duty to collaborate has the potential to put parents off becoming members of the parent councils, by making their duties too onerous.

While these changes are entirely appropriate, Scottish Government must address some of the more fundamental issues currently acting as barriers to parental involvement in Scotland and recognise that resources are required, in particular financial and teacher training.

We appreciate there are concerns about how teachers will engage with the full parent body, due to teacher workload, and we will address these later in the response.

## **8. Are the broad areas for reform to the Scottish Schools (Parental Involvement)**

### **Act 2006 correct?**

Overall, we welcome the areas of reform and are pleased that many aspects of our *Review of the Impact of the Scottish Schools (Parental Involvement) Act* have been taken forward.

### Collaboration with the parent council

We feel it is correct that the duties on headteachers to work collaboratively with their Parent Councils on substantive matters of school policy and improvement are strengthened. There are instances of excellent practice around the country, where the current duties on headteachers to inform and consult with their Parent Council are working very well, but unfortunately this is by no means country wide. Independent research by Ipsos MORI to inform our *Review of the Impact of the Scottish Schools (Parental Involvement) Act* found that in the current system, parents are frequently consulted only when the decision has already been made and they should be actively involved much earlier in the process. We therefore welcome the proposed revised duties to work in a collaborative way with their parent council. It would have been helpful for Scottish Government to have provided at this stage what they feel effective collaboration looks like, but we will provide some suggestions further in this response.

Stakeholders, including some parents, have told us that they do not think '*parents are qualified*' to influence substantive school matters. We would argue that a parent knows their child best and therefore knows what is best for them. In this proposed bottom up approach, a school that is meaningfully engaging with their parents should be able to reflect this parental knowledge of each child within their planning. As stated in Q.3, parents in our focus groups told us that they believe all parents, including parent councils, will only be interested in engaging with school improvement plans when they understand how that plan relates to their own child. The presentation of plans must encompass this and not be a purely bureaucratic process.

Some focus group participants felt there was a difference between consulting parents on the curriculum, as opposed to school improvement and school policies. For example, the East Renfrewshire focus group explained they felt they did not have the necessary skills and do not want to be involved in curricular design. They felt that the headteacher and their Management Team were best placed to design their local curriculum to suit the school and their young people. The Glasgow focus group explained not all parents want to be involved in all aspects of the curriculum, but that there are certain things that parents can have an impact on. For example, one participant described a school's choice for pupils to take Mandarin in primary school when those pupils would not be able to continue studying the language in secondary school. In this case, parents should be able to question the decision and suggest alternative curriculum choices.

### Involving the wider parent forum

According to Ipsos MORI research, 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).

It is important that headteachers engage with these parents but it is equally clear from this data that the current parent council mechanism will not be appropriate. We therefore welcome the duties on headteachers to communicate with the wider parent forum. However, we would remind Scottish Government that for this legislation to be effective, there is a large amount of groundwork to be done in many schools. According to our research, specifically with ethnic minority parents, the fundamental aspects for involving more parents is ensuring that the school is welcoming and the headteacher is open and approachable.

In a recent YouGov survey of 296 Scottish parents with children aged 3-18 who attend school, 71% feel their school is welcoming to all parents. As this should be a standard feature, school communities need to work together to achieve 100%. It is also worth noting that the responses to this question differed according to socioeconomic status: 75% of parents in the higher (ABC1) social grades felt their school was welcoming, but this dropped to 67% for the lower (C2DE) grades. More concerning, given the proposed strengthening of headteacher duties, only 60% of parents felt their headteacher was open and approachable. This figure drops to 54% of parents in the C2DE socioeconomic bracket. For this legislation to be at its most effective, these numbers need to significantly increase.

People First (Scotland) Parents' Group, a self-advocacy group of parents with learning disabilities, shared what doesn't work well with us and this was echoed in our *Review of the Impact of the Scottish Schools (Parental Involvement) Act*:

*"The school doesn't send letters – they send encyclopedias!"*

*"there were 6 leaflets in my son's bag – none in easy read."*

*"I don't know which letters are important because I can't read them."*

*"I have to use my support time to go through all the information, so I miss out on other things that my support should be doing."*

NPFS recognise that many of these sentiments are not unique to parents with learning disabilities. Only 51% of respondents to our call for evidence for the *Review of the Impact of the Scottish Schools (Parental Involvement) Act* felt that 'staff talked to them in a way that would suit everyone'.

