

Education Bill Provisions Consultation

SNIPPEF response FINAL

Key points

- Establishment of a new qualifications body. The new qualifications body will have a governance structure involving representation and accountability to all learners, teachers, practitioners, and stakeholders.
- Collaboration for education reform between the Scottish Government, national bodies, and stakeholders to align policies with Scottish education's vision.
- Greater clarity in roles and responsibilities of national bodies and their relationships in the broader education and skills system.
- Independent inspection allows unbiased evaluation of education quality and national policy implementation.
- Curriculum for Excellence requires better stakeholder engagement and alignment with the assessment system.
- Teachers' role as key to delivering better outcomes for pupils and students.
- Regular reporting on Scottish education's overall performance by the inspectorate to inform policy and practice.

Question 1: What changes should we consider in terms of how qualifications are developed and delivered that you think would improve outcomes for Scotland's pupils and students?

SNIPPEF submission:

As the guardian of the Modern Apprenticeship in Plumbing and Heating in Scotland, SNIPEF suggests key changes for the Scottish Qualifications Authority to improve educational outcomes:

Enshrine industry alignment and collaboration: Collaborate closely with industry stakeholders to ensure qualifications remain relevant to their needs, incorporating emerging technologies, practices, and sustainability.

SNIPEF acknowledges that some of these aspects are already in place, but enshrining greater industry alignment would help ensure that qualifications remain fit for purpose and continue to serve their respective professions effectively. Collaboration is essential, and fostering strong partnerships between SQA, educational institutions, joint industry boards (where available), and industry stakeholders should be further encouraged to ensure a comprehensive learning experience.

Practical emphasis against academic learning: Prioritise hands-on training within qualifications to better prepare apprentices for real-world scenarios. We recognise that practical emphasis is already a part of apprenticeships. However, reinforcing this aspect

would benefit apprentices, especially in qualifications such as the Modern Apprenticeship in Plumbing and Heating.

Soft skills development: Enhance soft skills training to better prepare apprentice communication and business management. While some soft skills training already exists, reinforcing and formalising it within qualifications can further benefit apprentices. This is an issue often cited by employers.

Diversity and accessibility: Explore strategies to make apprenticeships accessible to a more diverse range of candidates. We acknowledge that efforts are being made, but ongoing commitment to inclusivity is crucial.

Improving continuous assessment and feedback mechanisms: Implementing regular and comprehensive on-site assessments beyond routine checklists is essential for effectively monitoring progress. This approach not only enhances overall outcomes but also facilitates the identification of issues and the development of precise, targeted solutions. Recognising the crucial role of these assessments in ensuring quality and value for money, it is imperative to secure adequate funding for their thorough, in-person execution. Relying solely on virtual systems like Teams is insufficient and should not be considered a viable alternative.

Finland's educational model showcases the advantages of such holistic evaluation. It goes beyond conventional examinations, fostering personal growth, self-awareness, and collaborative learning. Consequently, this approach leads to enhanced results and the creation of customised remedial strategies.

Question 2: How best can we ensure that the views of our teaching professionals are taken into account appropriately within the new qualifications body, and do these proposals enable this?

SNIPEF submission:

SNIPEF supports the enhanced representation and active engagement of teaching professionals in the decision-making processes of the new qualifications body. It is crucial to recognise their input as substantive and valuable rather than a mere formality. This involvement brings diverse perspectives and enriches the decision-making process. Maintaining transparency in operations and decisions is vital to building trust and ensuring accountability.

Moreover, there's a need for accessible feedback mechanisms, enabling teaching professionals to contribute effectively. Such mechanisms, including consultations, focus groups, and surveys, ensure educators significantly influence educational policies and practices. Drawing inspiration from Finland's education system, where teachers are integral to curriculum development and school governance, Scotland can value and utilise the substantial input of its teaching professionals.

In addition to the points already mentioned, we want to emphasise the crucial role that lecturers play in developing our qualifications in plumbing and heating. These professionals contribute significantly to the educational process and adhere to stringent requirements for continuous professional development (CPD) annually as part of the Plumbing and Heating Modern apprenticeship. This ensures that our lecturers are highly skilled in their field and

continually update their knowledge and teaching methods to provide the highest standard of education to our apprentices.

Incorporating these elements into the governance and decision-making structures, including Board Representation, a Dedicated Committee, and a user-friendly Charter, will position the qualifications body to deliver high-quality, relevant, and responsive qualifications that meet the needs of learners and the industry.

Question 3: How best can we ensure that the views of pupils, students and other learners are appropriately represented within the new qualifications body, and do these proposals enable this?

