



# The Church of Scotland

---

## Church and Society Council

The Church of Scotland  
Church and Society Council  
121 George Street  
Edinburgh, EH2 4YN

T: 0131 225 5722

E: [churchandsociety@cofscotland.org.uk](mailto:churchandsociety@cofscotland.org.uk)

Charity Number: SCO11353

## **Empowering Schools: A consultation on the provisions of the Education (Scotland) Bill**

**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?**

While the Headteachers' Charter, as described in the consultation document, might lay out the new areas over which head teachers will have authority, de facto empowerment will depend on the level of resources available. For head teachers to be fully empowered they need to be able to implement the decisions they might wish to take around curricula, collaboration and improvement plans etc. While the Charter might pass responsibility for taking decisions on to head teachers, such implementation is dependent on aspects such as the time and capacity of the head teacher, there being sufficient staffing (teaching and non-teaching), there being sufficient school infrastructure such as enhanced ICT services, sufficient finance for teaching resources, and sufficient support for quality improvement. Without these resources, any provisions made in the head teachers charter would achieve very little in terms of empowerment.

Furthermore, while the consultation document does make reference to a number of checks and balances, greater detail would be needed to clarify the extent of the envisaged powers to head teachers.

**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?**

While the involvement of the school community in developing the school improvement plan is a welcome approach, we would not recognise this as new but as an example of best practice. In general this approach is dependent on the head teacher, the school staff and the wider school community having sufficient time to engage with such procedures. Currently a lack of non-contact time is a severe restriction on this ideal. If sufficient time for proper engagement is not made



available through enhanced human resources then full and proper collaboration will be very difficult with a significant risk of tokenism.

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

The Church of Scotland is supportive of the principle of subsidiarity whereby nothing should be done by a larger and more complex organisation at a higher level, which can be done as effectively by a smaller and simpler organisation at a more local level. The primacy of the school improvement plan rooted in the local context and the experience of the expertise of the school community then is very valuable. Nonetheless, there will be requirements for the exchange of ideas, accountability and coherence within the wider regional and national frameworks. While the proposals within the consultation appear to take this into account conceptually, as with our previous answer, the practicalities of this process will require sufficient resources in terms of time, money and staff.

### **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?**

It is only right that the head teacher, with the most immediate oversight of the day to day performance of the school, should be as fully engaged in staffing as is practicable. Nonetheless, in practice this would require strong working links between the local authority, as the employing agency, and the head teacher for this to be successful. Were this not the case there would be significant possibilities for problems to arise.

#### **b. What are the advantages and disadvantages of headteachers' ability to choose their team and decide on the promoted post structure within their schools?**

As per our previous answer, it is essential that head teachers, given their role, should have the ability to choose their team and decide on the promoted post structure within their school. The Consultation document appears to suggest that responsibility for setting the overall budget for schools will lie with the local authority. Were this the case greater clarity would be required as to the relationship between the head teacher's perception of the staffing needs of the school and the budgetary provision of the local authority. More importantly greater clarity is required regarding the levels of discretionary expenditure for each party.



### **5. Should headteachers be able to decide how the funding allocated to their schools for the delivery of school education is spent?**

Yes  No  Don't know

If so, what is the best way of doing this?

Greater delegation of finance has to be accompanied by sufficient administrative support. If this is not the case there is a risk that the increased administrative burden will negate any extra creative capacity that this move might allow. Decisions about the level of funding allocated to schools, while the subject of another consultation, will have a significant bearing on whether in practice this change has a positive effect on individual schools.

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

Within the current system, spending decisions are taken by elected councillors and other representatives on local authority committees responsible for education. These decisions follow overall budgetary decisions that are taken by the council taking into account a number of factors including the allocation made by national government. This process is long and difficult often including consultation exercises with local people.

For head teachers and school communities to have meaningful involvement in this process would require a reimagining of the process which is largely determined by the national and democratic process. The Church of Scotland is actively involved in equipping communities to use participatory models of budgeting as a way of fostering community cohesion and transparency. We believe such models would be worthy of consideration in this instance, increasing the level of transparency and community involvement. Equally any budgetary decisions would need to have sufficient time frames so as to allow for stability and progress.

### **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?**

This question is best answered by the head teachers themselves; nonetheless it goes without saying that sufficient time would need to be freed for head teachers to undertake training and sufficient support staff required to ensure additional workload can be properly managed. In recent years budget cuts have led to a reduced support service for head teachers and teachers. It remains to be seen whether the new Regional Collaborative approach will have the additional budget to create the supports required by schools.



### 8. Are the broad areas for reform to the Scottish Schools (Parental Involvement) Act 2006 correct?

Yes  No  Don't know

Please explain your answer.