To effectively communicate with the wider parent forum several factors should be addressed as matter of course, including:

- the removal of educational jargon
- the removal of any technical barriers

- establishing measures to mitigate the impact on those that have English as an additional language
- provision of easy to read formats.

As per recommendation 9 of our *Review of the Impact of the Scottish Schools (Parental Involvement) Act*, we believe that:

Communication materials to parents should reflect the key principles set out in the Parental Communication Plan for the National Improvement Framework.

NPFS frequently hear from teachers and parent councils who are struggling to engage with the wider parent forum. Focus group participants discussed some of the reasons (also outlined in the *Review of the Impact of the Scottish Schools (Parental Involvement) Act*):

- Many parents do not have the time to be heavily involved in school decision-making.
- The expense of involvement is a factor; many parents rely on public transport to reach their child's school, which can be costly.
- Many parents do not have the confidence to engage with the school and this can be related to having English as a second language.

In all of these cases, it was stressed that schools should recognise that it is not the case that parents cannot be bothered to engage. Instead, schools need to play a role in following up on why parents are not feeding back. We agree completely that schools should not just accept a low level of engagement, they should fully investigate why, and remove as many barriers as possible. For example, the evidence from People First (Scotland) Parents' Group pointed to crèche provision, and longer parent's evening slots as something that works.

As per recommendation 8 of our *Review of the Impact of the Scottish Schools (Parental Involvement) Act*, we believe that:

The Scottish Government should ensure that governance and funding arrangements for education help to address the full range of barriers that prevent parents becoming more involved in their child's school, including financial or capacity reasons. The Scottish Government should make clear that funding streams to schools may be used in a wide variety of ways which may include identifying and raising awareness of the barriers to parental engagement. These may include: helping to pay for parent transport costs; funding childcare to encourage parents to attend school activities, while bearing in mind that parents' working hours vary widely; and to provide additional resources to encourage more parents to get involved and engaged in learning.

According to a recent YouGov survey of 296 Scottish parents with children aged 3-18 years who attend school, only 24% of parents feel that their school spends enough money in helping parents get more involved.

Ipsos MORI research emphasised the importance of meaningful direct communication with parents, but parents often tell us this is lacking. For example, the research found that parents would like to receive more information on their child's learning. 61% of parents received this at least once a term and 15% never.

Face-to-face consultation between parents and teachers is seen as having upmost value.

A recent YouGov survey of 296 Scottish parents with children aged 3-18 years who attend school, parents found that only just over half (52%) of parents are satisfied with the amount of one to one time that they receive with their child's teacher(s). Focus group participants suggested improvements such as arranging more than one parents' evening per year, or through headteachers having an open-door session once a month. One participant described a school where three coffee mornings per year are held. These are informal events where parents can discuss how they feel, including about school policies, and this was seen as a useful method for engagement. Any informal events such as 'meet the teacher' events familiarise parents with the school and make them feel more comfortable.

### What is Good Collaboration?

We believe many schools have managed to establish the basic groundwork for good engagement, including:

- creating a welcoming environment
- making school activities more flexible to fit working parents
- giving sufficient notice for meetings and events
- working with potentially disadvantaged parents, particularly those who have had a negative experience of school themselves, to ensure they feel more comfortable in the school environment
- direct communication to increase awareness.

Collaboration is a natural process in these schools and this should be possible in all schools, once the necessary groundwork is established. Parents have told us there should be no beginning and no end to collaboration, the process should be continuous, particularly as each August a new group of parents arrive in every school.

Parents in the focus groups discussed methods to aid collaborative working and, in many cases, they are those which aid engagement generally. Parents agree that, in order to reach as many parents as possible, there should be as wide a range and variety of channels of communication as possible. For example, not all parents use social media and some cannot engage electronically, therefore these methods of communication are unlikely to be successful in reaching all parents. For communication to be collaborative, engagement with parents needs to be more than specific parents coming to teachers for specific points. The best way to communicate with parents is in *"every way that is humanly possible"*.

In order to hear the voices of lots of different parents, there needs to be variation in the types of consultation that headteachers undertake, as not all parents will respond to the same forms of engagement. Focus group participants suggested that, in some schools, the parent council can be involved in the formulation of the questions that need to be asked and then the wider parent forum should be asked to respond.