SNIPEF submission:

As the primary authority overseeing the Modern Apprenticeship in Plumbing and Heating in Scotland, SNIPEF is uniquely positioned to implement strong feedback mechanisms for apprentices. Leveraging our expansive network of Regional Training Officers, our strategic partnership with the industry trade board SNIJIB, and our direct relationships with employers, we have the means to directly gather feedback from apprentices.

Crucially, trade bodies like SNIPEF are integral in maintaining close connections within their professions, which is vital for gathering valuable insights from students and learners, particularly in apprenticeships. This enables us to collect precise and pertinent student feedback effectively.

In alignment with the proposals in the consultation document, SNIPEF acknowledges and supports the inclusion of Board Representation and the formation of a Dedicated Committee within the qualifications body. We believe that having board members representing the views of those studying for qualifications is crucial. This ensures that the perspectives and experiences inform the decision-making process of students and apprentices.

Furthermore, establishing a Dedicated Committee as part of the formal decision-making structure is a commendable step as it allows for integrating a wide array of viewpoints into the qualifications body.

Question 4: How can we ensure qualifications being offered in Scotland are reliable, of a high standard and fit for purpose?

Note: See end of document for info on German and Swiss VET systems

SNIPEF submission:

SNIPEF supports the proposal for a new qualifications body in Scotland, recognising its potential to enhance apprenticeship standards and reliability. This proposal aligns with our commitment to high-quality education, like Germany's Dual VET system, which integrates industry insights into education.

The separation of awarding and accreditation functions will strengthen the Scottish qualifications system's credibility, a key factor for stakeholder trust. This mirrors the successful practices in Switzerland's VET program and aligns with our goals for credible apprenticeship programs.

We agree with the new body's mandate to deliver diverse, high-quality qualifications crucial for the professional development of our apprentices and the industry's reputation. The

involvement of various stakeholders in decision-making, ensuring accountability and transparency, reflects our collaborative governance values. Similar to Singapore's SkillsFuture initiative, this approach will ensure the qualifications system meets industry needs.

To ensure the ongoing quality and relevance of our apprenticeship programs, you may wish to consider conducting longitudinal surveys of former apprentices 3, 4, and 5 years after they have completed their apprenticeship. These surveys would aim to evaluate the long-term value of the apprenticeship in terms of career development and job satisfaction. This feedback would be instrumental in assessing the real-world effectiveness of training programs and will provide critical insights for continuous improvement, ensuring that our apprenticeships remain responsive to the needs of the industry and beneficial for the career growth of our apprentices.

Finally, it's important to acknowledge that aspirations for high standards in education require corresponding financial support. High-quality education, including the development of comprehensive qualifications, cannot be sustained on limited budgets. Therefore, it is essential to ensure that funding aligns with our ambitions for maintaining and elevating educational standards, to provide the necessary resources for achieving these goals effectively.

Question 5: How do you think the qualifications body can best work with others across the education and skills system to deliver better outcomes for all?

SNIPEF submission:

SNIPEF endorses the consultation's call for enhanced collaboration between the Scottish Government, national bodies, and stakeholders, such as professional trade associations, joint industry boards and unions, to align the qualifications system with Scottish education's evolving vision.

The qualifications body's alignment with national education and skills strategies and collaboration with other organisations will be vital in influencing and integrating the education and skills system. Establishing an effective national forum, similar to the Advisory Council, will provide diverse insights and expertise, ensuring that the qualifications system meets industry and learner needs.

However, while SNIPEF supports the new body's commitment to involving various stakeholders in its decision-making process overall, emphasis must be on the need for a system that is accountable, transparent, and responsive to the diverse needs of the education system and industries, such as ours.

Question 6: Do you agree or disagree with the purposes set out? Is there anything in addition you would like to see included?

Note: The purposes are:

- Support for education providers: To aid schools, teachers, and other practitioners in improving through capacity building and sharing effective practices.

- Sharing evidence: To disseminate information about education and training to support services, improve them, and inform the development of education policy.

SNIPEF submission:

SNIPEF agrees with the purposes set out in the consultation document for the new qualifications body. We appreciate the focus on supporting education providers, including schools and practitioners, through capacity building and sharing effective practices. This approach is essential for improving the quality of education and training, particularly in vocational and technical professions like plumbing and heating.

Moreover, we agree with emphasising sharing evidence about education and training to inform policy development. This is crucial for ensuring that educational services are continuously refined and aligned with the evolving needs of both learners and industries.