Previous efforts to engage parents in the management of schools have not proved to be fruitful. By contrast, we feel that the primary focus should be upon the engagement of parents in supporting learning. If done well, this shift in focus from the institution of the school to the learning and development of the child. Such involvement is best implemented early on through early years' initiatives and primary schools by providing targeted support and the appointment of home-school link staff. This will require additional resources to support parents and a realisation that education is not restricted to the classroom but is "life wide" and that schooling is only part but an important part of the process.

### 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?

Emphasis on parental involvement should be focussed, first and foremost, upon the support for their own child's learning journey rather than involvement in the management of schools-improvement planning, school policy and curricula design. While steps may be taken to engage parents in such decisions the first step must be to support parents to engage with their children's education rather than the school. Examples of this include simple activities such as paired reading initiatives, involving parents in homework clubs etc.

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

Yes  No  Don't know

Please explain your answer.

Supporting parental involvement in the development and learning of their child should be a priority. However it should be acknowledged that parental involvement in early years and childcare establishments are only a small part of this engagement. Where there is limited resources greater emphasis should be put on supporting parents to engage with their child's development rather than their child's nursery specifically (for example).



**11. Should the Bill include a requirement that all schools in Scotland pursue the principles of pupil participation set out in Chapter 3?**

Yes  No  Don't know

**Should this be included in the Headteachers' Charter?**

Yes  No  Don't know

Please explain your answer.

As highlighted within the consultation, pupil participation has a positive impact on the pupils concerned as well as the institutions in which they participate. However, in practice, pupil engagement with the management of the school only accounts for a very small number of pupils, many of whom are already active and engaged within the life of the school. If the primary concern is to raise standards and to narrow the attainment gap, energy may be better focussed on building a more open relationship at a classroom level between the teacher and the pupil. By enabling pupils to feel empowered to participate at this level there is a greater likelihood of changing the culture within schools and ensuring the greatest number of students see the greatest possible benefit.

**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...?**

The principle that schools should ensure that their pupils are engaged in the life of the schools is vital. That schools should have freedom to decide the best form this should take, depending on their particular context and the needs of their pupils, fits comfortably with the principal of subsidiarity which the Church is generally supportive of. Nonetheless, it would be helpful if there were principals outlining the nature of that participation. One such principle would be that participation involves the vast majority of pupils, not merely a few representatives and enables them to shape their learning and their learning environment. In particular, significant efforts should be made to ensure that pupils who are disenfranchised from the education system are able to contribute in this way. Such duties would require training to support teachers to properly engage all pupils in the team approach to their learning.



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

Yes  No  Don't know

Please explain your answer.

Collaboration between local authorities to ensure the best possible education for pupils is to be encouraged. However, structural change without a corresponding change in resources is unlikely to work and could produce a system that draws attention and resources away from the grassroots. In recent years QIS teams and other support services have been drastically cut resulting in reduced staff capacity at a regional level for challenge and support. While collaboration is to be encouraged it should be acknowledged that the ability to collaborate itself requires resources.

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

Yes  No  Don't know

Please explain your answer.

Yes or at least every 3 years.

**15. If we require Regional Improvement Collaboratives to report on their achievements (replacing individual local authority reports), should they be required to report annually?**

Yes  No  Don't know

**Would less frequent reporting (e.g. every two years) be a more practical and effective approach?**

Yes  No  Don't know

Please explain your answer.

We believe that the greatest time and energy should be spent focusing on delivery at a grassroots level. While regional improvement plans are an important part of this we feel that annual reports would prove too cumbersome and time consuming. While monitoring improvements is vital we would recommend this be no more frequent than a report every 2-3 years.



The Church of Scotland

Church and Society Council

**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  No  Don't know

Please explain your answer.

As per our answer to question 15, we believe that the greatest time and energy should be spent focusing on delivery at a grassroots level.

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

Yes  No  Don't know

Please explain your answer.

While the aims listed are admirable, we have significant reservations about this proposal. The GTCS is a well-established body, and, in recent years has a sound track record, having moved into encouraging teacher's self-reflection, target setting and continuous professional development. While there may be a need for professionals within the field of education who are not teachers to be part of a similar body our concern would be that a single Education Workforce Council for Scotland would be unwieldy and reduce rather than enhance existing provision for the teaching workforce.

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

None

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

Yes  No  Don't know

Please explain your answer.

While the proposed functions are appropriate for the suggested purpose of the EWC, we remain concerned that carrying out these functions for such a broad community of practitioners would prove too cumbersome a task.



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

None.

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

All of those listed.

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

Yes  No  Don't know

Please explain your answer.

Were an Education Workforce Council to come into being it would be appropriate to consult on fees with particular consideration given to the relatively low pay of many of those professions listed.

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

Given our concerns about the size and manageability of an Education Workforce Council as described in the consultation, we would recommend that at least two bodies are required to ensure sufficient involvement of sufficient numbers of co-professionals. Consideration could be given to how these bodies might work closely while retaining distinct identities.

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

Having already stated a preference for at least two bodies, we might suggest retaining GTCS as a separate body for teachers, with the proposed EWCS only for those professionals who are not teachers.