Education reform: Education Scotland and the

Scottish Qualifications Authority

November 2021

SQA consultation response

SQA

Contents

Overview

This response provides the views of staff at the Scottish Qualifications Authority (SQA) on the future shape of Scotland's national education agencies, in response to the Muir Review consultation. In so doing, it highlights the ongoing importance and coherence of SQA's current functions and statutory responsibilities — and the need for continued safe and secure delivery of a broad range of qualifications to schools, colleges, training providers, whilst planning for a new future.

The key elements of SQA's response are:

♦ There should be a new national body with responsibility for an integrated and coherent approach to curriculum, assessment, qualifications and accreditation.

♦ The new body should be responsible for all aspects of the qualifications portfolio, which should be given an equal platform in a reformed organisation. This includes:

— both academic and vocational qualifications, accompanied by work to ensure that a wider range of vocational qualifications are available in every school and to build parity of esteem between academic and vocational qualifications.

— qualifications offered outside Scotland, to maintain the highly-regarded global reputation of Scottish education, and to support the Scottish Government's internationalisation agenda.

♦ Accreditation and regulatory functions should be part of the new body's remit, with appropriate governance to ensure the separation of responsibilities are clear and protected.

♦ All qualifications, including those contained within Apprenticeships in Scotland, should be accredited, regulated and included on the Scottish Credit and Qualifications Framework (SCQF).

♦ The new body should play a key role in supporting the teaching profession in curriculum development, assessment, quality assurance and national standards.

♦ Proactive, positive and meaningful engagement with stakeholders should be part of the DNA of a new national body and learners must be at the heart of a more collaborative approach to decision-making.

♦ Reform provides an opportunity to be bold in driving forward digital assessment and to rethink how technology provides end to end support.

The OECD Review highlighted that there is a case for a new curriculum, assessment and qualifications body to be established. SQA agrees that there is a case to be considered. However, we do not believe that the creation of this new body will deliver change and improvement on its own. Structural reform needs to be considered alongside important issues of capacity and culture, together with greater clarity on roles and responsibilities across the whole education system, nationally, regionally and locally. At the same time, the creation of a new body itself must be fully considered, developed, and implemented whilst minimising operational and delivery risks to the current education system, including the current role of SQA in delivering qualifications.

The awarding, accreditation and regulation of qualifications needs to remain at arm's length from government but needs to work closely with the education and training system and the learners it serves, to ensure it meets the needs of learners, the labour market and the economy. Regulated qualifications provide learners and stakeholders with a guarantee of the quality standards of the learning architecture in Scotland, and there is a strong case for regulation to move from a voluntary system to a more formalised one for all publicly funded qualifications offered in Scotland by a range of awarding bodies.

The creation of a new curriculum, assessment and qualifications body could provide the catalyst to refine and improve the approach to assessment, develop more sustainable and efficient products and services, and contribute to learner-centric and more effective and pandemic-proof delivery methods. However, this will require additional investment and support from across the education system.

This is also a potential catalyst for cultural change in Scotland: creating a trusted, reliable and stable operating model of high quality, delivering consistent and credible qualifications, working towards achieving parity of esteem between academic and vocational pathways, and providing learners with choice and the opportunity to personalise their assessment journey to best meet their needs. A new curriculum, assessment and qualifications body could create an opportunity to collectively take responsibility for change, developing new skills and capabilities for the future to improve the outcomes for Scotland's young people and lifelong learners.

1 Curriculum for Excellence

Key points

♦ Curriculum for Excellence is the right approach for Scottish education but, over time, and following the removal of unit assessments, assessment in the senior phase has become misaligned with it. The four capacities of Curriculum for Excellence should be retained and developed further to equip learners with the skills to transition into college, university or work.

♦ There should be increased integration between academic and vocational qualifications in our schools to help learners achieve a more rounded learning experience in the senior phase and further demonstrate both skills and knowledge. There should be a better balance between teacher assessment — supported by the use of digital technology and more teacher non-contact time — and external assessment.

1.1 Does the vision for Curriculum for Excellence reflect what matters for the education of children and young people in Scotland?