However, we suggest an additional focus on specific industry engagement, particularly in vocational education sectors. Close collaboration between the qualifications body and industry representatives, like SNIPEF, can ensure that qualifications and training programs are directly relevant to the needs of the workforce and employers. This would include regular consultations with industry bodies and incorporating their feedback in developing and evaluating qualifications.

In this context, it is also essential to highlight the role of managing agents in supporting micro businesses within vocational training. Managing agents like SNIPEF Training Services are crucial for structuring apprenticeship programs that blend practical and theoretical learning. Their support enables micro businesses to effectively participate in vocational training, ensuring industry standards are met, and market needs are addressed, thus enriching the apprenticeship ecosystem.

Question 7: Do you agree or disagree with the range of establishments to be inspected by HM Inspectors of Education? Is there anything you would add or change?

Note: Establishments to be inspected include:

- Nursery, primary and secondary schools
- Community learning and development services
- Publicly and privately funded colleges
- Modern apprenticeship training
- Education functions of local authorities
- Career information, advice, and guidance services
- Initial teacher education

SNIPEF submission:

SNIPEF acknowledges the comprehensive range of establishments slated for inspection by HM Inspectors of Education and supports this inclusive approach. However, we believe the inspection framework should be expanded to include the vital functions of managing agents, which are crucial in bridging the gap between colleges and professions.

Regular inspections of managing agents are essential to ensure they serve the best interests of their professions. This involves assessing their delivery and service for professionalism and value for money to taxpayers. A key aspect of these inspections should be how effectively they manage the college curriculum portion of their profession, aligning it with industry needs and maintaining high educational standards.

By incorporating managing agents into the inspection framework, we can enhance the accountability and quality standards of these organisations within the education and training system. This inclusion levels the playing field in terms of service delivery and requirements for all managing agents, ensuring the effective fulfilment of their roles. This, in turn, actively promotes the advancement of professional standards and the development of a highly skilled workforce.

We would also like to address recent comments that have unfairly generalised managing agents. The range in the quality of services provided by managing agents is as varied as that in schools and hospitals. For instance, the Scottish plumbing profession broadly supports SNIPEF Training Services (STS), demonstrating the need to recognise the diversity in service quality among managing agents. Furthermore, according to our recent research, STS is widely recognised by the profession as the primary provider of apprenticeships in Scotland. This insight underscores the significant role of STS and its acceptance within the profession as an essential facilitator in vocational training. Acknowledging STS's pivotal position in our response highlights the industry's perception and the need for their continued involvement and recognition in shaping the future of apprenticeships in Scotland.

Such assessments must distinguish between agents, spotlighting those who excel in serving apprentices and students and ensuring that the needs of these end-users are always the priority.

Question 8: Do you have any specific comments on the role of the inspectorate of education in the inspection of publicly funded colleges, initial teacher education, early learning and childcare and /or modern apprenticeships?

SNIPEF submission:

SNIPEF strongly supports the current role of the education inspectorate, yet we believe there is a crucial need for a more detailed and sector-specific approach when inspecting modern apprenticeships. Such an approach would ensure that apprenticeship programs comply with general educational standards and are tailored to meet the specific requirements and evolving trends of individual sectors, like plumbing and heating.

This sector-specific inspection approach is aligned with global best practices in vocational education. For instance, the German Dual VET system, renowned for its effectiveness, employs a rigorous and sector-focused inspection regime. This ensures that apprentices gain relevant skills, enhancing their employability and contributing to a skilled workforce that meets the economy's needs.

Similarly, in Switzerland, a country with a robust vocational education system, apprenticeships are closely aligned with industry requirements. The Swiss system ensures that the training is up-to-date with the latest industry standards and technologies, a practice regularly monitored through sector-specific inspections. By adopting a similar approach,

Scotland can ensure that its modern apprenticeships remain relevant and responsive to the specific needs of each sector.

Detailed inspections should assess the quality of training and how well these programs prepare apprentices for the demands of their chosen careers. This includes evaluating the curriculum's alignment with current industry practices, the effectiveness of the training in imparting necessary skills, and the overall readiness of apprentices to enter the workforce.

Finally, and again, SNIPEF advocates for the inspectorate's role to be extended to evaluating the effectiveness of managing agents in bridging the gap between vocational education and industry demands. This will help ensure that apprenticeships remain relevant, up-to-date, and responsive to the evolving needs of the workforce.

Question 9: Do you agree or disagree with the priorities set out? Is there anything in addition that you would like to see inspection cover?