It was suggested that a survey of parents could be conducted, as a way of hearing a broad spectrum of views. One participant described how, in their child's school, a survey is conducted every three years to explore parents' views, for example, whether their child is being sufficiently challenged in school. These views should feed into decision-making. Other participants proposed that, alternatively, a survey could be conducted every two years or every year.

An annual survey conducted during parents' evening was suggested, as one participant had found that this had resulted in useful feedback in their child's school. That survey covered questions about various aspects of the school. Alternatives to conducting a survey were discussed, as it was felt that there were other beneficial ways to engage parents. Inviting parents to come in and have a cup of tea was offered as way to reach parents. Focus groups can be arranged with parents who have children with something in common e.g. ASN; having English as an additional language; or being from the same year group. This could help parents feel less intimidated and boost levels of engagement.

Overall, parents need to know why they are being engaged and why it is relevant as well as the benefits to their child. They need to understand how decision-making impacts their child. If parents know the implications for decision-making for their child, they will be more likely to get involved. It should be remembered that not all parents need to attend every meeting for parental engagement in a school to be deemed successful, but each and every parent needs a link with the school.

### Legal Definitions

We agree that the legal definition of parental involvement should be revisited, ensuring that the definition is sufficiently broad and covers all aspects of parental involvement and engagement. We all need clarity in this. We would urge Scottish Government to visit the work of Goodall and Montgomery (2014). This work considers the different levels of involvement and engagement: parental involvement with schools (such as helping in class); parental involvement in schooling (such as helping with homework); parental engagement as active involvement in, learning encompassing a focus on the relationship between parents and their children's learning; moral support and encouragement; and Guidance and advice.

While parental involvement with schools and schooling is important, true parental engagement can make the biggest difference to the attainment gap. The more parents engage in their child's learning, the more likely it is that they will help raise their child's attainment. What parents do with their children at home and throughout their education is much more significant than any other factor open to educational influence. (*Desforges and Abouchaar, 2003*)

We are pleased that the Scottish Government are to give a prominent place for parental engagement in learning, learning in the home and family learning. As per recommendation 6 of our *Review of the Impact of the Scottish Schools (Parental Involvement) Act*:

The Scottish Government should bring forward proposals to ensure there is a measurable increase in parents' access to family learning programmes and interventions that support improvements in learning at home. Initial concentration

should be on those experiencing socio-economic inequalities and most in need. The Scottish Government should ensure that existing funding commitments to improve educational attainment (e.g. Scottish Attainment Fund) are aligned to, and support, this area. Future funding should consider inclusion of early years and childcare.

### Demands on headteachers

We are aware that various stakeholders (including parents) have expressed concerns that an increase in collaborating with, and involving, parents may cause an increase in the teacher workload. Although we believe that the time spent on parental involvement and engagement should be seen as important as time spent on other aspects of a headteacher's duties, we are not advocating a large amount of extra work. As we stated previously, collaboration will occur easily in schools that prepare the necessary groundwork. The suggestions are not necessarily about doing more, but about doing things differently and in a more effective manner. Schools must evaluate their current strategies to ensure they are appropriate and effective. Communications should be more meaningful and reflect family needs.

We have previously stated that parents criticise personal education reporting in Scotland, stating that it is ineffective, that reports are not individual enough and that much of the information is meaningless. However, there is a continued demand on staff to issue these reports. Educational professionals need to think more creatively about what type of reporting would be most useful. We recognise that perhaps more possibilities would be available in a school run by an empowered headteacher. These proposed changes to school governance offer real opportunities.

### Measures and reporting

We agree with the requirement for a review of parental involvement strategies within three years of initial development and at least every three years thereafter, and the requirement for all parental involvement strategies to include clear objectives and measures of success. Our *Review of the Impact of the Scottish Schools (Parental Involvement) Act* found substantial variation between the approaches of different local authorities, in terms of the publicly available documentation and information related to parental involvement. While local authorities followed the 2006 guidelines, very few of the strategies available online were up to date, had details of how or when they would be reviewed, had evidence of parent consultation or had clear objectives.

Focus group participants suggested that local authority staff would be best placed to monitor parental engagement in schools. There were concerns over adding to statutory duties on parent councils themselves, as this was thought to be too onerous on a voluntary group.