We believe that the vision of Curriculum for Excellence (CfE) is the right approach for Scotland. This was the first time that Scotland carried out a root and branch redesign of its 3–18 curriculum, assessment, and qualifications system. Curriculum for Excellence places learners at the heart of the education system and reflects the way we as a nation think that we need to develop our young people centred around four capacities: successful learners; confident individuals; responsible citizens; and effective contributors.

It is worth a recap of how the CfE was implemented. Considerable care was taken to put in place the Curriculum for Excellence policy documents that underpin the design of the 3–18 curriculum, assessment, and the qualifications. There were four key CfE policy documents that drove the approach 3–18, including qualifications and their assessment and quality assurance:

♦ *CfE Building the Curriculum 1: the contribution of curriculum areas*. This introduced the curricular areas and their contributions to the four capacities. Contributions to the four capacities were built into the curriculum outcomes within the Broad General Education (BGE) and into the courses for use in the senior phase.
♦ *CfE Building the Curriculum 3 — a framework for learning and teaching: key ideas and priorities*
♦ *CfE Building the Curriculum 4 — skills for learning, life and work*
♦ *CfE Building the Curriculum 5 — a framework for assessment*

The original design of the qualifications and assessment was determined by the CfE Management Board and agreed by Scottish Ministers. A decision was taken by the Management Board to develop subject-specific qualifications, aligned to

the curriculum areas but with a focus on development of the four capacities. SQA worked with Education Scotland to ensure good progression from curriculum areas into qualifications and to ensure progression from curriculum level 4 (the final stage of Broad General Education) into the qualifications.

The design of the qualifications followed these principles for curriculum design:

♦ **breadth** — drawing on knowledge and skills from across the course
♦ **challenge** — requiring greater depth or extension of knowledge and/or skills
♦ **application** — requiring application of knowledge and/or skills in practical or theoretical contexts as appropriate

Each course incorporates **skills for learning, skills for life** and **skills for work** (literacy, numeracy, Health and wellbeing, employability, enterprise, and citizenship and thinking skills). *Building the Curriculum 4* gives a more detailed skills framework to help people with this. SQA incorporated these skills into all courses as appropriate.

The courses were designed for ongoing unit assessment up to and including SCQF level 4. National 4 included an added value unit (AVU) assessment which was also internally assessed and quality assured. The aims of the AVU assessment were not to assess additional content, but to provide the opportunity for learners to demonstrate additional challenge and application in the subject context. Courses up to and including National 4 are ungraded.

National 5, Higher and Advanced Higher (SCQF levels 5–7) were all assessed using a combined strategy of unit assessment, coursework, and exam, as appropriate to the learning outcomes of each course. The use of coursework saw a very significant increase under CfE — with most courses having coursework.

Coursework takes a variety of forms — project, investigation, performance, folios of work, and practical work. Course assessment was designed to assess the added value of the course, assessing learners' ability to use and apply their knowledge and skills. Units were assessed on a pass/fail basis, and the course assessment was graded. Unit assessment aimed to build on and support positive formative assessment practice. The design of the assessment aligned with CfE *Building the Curriculum 5 — a framework for assessment*. As the CfE Management Board and Ministers were agreeing the design, there was a debate about whether or not National 5 should use a similar assessment strategy to National 4 to assess the added value of the course. However, a collective decision was taken to align the assessment strategy of National 5 with Higher and Advanced Higher.

SQA developed and published National 3, 4 and 5 simultaneously; then Higher; then Advanced Higher.

The approach to quality assurance for unit assessment and internally assessed coursework was also aligned to *Building the Curriculum 5* — it was an adapted version of the approach to teacher moderation used in Queensland. Each local authority and college nominated specialists for each subject. These people were

trained by SQA and then took part in the national quality assurance of centre assessments. The intent was that that they would also be used locally and regionally to support teacher judgement.

The model of using nominees within each local authority was enshrined in a partnership agreement between SQA and each local authority. The agreement set out what local authorities and schools could expect of SQA and vice versa.

What were some of the factors that impacted on implementation?

Some of the factors that impacted on implementation were:

♦ National 4 and National 5 were often delivered and assessed in bi-level classes (class groups combined). In some cases, the different assessment design of the two levels impacted on bi-level delivery and assessment. There were also some examples of tri-level delivery and assessment. The practical challenges related particularly to the review of learners' progress and to difficulties in moving between levels once delivery had commenced. On reflection, using the same assessment approach for National 4 and National 5 may have helped in the implementation and with some of the practicalities.

