

Reforms proposed by the Independent Review of the Skills Landscape (SDLR) and Initial Priorities for Purpose and Principles



SCQF Partnership Response

1. Introduction

The Partnership wholeheartedly endorse the Independent Review of the Skills Delivery Landscape's (RSDL) conclusion that the full extent of opportunities for the Scottish Credit and Qualification Framework (SCQF) to deliver parity of esteem, clearer learner pathways and diversity of choice to meet the needs of learners have not yet been consistently exploited across the education and skills landscape.

The founding partners and 'guardians' of the SCQF Partnership (SQA, CDN, Universities Scotland and QAA) all agree that the Framework needs to be a key part of the underpinning infrastructure of a reformed qualifications and skills offer for learners and employers alike. The Partnership has two primary purposes (as a charity and company limited by guarantee) which are to:

- maintain the quality and integrity of the Framework, and;
- build understanding and awareness of the Framework and its benefits amongst learners, employers and institutions.

Many of the recommendations of the Review clearly support these two purposes, and the implementation of those recommendations would take the Framework to the next level in terms of its universal use as the 'currency' through which learning and skills may be understood.

2. The SCQF as an asset

The Partnership has reflected on the recommendations and provided several suggestions on ways in which Ministers could support the enhanced use of the SCQF for its lifelong learning ambition within a reformed system. The relevant recommendations are indicated where appropriate.

Capacity building: building understanding of the SCQF and changing attitudes (rec. 2)

Our Schools Ambassadors programme was highlighted in both RSDL and the Review of Qualifications and Assessment as an exemplar of building understanding and bringing clarity to the Scottish learning and skills landscape, opening up a variety of learner pathways to young people and promoting parity of esteem between vocational and non-vocational attainment routes. A key part of this work has been to encourage schools to speak in the language of the SCQF, whilst respecting recognised products across schools, further and higher education, and there are undoubtedly opportunities for us to build on this activity in schools with relatively modest investment, such as expanding our capacity building activity into different settings.

October 2023

Raising awareness of the SCQF amongst pupils (from BGE Second level, P5-7 onwards), and their parents or carers would also fundamentally increase understanding of the breadth of learner pathways available and parity of esteem.

Whilst we already work with careers advisors and Developing the Young Workforce (DYW) in school, adult and community learning settings, there are significant opportunities to increase awareness and use of the SCQF at a national and more strategic level, thus providing more consistency in the promotion of learning pathways across learning and skills provision.

Parity of esteem (rec. 6)

We welcome the recommendations around enhancing parity of esteem through better use of the language of the SCQF. We also value the SCQF's role in enabling progression from one form of education to another e.g. articulation with credit from college to university and support the further development of pathways and understanding of SCQF Levels that enables learners to progress without unnecessary repetition of study at the same SCQF level.

The Partnership does not, however, support the proposal to over-simplify qualifications by eliminating any reference to the type of qualification (e.g. National 4, NPA, VQ or Degree) which describe the purposes and/or pedagogical approach taken.

Recognition of Prior Learning (RPL) (rec. 9)

The Partnership agrees that, were recognition of prior learning consistently embedded across education, training and employment, there would be significantly less repetition of learning, fairer access, and potentially savings for the public purse. The SCQF Partnership (SCQFP) is the owner of the principles for RPL which are used by HEIs and other organisations, and currently provides resources, tools and workshops to promote its use. RPL can be used to recognise skills for career development, more effective recruitment and skills utilisation and entry or articulation in formal learning.

Scottish Government is urged to provide leadership and direction on this area, by developing a national strategy for RPL, which aims to ensure fairer access, to post-school education and skills opportunities by embedding RPL practices as a condition of funding and advocating for consistent and fair articulation policies. Embedding such an approach follows many other European and international countries' example. We are very happy to support this work if required.

3. Publicly funded post-school qualifications (rec. 8 and Purpose & Principles Initial Priorities)

Oversight function

Scottish Ministers have already indicated through Purpose and Principles Initial Actions that oversight of publicly funded qualifications (except degrees) should be undertaken by the new qualifications body. There is a need for clarity on how 'oversight' is defined, in terms of the Framework's future role. The Partnership is part of a Short Life Working Group set up by the Scottish Government to consider these issues in more detail.

We are clear that there **is no current duplication** of functions between SQA Accreditation, QAA and the SCQFP. It is not the role of the SCQF, nor was it ever intended, that the Partnership should make judgements about which qualifications should be credit rated onto the Framework, or to design the Scottish school, College, University or Apprenticeship curriculum offer, nor assess the quality of qualification delivery and assessment. A whole-

October 2023

system overview of the functions that Ministers decide should support qualifications and standards will be essential, together with the respective crucial roles of stakeholders.