### Updates to statutory guidance

Our *Review of the Impact of the Scottish Schools (Parental Involvement) Act* recommended that statutory guidance on parental involvement should be updated in line with changes to the 2006 Act: to provide a summary of schools' and parent councils' duties in relation to the Equality Act 2010 and to provide further



comprehensive guidance on the 'learning at home' strand of the 2006 Act. We are pleased that, as part of their reforms, Scottish Government will update the statutory guidance to reflect the amendments to the 2006 Act.

It is important to bear in mind that attributing extra duties on 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. While we are supportive of clarification to equality duties, the resources must be available to support parent councils carry out their work effectively. For example, Recommendation 14 of *Review of the Impact of the Scottish Schools (Parental Involvement) Act*:

Education Scotland should take further steps to promote the benefits and ways for parents to get involved in their child's learning. This should include the development of advice on Parentzone Scotland and the refresh of the 'Parent as Partners in their Children's Learning' toolkit.

#### Digital Involvement

Digital learning is clearly a method to involve parents that could be truly utilised. Recommendation 17 of *Review of the Impact of the Scottish Schools (Parental Involvement) Act* stated:

The Scottish Government should provide dedicated funding to support parental engagement in its Digital Learning strategy, including infrastructure and continuing professional development for staff. Scottish Government, Education Scotland and National Parent Forum of Scotland should work together to clearly define how digital technology can support the parental engagement agenda, with a view to developing clear requirements and a clear strategy to deliver those requirements. As part of its implementation of the Digital Learning strategy, Scottish Government, Education Scotland, schools and local authorities should work together to improve broadband access for learners and teachers in schools and the wider community.

However, we are dismayed that there is no commitment at all to make GLOW accessible to parents or to provide a national platform in its place.

#### Parental Involvement Steering Group

We believe that an important part of the bottom up approach being advocated for in this revised system, is Scottish Government ensuring that the voice of stakeholders is clearly represented at this national level. We strive to fill this role as an organisation but also remind Scottish Government of the key role the Parental Involvement Steering Group should play. As per recommendation 11 of our *Review of the Impact of the Scottish Schools (Parental Involvement) Act*:

The National Parental Engagement Steering Group should be retained and its role should be strengthened as a working group helping to influence, challenge and guide national policies.

Scottish Government should make certain that all stakeholders involved in the running of the group ensure that the group is seen as a valuable resource who are able to provide meaningful contributions to policy.

**9. 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 curriculum design?**

Once more, the pace of change set by Scottish Government has served as a hindrance to this consultation. While we more than welcome the proposed wider activity, including:

- a national action plan on parental engagement and family learning
  - the annual improvement cycle (which includes a “driver” on parental engagement)
  - 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
- However, it would have been very beneficial if the forthcoming Parental Engagement Action plan and all other proposals had been completed, and a draft published, prior to responding to this consultation. This would have enabled all stakeholders to comment more comprehensively on the proposals.

In our response to question 8, we outlined the manner in which we would like to see headteachers conduct meaningful consultation with parents. We recognise this is not a ‘one size fits all’ approach and Scottish Government should ensure that, while strengthening the Act, they do not make it too prescriptive in nature.

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

As recommended in *Review of the Impact of the Scottish Schools (Parental Involvement) Act*, we do not think there needs to be a blanket application of the legislation. In general, early learning and childcare settings engage well with their parents on a day to day communication level. We do not feel that parent councils would be a desirable development, but suggest that schools with nursery provision should actively promote the parent council to nursery parents. It is helpful if parents of the ante preschool children are actively encouraged to attend the primary school parent council. Similarly, it is also helpful if parents of P7s are invited to their cluster high school parent council.

We believe changes should include, but also take account of the unique nature of, private and voluntary-sector settings providing funded early learning and childcare in partnership with local authorities and funded child-minding places.

For the attainment gap to be closed, the home learning environment must be addressed. The health and education sector need to work more closely together on this. Healthcare workers and voluntary organisations, are the associations that generally visit at home, so there needs to be workforce development to encourage this.

Research has shown that around 80% of the variance in how well children do at school depends on what happens outside the school gates (*Rabash et al, 2010; Save the Children, 2013*). Children's learning journey begins long before they start school and they continue to learn at home and in the community. Nurseries should be encouraged to support their families to take part in learning at home, by clarifying what forms this can take, building on what parents already do to include learning in their everyday activities. This should take account of possible costs involved.