♦ Local and regional resourcing was being squeezed at the time of implementation, so there was less local and regional resource to support capacity building, particularly in relation to curriculum design and delivery, and the use of formative assessment to support unit assessment.

♦ The local nominee model for quality assurance was being used variably across the country to support local and regional quality assurance — therefore the level of support for teachers was patchy. SQA provided some national support, but local and regional support for teachers is required alongside this, in curriculum-making and assessment, and quality assurance.

♦ This was taking place in a paper era when the education system did not have the technology to support quality assurance — for example uploading digital candidate assessment evidence for regional and national quality assurance. The ability to upload digital evidence reduces bureaucracy and workload, but the infrastructure needs to be there to run this locally, regionally, and nationally.

♦ Design of assessment was meant to happen locally, but SQA was asked for more and more support as teachers worked through implementation. SQA developed lots of assessments that teachers could use. However, this did not align with the original intention of CfE. Some of these assessments narrowed teaching and learning rather than supporting the intended formative role of unit assessment. To address this, in future we would need to build appropriate capacity in the system, supported by appropriate CPD and non-contact time for practitioners.

♦ Time given to delivery of courses — courses were designed to be delivered in 160 hours. Many learners were getting considerably less than this, and so the

breadth and depth of delivery of the subject — and delivery of the skills for learning, life and work — was constrained. This was evidenced in the [NQ Research Fieldwork](#) visits that SQA carried out across every local authority area in Scotland, speaking to S5/6 learners, teachers, and senior management teams about their experiences of the design, assessment and implementation of the new National Qualifications.

♦ Schools continued to deliver one-year courses and perpetuate the 'two-term dash' to Higher and Advanced Higher. The policy intent was for two-year courses or exit qualifications, but this did not materialise to any scale, and so we now have three cycles of two-term dashes to National 5, Higher and Advanced Higher. The consequence of this approach is that there is insufficient time for the breadth and depth of learning that was a key policy aim of Curriculum for Excellence. This can impact on the delivery of each course as there is insufficient time available to provide a sufficiently broad and deep learning experience. It can also narrow the curriculum choices of individual learners.

♦ The development of the Insight Benchmarking Tool for the Senior Phase provided a broader set of measures than STACs (Standard Tables and Charts), and this was welcome. However, there is more work to do to ensure that the right incentive systems are in place to support effective curriculum models, focusing on measures beyond the volume of qualifications. CfE gave centres permission to diversify curriculum pathways and, whilst there is evidence of progress (for example, Education Scotland's Creative Learning initiative), there is still more work to do here.

♦ There was a deliberate decision by the education system not to develop national learning and teaching approaches or support, and to empower teachers locally and regionally to develop their own. However, this has arguably resulted in inconsistent provision. SQA has provided support for assessment, and provides basic learning and teaching guidance in the support notes for each course. We have also provided, on occasion, more detailed learning and teaching support, especially when introducing something new. Examples include: Awards in Mental Health, Computing courses, ESOL courses, Statistics awards, Higher Applications of Mathematics. Sometimes we have done this ourselves, and at other times have brokered others to do it. A new curriculum, assessment and qualifications body, with the right resources, could provide some level of national support to complement regional and local work. There also needs to be more support at a local and regional level to build capacity for curriculum-making.

♦ In the vocational area, some schools have cited, along with timetabling, lack of support for learning and teaching as one of the barriers to introducing new vocational qualifications. Regional DYW (Developing the Young Workforce) work has helped to progress this diversification of the curriculum. Rigorous evaluation of this work, understanding the drivers of school, college and learner choice, is needed so we can continue to scale diversification of the curriculum to meet young people's needs for different learning experiences

that motivate them and help prepare them for their next steps in learning and their futures. There are areas where we have successfully worked with partners to provide support and resources — an example of this would be our work with the SFA to develop and introduce Personal Development Awards (PDAs) in Football Refereeing, which are widely used in schools. There is a role for the new curriculum, assessment and qualifications body to support local curriculum design.