Note: Priorities are:

- Ensuring that children, young people, adult learners, parents/carers, teachers, other practitioners, and the public have confidence in the work of the inspectorate of education.
- Ensuring the involvement of teachers, other practitioners, children, pupils, students, parents/carers, local authorities, and providers in the inspection process.
- Ensuring that inspection evidence is fully utilised to provide assurance and public accountability, drive improvement and build capacity, and inform practice and policy.

SNIPEF submission:

SNIPEF agrees with the priorities of the education inspectorate as they align with our principles of high-quality training and accountability in the modern apprenticeship system. We mainly support the focus on building confidence in the inspectorate's work among all stakeholders, including learners and industry professionals. This confidence is crucial for maintaining the credibility of the education and training system.

We also endorse the priority of involving stakeholders in the inspection process. For the modern apprenticeship sector, industry representatives must be included in these inspections to ensure that the training aligns with current and future industry needs. This will help ensure that apprentices are equipped with relevant skills in demand in the workforce.

Furthermore, effectively utilising inspection evidence to drive improvement and inform policy is essential. We propose that this should focus on the evolving requirements of various industries, like plumbing and heating, to ensure that vocational training remains relevant and responsive.

In addition to these priorities, SNIPEF would like to see a specific emphasis on continuously reviewing and adapting apprenticeship curriculums to keep pace with technological advancements and changing industry practices. This will help ensure that apprenticeships remain a robust pathway to skilled employment in Scotland.

Question 10: Do you have a view on these options for establishing the new approach to inspection?

Note: Options are

- Creating a Separate Executive Agency: This option involves removing the inspection function from Education Scotland to establish a distinct and separate executive agency.
- The second option is to legislate the role of 'HM Chief Inspector of Education for Scotland' as an independent office-holder.

SNIPEF submission:

SNIPEF is open to either option as our priority is that the new approach to inspection robustly addresses the specific needs and nuances of different sectors, including the technical and vocational training sectors crucial to Scotland's economy.

While we see potential advantages in both approaches, we emphasise the need for any new inspection framework to include a detailed and sector-specific approach, especially for modern apprenticeships. This ensures that the training provided aligns with the current and future needs of the industry, enhancing the quality and relevance of apprenticeship programs.

Additionally, it's important to consider the limitations of the current inspection methods, such as those employed by SQA External Verifiers (EV). Currently, SQA EVs can only vet and inspect work within a centre that has been started or completed. They cannot review work not created or presented during an EV visit. This limitation should be addressed in the new inspection framework to ensure that SQA qualifications are being taught within the intended timescales and to the expected standards. This aspect is critical for maintaining the integrity and effectiveness of the qualification process, particularly in sectors where technical skills and practical training are paramount.

Question 11: Do you have a view on how governance arrangements for the inspectorate could be developed to better involve providers, including teachers and other practitioners, pupils and students and parents / carers in inspection?

Note: Options are

- Creating a user-focused Advisory Council enabling the voices of those involved in inspections, such as teachers, practitioners, pupils, students, and parents/carers, to be heard and considered.
- Legislate the creation of an Advisory Council by the Chief Inspector who would be an independent office-holder.
- Legislative duty for the Chief Inspector to heed the advice of the Advisory Council.

SNIPEF submission:

SNIPEF supports establishing a user-focused advisory council, whether through current arrangements or legislative action. This council would play a crucial role in ensuring that the voices of those directly involved in and affected by the education and training system, including apprentices and vocational training providers, are heard and considered in the inspection process.

Such an advisory council should ideally include representatives from various vocational sectors, including plumbing and heating, to address these sectors' specific needs and challenges. This will help tailor the inspection process better to assess the quality and relevance of vocational training programs.

Question 12: Do you have a view on how we make sure evidence from inspections is being used as fully as possible to drive improvement and inform policy and on who the inspectorate should report to?

SNIPEF submission:

SNIPEF supports the proposed approach for the inspectorate to report on the overall performance of Scottish education. This reporting would provide valuable insights for all stakeholders, including vocational education providers like us. Additionally, legislating the reporting requirements for the Chief Inspector can ensure consistency and accountability. Annual reports on the inspectorate's functions and the broader performance of Scottish education would enhance public trust and provide a clear benchmark for educational standards and improvements.

We also advocate for the publication of individual inspection reports. This transparency is crucial for sectors such as modern apprenticeships, where specific insights into the quality of training can guide improvements and policy decisions. These reports should detail how well apprenticeship programs meet industry standards and prepare apprentices for their careers.

Furthermore, SNIPEF proposes that the SQA publish a league table relating to inspections for each SQA centre. This could be a significant driver for improvement, as centres or qualifications would likely strive to avoid being at the bottom of the ranking. Such a league table would encourage healthy competition among centres and help highlight areas needing improvement, ultimately raising the overall standard of education and training provided.