The SCQF Partnership's role has been to ensure that a consistent process, following the principles and criteria of the Framework (approved by our Board and Quality Committee) has been embedded into every credit rating bodies' quality assurance approach. We work with key sector quality agencies to ensure our functions do not overlap or duplicate their arrangements. The argument about whether or not publicly funded qualifications should be *regulated* or not is therefore not one on which the Board collectively has a view.

SCQFP promotes the development of wider range of learning pathways, but does not make a judgement that any one pathway is better than another. In terms of careers advice our responsibility is not to deliver that service, but rather to equip those tasked with delivery to understand the SCQF and promote progression or re-skilling routes made possible through the learning programmes on offer on the framework.

From the perspective of the SCQFP, there will need to be clarity on the position:

- of all existing CRBs' qualifications (except degrees) that could be classed as publicly-funded (if they attract public funding), post-school and subject to this oversight. This includes all Approved Credit Rating Bodies as well as Colleges.
- around other qualifications credit rated by HEIs in their role as CRBs, which are not degrees.
- Higher education qualifications awarded by colleges
- The steps needed to ensure that there is appropriate coherence between the regulation of qualifications and the awarding bodies providing them - and other oversight arrangements for colleges and universities.

As a Partnership, and from the perspective of the role of the SCQF, we would support all publicly funded qualifications being credit-rated onto the SCQF in order to support learner progression and recognition of achievement. There are currently challenges in oversight for both SQA Accreditation and the SCQFP functions, where qualifications used in Colleges (and by employers) are neither credit rated for the SCQF nor regulated by SQA Accreditation in Scotland.

However, where awards are not credit-rated for good reason (for example John Muir awards in which young adults with complex additional support needs can participate but are not formally assessed), they can still provide a clear value to individuals' life skills and experiences. Any reform needs to recognise and accommodate these award programmes in terms of public funding provision.

Colleges as crediting rating bodies

Currently SCQFP carries out quality assurance of College SCQF credit-rating activity on behalf of the Scottish Funding Council as well as training and capacity building in credit-rating processes. However, it has no role in quality assuring qualifications or assessment. The Partnership's role is to assure the competency of any credit rating body wishing to place qualifications onto the SCQF. This includes reviewing College's established quality assurance processes. This review work is designed to complement, rather than duplicate, the work carried out by Education Scotland with no duplication of effort. The SFC's Tertiary Quality Enhancement Project is being developed and delivered by QAA and will incorporate

October 2023

credit-rating activity. This makes sense, so long as there is appropriate involvement of the SCQFP in assuring that those arrangements for credit rating are consistent with its principles and criteria.

4. Areas for improvement

There are, of course, further improvements that could be made to current Partnership operation to increase the benefits to learners and employers are:

- Revision of the Board's current composition, extending its membership to include wider representation of education and skills agencies and interests including learner voice.
- Greater focus on consistency of RPL and articulation processes across institutions, building on success models already developed between colleges and universities
- A clearer understanding between the distinct role of SCQF Partnership and the qualifications regulator (currently SQA accreditation).
- Clearer 'shared confidence' processes between the QAA and SCQFP on the application of SCQF criteria and processes, and corrective action where issues are raised.
- Greater use of and investment in the SCQF database as a central resource which encompasses a wide range of types of qualifications, including smaller learning programmes such as micro-credentials developed by universities to aid learner choice.

5. Merging SCQF Partnership functions into new qualifications body (rec. 8)

Independence and coherence

The majority of the Partnership Board supports the co-ownership model of the Partnership and its independent nature set out in our governance arrangements; the current approach allows Directors from partner organisations to represent lifelong learning qualifications and learning programmes across institutions and employment sectors, adopting a devolved approach to quality assurance of credit rating bodies (not qualifications). The Framework is not 'owned' by any one sector, type of institution or body. This has worked well, in the main, and enables the Framework to encompass all interests in one lifelong learning infrastructure, whilst allowing different sectors/institutions to develop products that meet their particular stakeholders' needs.

The original purpose of the Partnership was to enable **all parts** of the education system to participate in one system for recognising achievement. Placing responsibility for the SCQF into any one public body would undoubtedly be difficult for the independent bodies (two of which are membership based) that are members of the Partnership, given their independent governance and accountability arrangements. They are not accountable to Scottish Government for their activity, unlike SQA

The majority of our Board do not support the merging of the Partnership in its current status into the new qualifications body, but understand the rationale of the current SQA for advocating that it is part of the regulation arm of the new qualifications body.