In 2016, Scottish Ministers made the decision to remove unit assessments and to move to an assessment approach using coursework and exams. This led to a misalignment between CfE and assessment. This decision was taken because of concerns about teachers' and learners' workloads. SQA was asked to make these changes very quickly.

As Scotland embarks on a further round of reforms, we need to consider carefully issues of implementation, including the capacity of the system to implement change effectively. A new organisation will play a key role here working with local and regional partners.

What do we think should be retained?

Many of the policy intentions as set out in the *Building the Curriculum* series are still relevant today, and arguably for the future too. The four capacities of successful learners, confident individuals, responsible citizens, and effective contributors within CfE should be retained and developed further to equip learners with the skills they need on leaving school education and to transition into the workplace or tertiary education. The CfE skills for learning, life and work were built into each National Course.

To some extent, the way schools construct local curriculums to ensure that learners still continue to develop the four capacities during the senior phase is key, as there is a wide range of National Courses, Awards and vocational qualifications available for them to use to enable continued learner development. There should be increased integration between general and vocational qualifications to help demonstrate the application of skills and knowledge, and there is a debate to be had on whether skills or knowledge are more important to society — and on how far we should embed these core transferable skills, interdisciplinary learning, and meta-competences, whilst recognising that this would require additional and adequate resourcing.

As the national body for the curriculum 3–18, there would be an opportunity to develop interdisciplinary learning (IDL) opportunities which would benefit from national support and moderation. This would, hopefully, lead to greater confidence in (and uptake of) senior phase IDL qualifications (some of which are already available but more could be further developed, building on the BGE experience).

The current National Courses use a combination of coursework assessment and examinations. Arguably the removal of units and unit assessment took away a strong element of teacher assessment. The appropriate balance is needed between teacher and external assessment, with a full consideration of the practicalities involved. In addition, other flexible assessment approaches would help realise the vision of CfE but also acknowledge the value of external assessment. Ongoing continuous internal assessment of learners, alongside a move towards online and digital assessments, could help to embed teacher-led assessment, linked to the outcomes of CfE. There also needs to be an emphasis on local and regional curriculum-making as well, and an opportunity for Regional Improvement Collaboratives to play an even stronger role.

To realign the courses with *Building the Curriculum 5*, there should be a better balance between teacher assessment and external assessment. In designing the new assessments, we should consider how we can use assessment to drive teaching and learning and better alignment with the overall curriculum aims. Moving to a more continuous assessment model would also give teachers greater autonomy in the type and rollout of assessments. However, we cannot forget the concern raised by the teaching profession about the impact this had on their workload in 2020–21 — and also in 2014–16, before unit assessment was removed. In deciding on the most appropriate approach to the design of the assessment system, the balance between validity, reliability, credibility and practicability is key.

What should be changed?

From a curriculum perspective, the qualifications align well with the CfE *Building the Curriculum* policy documents 1, 3 and 4. In their original design, they better aligned with *Building the Curriculum 5*, but the government's decision in 2016 to remove units and their assessment took the courses out of line with the CfE policy intent. Although the curriculum of the courses aligns with the CfE policy intent, assessment does not and could be redesigned. Teaching pedagogy would have to change alongside curriculum and assessment to enable personalisation and choice and adaptive assessment.

Any change should involve stakeholders and a wider engagement with education, business and industry to promote the learning of skills and practical knowledge. If there were to be an in-depth review of the eight curriculum areas, this could be widened to include life skills that could be carried forward on leaving school — such as promoting the ethos and community element of the curriculum, promoting positive behaviour in school and the local community — whilst also increasing opportunities for decision making and putting values into practice.

Core transferable skills, interdisciplinary learning, and meta-competences are essential elements of CfE, intended to develop competent and confident learners. Skills for learning, life and work are built into the courses, so the question now is about how to enhance the embedding of these skills and competences further into the senior phase — with ongoing learning and teaching, assessments and critical reflection — in such a way that the learner is central to their own learning experience, developing a level of autonomy.

Research is currently underway in SQA, involving subject experts mapping the curriculum across specifications and assessment materials and actual learner evidence, to give some additional detailed and evidenced insight into the extent to which NQs are aligned to CfE, and where any sources of misalignment lie. This should be helpful to the next stage of reform.