German and Swiss VET systems

The German and Swiss Vocational Education and Training (VET) systems are highly regarded and have influenced vocational education models worldwide. Their success lies in the strong collaboration between the educational system, industry, and government, ensuring that training remains relevant to the needs of the modern workforce.

German VET System

1. **Dual System:** The cornerstone of the German VET system is the dual system, which combines practical training in a company with theoretical education in a vocational school. Apprentices usually spend 3-4 days a week in the company and 1-2 days in vocational school.

- 2. Wide Range of Occupations:** The German VET system covers various occupations, from traditional crafts to modern services and high-tech professions.
- 3. Regulation and Standards:** The system is highly regulated to ensure quality. The Federal Government, Länder (states), and professional organisations collaborate to set standards for training programs.
- 4. Apprenticeship Contracts:** Apprentices sign contracts with companies, ensuring they receive training and a salary.
- 5. Pathways to Higher Education:** While VET is often seen as a path distinct from academic education, it can also lead to higher education, including universities of applied sciences.

Swiss VET System

- 1. Dual Education Focus:** Unlike Germany, the Swiss system is also based on the dual education model. However, the Swiss system often includes a more significant portion of on-the-job training.
- 2. Public-Private Partnerships:** Swiss VET heavily involves private companies, industry organisations, and the federal and cantonal governments. This collaboration ensures that the training is closely aligned with labour market needs.
- 3. Variety of Educational Pathways:** Swiss VET offers a range of pathways, including full-time vocational schooling and more academically oriented programs that lead to a Federal Vocational Baccalaureate, which opens doors to higher education.
- 4. High Social Status:** Vocational training in Switzerland enjoys a high social status and is considered a viable and respected career path.
- 5. Flexibility and Permeability:** The Swiss system is known for its flexibility and the permeability between vocational and academic tracks.

Key Differences

Flexibility and Permeability: Switzerland's system is generally more flexible and allows easier transitions between vocational and academic tracks than Germany's.

Role of Companies: In Switzerland, companies play a more significant role in defining and providing training, whereas in Germany, the government and professional bodies have a more robust regulatory role.

Educational Pathways: The Swiss system provides more varied educational pathways, including options for higher education directly through the VET system.

Why better?

- Both Germany and Switzerland emphasise a dual system combining practical and theoretical training, closely integrating industry needs. In contrast, Scotland's system has traditionally been more academically oriented, with less emphasis on practical, in-company training.
- German and Swiss systems involve significant collaboration with industry, ensuring training aligns with labour market needs. Scotland is moving towards greater industry collaboration but historically has had less direct industry involvement in shaping vocational training.

- Germany and Switzerland offer diverse and flexible pathways, covering various occupations and clear paths to higher education. Scotland's VET system, while diverse, has traditionally provided less flexibility for transitioning between vocational and academic tracks.
- The German and Swiss systems are highly regulated, maintaining high-quality standards and enjoying high social status. Scotland's VET system is also regulated but has faced challenges in achieving similar levels of esteem and recognition.

Finland's holistic evaluation education model

- Finland's approach to education focuses on understanding each student as an individual with unique strengths and areas for improvement. Instead of relying solely on standardised testing, they emphasise a holistic understanding of a student's progress, allowing educators to tailor instruction to individual needs.
- Unlike systems that heavily rely on high-stakes exams, Finland's holistic approach reduces student stress and pressure. There are fewer standardised tests and less emphasis on competitive grading, allowing students to focus on a more well-rounded education.
- The Finnish model strongly emphasises developing critical thinking skills, problem-solving abilities, and collaboration among students. These skills are essential for success in the real world, going beyond repetitive memorisation.
- Instead of relying solely on one final exam, Finland employs continuous assessment methods, including teacher assessments, project-based learning, and peer evaluations. This ongoing evaluation provides a more comprehensive view of a student's progress.
- Finland's approach aims to instil a love of learning and intrinsic motivation in students. By focusing on personalised learning and a well-rounded curriculum, students are more likely to stay engaged and motivated throughout their educational journey.
- Finnish teachers are highly trained and trusted to make educational decisions based on their expertise. This trust in educators' professional judgment contributes to the success of the holistic model.
- Finland's approach has successfully reduced achievement gaps between students from different socio-economic backgrounds. This is attributed to the equitable distribution of resources and a focus on supporting struggling students.
- Finnish schools prioritise student well-being and happiness. Students are given more freedom to choose their subjects and have shorter school days, allowing them to maintain a healthy work-life balance.