Discussion with our colleagues in Parenting Across Scotland (PAS) has supported these ideas and PAS have also suggested that it would be helpful for the legislation to take full account of the Early Years Quality Action Plan, and that the Care Inspectorate could issue Practice Guidelines specific to parental involvement and learning at home.

## **PUPILS**

NPFS fully support that all schools in Scotland should pursue the principles of pupil participation. However, we have concerns that it will require a large financial resource to be achieved and would support more 3rd sector involvement with young people to ensure full pupil participation in our schools.

### **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 Headteachers' Charter?**

We are pleased Scottish Government is committed to involving children and young people in decisions about their education, in line with their rights under the UNCRC.

We agree with our colleagues in Children in Scotland that Scottish Government should look at how it can support headteachers to better understand meaningful participation, going beyond pupil councils and exploring how to involve their pupils with decisions throughout the school. We further agree that, despite pockets of good practice, there is a lack of understanding of the considerations needed to meaningfully include all aspects of the school community and the breadth of issues they can be involved in.

As with increased parental involvement, the resources must be present for these proposals to be effective. We feel that third sector organisations would be better placed to carry out this work in Scottish Schools.

### **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...?**

We agree that a general duty would be more appropriate than specific duties. Our research for the *Review of the Impact of the Scottish Schools (Parental Involvement) Act* found that many parent councils did not feel they were representative. We think pupil councils would have the same issue.

Focus group participants explained that it should not only be the voices of a select few who are heard, and a young person themselves explained to NPFS that pupil councils are not at all representative of the majority of pupils in school. However, we share the concerns of our colleagues in Children in Scotland that the principles identified in the document could be far clearer. Clearer principles would be extremely valuable, particularly for headteachers who are not so confident in supporting meaningful participation.

## **REGIONS**

Parents have often expressed their dismay to us, when what they perceive as good education policy set at a national level is not carried out in their local authority; often due to political allegiances. We hope that the accountability systems around the Regional Improvement Collaborative (RIC) arrangement aims to counter this and remove some of the local political wrangling from our education system. However, as the RICs have already formed on a voluntary basis, we are unsure why legislation is deemed entirely necessary.

Communication explaining the RIC's function and purpose is required on a national level to educate all stakeholders, including parents. It may also be useful for these stakeholders to understand the rationale behind the grouping of the regions, as parents have rightly questioned the huge variance in size in terms of geography and numbers of schools.

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

Local authorities are perceived 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. Therefore, while we entirely support the concept of collaboration, we have serious concerns about the loss of local authority improvement plans, local authority support and generally the power held within education at a local level.

Parents who have engaged with us, struggle to believe that a region can be responsive to their individual family and school's needs. 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; we would prefer that Parental Involvement Officer levels were reinstated to previous higher levels. A submission from an East Lothian Primary school explained that it is not clear from the consultation document what local authority staff will remain and:

*“if there are not such liaison staff, we are worried about how the collaborative will communicate effectively with so many different schools”.*

As per recommendation 7 of our *Review of the Impact of the Scottish Schools (Parental Involvement) Act*, we believe parents should be represented within the regional structure and currently we are unsure of the parental role within any of the collaboratives. The pace of reform has led to only a few of the RICs engaging in any form of consultation with the parent body so far. Parents in our focus groups felt that the RICs should have meaningful communication and consultation with all parents to ensure a bottom up approach.

Parents suggested that it would be appropriate for RIC leads to routinely attend local authority parent council chairs meetings; and that there should be parent seats on any regional education committee or advisory groups formed (as there would be in the current system at a local authority level). Some parents pointed to the standard membership of education committees, where religious representatives have the right to participate, and felt a similar role for parents would be appropriate. However, some parents also stated that ‘board’ membership is not sufficient and that there should be a duty on the RICs to meaningfully engage with all stakeholders, including parents. As with schools, RICs should use every available method to engage with stakeholders and remove every barrier that is in their power to do so.

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

NPFS reps have discussed previously with Scottish Government, whether the annual renewed plan of NIF is necessary as, thus far, it seems a bureaucratic process resulting in little year on year change. It would be preferable to convey progress on objectives and the next steps within the plan to achieve these. We believe this would also be applicable to regional 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?**

Parents generally agreed that reporting should be annual or two yearly and suggested that it makes more sense for reporting to follow the academic year cycle. If monitoring was clear, transparent and frequent then every two years could be sufficient. Again, reporting should clearly show progress on the objectives and indicate the next steps. The improvement plans should be treated as live documents and information on each area of the plan should be available, as and when it can be. This should be easily and readily accessible at any point in time.