If a decision is taken to move responsibility for the SCQF into a larger public agency, the Partnership board could still exist as a separate entity in order to take decisions of benefit to all lifelong learning establishments and pathways, but with the staff function sitting within, for example, the regulatory arm of the new qualifications body. However, there could be governance challenges with a separate Partnership Board, as guardians of the Framework, sitting outside of the accountability structures for a new qualifications body.

Whether such an organisation should be answerable to Scottish Ministers (in the form of an arms-length body) is a separate issue which Government Ministers have previously strongly resisted. Should this be the preferred model for Ministers, the Partnership Board believe

October 2023

that the dual functions of the current organisation should be kept together rather than split between the qualifications agency and a reformed careers and education agency. Dividing operational functions of a small team into two separate organisations would inevitably create distance for development staff from the very product about which they are seeking to promote understanding.

Resourcing efficiencies

Withers supports the functions the SCQF Partnership provides and indicates that it should be strengthened as an enabler and underpinning element for a reformed landscape. The Partnership's delivery costs are currently less than £900k per year and there is certainly further scope to enhance learner pathways were further resources available.

The Partnership is already exploring shared accommodation and other shared services approaches with other member organisations in order to reduce its current overheads.

Conclusion

The SCQF was developed with the full support of the (then) Scottish Executive to truly represent 'lifelong learning' delivery and to provide a descriptive non-regulatory framework with learner centred aims. The Levels and Credit of the SCQF bring clarity for learner and employers and learner mobility internationally; it is only the 'machinery' of the quality assurance mechanisms that lie behind it that is, necessarily, complex. Its cohesive and voluntary approach to placing qualifications on the Framework has attracted international interest and commendation.

The Partnership's Board and Chief Executive would welcome further, constructive discussion on any elements of this paper and how we can support Scottish Ministers' priorities.

Annex A: Current Partnership governance and delivery

The appointed directors of the Board are the Chief Officers of: **College Development Network, Scottish Qualifications Authority, Universities Scotland, Quality Assurance Agency**, together with our independent Chair and two co-opted Directors, who are the Chair of the Quality Committee and represent employer interests (Scottish Training Federation).

Scottish Ministers are able to appoint a Director under the current Articles of Association, but in 2011 took the decision not to do so, due to conflict of interest considerations.

The Partnership exists as an independent, non-biased organisation in order to maintain a learner centred approach to Scottish lifelong education. It provides oversight of the national Framework which provides parity of pathways and recognition for a wide range of learning owned by a wide range of organisations.

Charitable objectives

The Partnership's charitable objectives detailed in the charity's Articles of Association are:

- to assist people of all ages and circumstances to access appropriate education and training over their lifetime to fulfil their personal social and economic potential, and;
- to enable employers, learners, and the public in general to understand the full range of Scottish qualifications, how they relate to each other, and how different types of qualifications can contribute to improving the skills of the workforce, through promoting and supporting the Scottish Credit & Qualifications Framework as a tool to support lifelong learning in Scotland.

Current Delivery

The SCQFP works with 250 learning providers (awarding bodies) to ensure their learning programmes are recognised.

These include SQA, colleges and universities but also private and public sector employers, charities and other organisations.

Some of these organisations wish to have their learning recognised on the SCQF for different reasons:

- Developing confidence in their sector/organisation.
- Gaining competitive advantage in terms of attracting a high calibre of staff.
- Gaining professional body recognition.
- Developing learning pathways for their staff/sectors, providing recognition of different learning programmes for young people that develop their transferable skills.

Annex B: List of Credit Rating Bodies

The Partnership currently works with around 54 Credit Rating Bodies (CRBs - organisations that have the authority to place qualifications onto the Framework). There are also numerous other publicly funded organisations with learning programmes on the Framework in the public and third sectors as well as private organisations that offer their qualifications in schools and colleges such as REHIS.

- Higher Education Institutions
 - Further Education Colleges
 - Scottish Qualifications Authority (SQA)
 - Chartered Institute of Bankers in Scotland
 - Scottish Police College - Tulliallan
 - City and Guilds*
 - ICAS (Institute of Chartered Accountants of Scotland)
 - Scottish Fire & Rescue Service - TED
 - Scottish Prison Service College
 - Opito (oil and gas sector)
 - ASET International Energy Training Academy
 - EduQual
- City and Guilds is in the 'run-out' process before qualifications will be removed from the SCQF (i.e. waiting for previously enrolled candidates to complete in Scotland).