#### **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, as above.

## **EDUCATION WORKFORCE COUNCIL**

Many parents who have engaged with us struggle to understand why this new council is required. While they understand the desire to increase professionalism they aren't sure this isn't just added bureaucracy. Many parents told us they think that the GTCS currently perform their role well and that a new system will cost unwarranted sums of money with no impact on children and young people's attainment. If it is seen as necessary to have another regulatory body for other staff in schools some parents suggested it could be more cost effective and less disruptive to run this alongside the GTCS rather than a complete restructure.

NPFS are concerned to hear from colleagues in Wales that the roll out of an EWC has experienced many teething problems and would urge Scottish Government to learn from these experiences. However, some parents working in the medical profession were encouraged by the introduction of the Health and Care Professions Council (HCPC) and thought Scottish Government could learn from this. While the changes at this level have the least direct impact on parents, the quality and supply of staff clearly has a major impact on children and young people. We feel it is vital that the changes are communicated well to all families to avoid misconceptions and misunderstanding. Having a nationally acceptable and coherent standard and expectation of the entire workforce, which understands the roles which non teaching staff play is welcomed by many parents.

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

Opinions on this varied amongst the parents who engaged with us. Some agreed with the GTCS: that the professional body that holds a register of professional practitioners should also regulate those professionals. Other parents cited the example of the HCPC, who successfully regulate the professionals alongside each individual professions' professional body.

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

There are concerns that the proposed Education Workforce Council could form a barrier for some staff who are sorely needed in Scotland's schools, such as ASN auxiliaries. We trust that Scottish Government will ensure that it does not prevent parents volunteering in the classroom, and other valuable input from the wider community.

We can understand the purpose of some staff being grouped under the same regulatory umbrella, as currently happens with instrumental music instructors.

### **19. Are the proposed functions of the Education Workforce Council for Scotland appropriate?**

They seem appropriate to most parents who have engaged with us.

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

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

Scottish Government should be aware of the financial burden on the registration of low paid workers, such as classroom assistants, as the costs involved will create a real barrier to employment. A scale of registration fees, appropriate to the pay scales of each role, would be welcomed.

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

The fees should be based on the costs of the organisation carrying out its duties. These costs should be clearly and transparently reported.

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

The NPFS value our place on the General Teaching Council of Scotland and trust that any new governance arrangements would also involve the parent voice.

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

We feel the name is perhaps too close to the Scottish Education Council and this may cause confusion. We also think it is highly likely that people outwith the profession will still refer to it as GTCS.

Parents have suggested the Education Workforce Association for Scotland would be more helpful, but many feel the name is arbitrary.

**CONCLUSION**

To conclude, parents view many of these proposals in both a positive and negative light. Many of them are seen to be truly aspirational but thought to be impossible to implement effectively on the current level of resource.

The Headteachers' Charter contains effective ideas, in principle, but parents seek further information and clarity. Parents also emphasise the need for extra financial resource and training.

The Regional Improvement Collaboratives rightly promote collaboration, but parents fail to understand how they can be responsive at a truly local level. There are real concerns about how the parent voice will be represented at this level and how the RICs will engage with families.

Pupil participation is undoubtedly our children's right but, again, will require time and financial resource to be effective.

The Scottish Education Workforce Council seems, to parents, to be a stretch on financial resources that would be better spent in the classroom, rather than replacing an organisation who are currently respected and effective.

We welcome many of the proposals on parental involvement and are optimistic that the forthcoming Parental Engagement Action Plan will be a valuable development. However, we would like to emphasise that groundwork is required; in our opinion, it can only be rolled out equitably through teacher training and monitoring at a local authority level.

Buy-in from all stakeholders is necessary for this legislation and its approach to be effective: from politics to ensure a smooth transition through parliament; from teachers and their unions to ensure these changes are welcomed and able to be fully implemented; and from all parents to ensure good practice in reality. Without this the legislation will be ineffective at best, and extremely challenging and disruptive at worst.

From a parent's perspective, we hope Scottish Government can implement these changes with no disruption to our children and young people, but in the current climate are unsure how this would be possible.

Kind regards,

Joanna Murphy, Chair, National Parent Forum of Scotland

*Joanna Murphy.*