Adequate resourcing is a vital element if we are to deliver the changes needed to deliver the vision. Policy and funding should always align to provide consistent and sufficient funding for the national agencies, in teacher training, schools, colleges and local authorities. We believe that this should cover new technology, a push to online learning and assessments, whilst also ensuring there is enough staff and time to deliver quality teaching and assessment. We believe that practitioners need sufficient support and resources to provide a-rounded learning experience. If more teacher assessment is used, then it is essential to increase the non-contact time for teachers to accommodate this and give them a manageable workload. The new curriculum, assessment and qualifications body will have a key role to play here, working with the education system to build capacity to ensure smooth implementation.

2 Curriculum and assessment

Key points

♦ A new national curriculum, assessment and qualifications body, responsible for both academic and vocational qualifications, would enable a coherent approach to delivery of learning and teaching, assessment and qualifications across the learner journey, from 3–18 and beyond.

♦ The new body should also have responsibility for ongoing review of the curriculum, assessment approaches, and qualifications design and review.

♦ More should be done to ensure that a wider range of vocational qualifications are available in every school to provide all learners with the right opportunities to meet their aspirations.

A new national body should provide direction and support for local collaboration between schools to broaden the availability of qualifications, including vocational opportunities such as work-based learning, Foundation Apprenticeships, Skills for Work Courses and National Progression Awards. Reform provides an opportunity to be bold in driving forward digital assessment and to rethink how technology provides end-to-end support, but this requires leadership, resource and expertise.

2.1 Does the Curriculum for Excellence provide a coherent progression in the journey of learners (3–18) that gives them the best possible educational experience?

The 3–18 curriculum, assessment and qualifications system was built to enable smooth progression in learning 3–18. As highlighted above, the policy was put in place and is detailed in the *Building the Curriculum* (BtC) policy documents. The 3–15 curriculum was designed first, and the qualifications were designed after that to give a smooth progression from the broad general education into the senior phase. The current courses have been designed to give good progression in learning from the relevant curriculum outcomes from the BGE.

The pace of learning within the BGE and the senior phase needs to be addressed to support smooth progression through learning. Many schools are still doing a new set of courses each year of the senior phase. The original policy intent was for more time for breadth, depth and application of learning, with a move to exit qualifications or doing courses over two years. This would be aided by smoother transitions, supported by more effective alignment between curriculum and assessment from 3–18.

2.2 In practice, learning communities are empowered and use the autonomy provided by Curriculum for Excellence to design a curriculum that meets the needs of all of their learners

As part of their learner journey, all young people are entitled to experience a coherent curriculum from 3–18, so that they have opportunities to develop the knowledge, skills and attributes they need to adapt, think critically and flourish as they leave school and progress onto their next steps in life, education and work. As young people move into the senior phase, they need to be provided with opportunities to study qualifications and other planned experiences to continue their development of the four capacities, and to prepare them to move into positive sustained destinations beyond school.

As a national public sector awarding body SQA currently provides a comprehensive range of qualifications — National Qualifications, and a wide range of vocational qualifications and broader achievement Awards, such as Customised Awards — to meet learners' wide-ranging needs to help prepare them for their next steps in life. SQA's current vocational provision also covers a wide range of vocational sectors to support the economy of Scotland. The teams that are responsible for national and vocational qualifications work together to build learning pathways for learners at different stages on their lifelong learning journey. For example, SQA is currently carrying out a review of National Courses in PE alongside a review of the Fitness and Sport vocational provision as one programme to ensure that we build a set of qualifications with coherent pathways for learners.

Learners have different aspirations and are also motivated by different types of learning. To meet different learner needs, schools have been working with partners to diversify their curriculum and meet the aspirations of as many of their learners as possible. There has been great progress in this area, but there is still work to do to ensure that these opportunities are available in every school in Scotland.

Work-based learning, Foundation Apprenticeships, Skills for Work Courses and National Progression Awards can all be used to broaden the learning opportunities available in our schools. With sufficient funding and staffing levels, local authorities could support hubs so that schools can work collaboratively to achieve this. The new body could provide national direction and support. We should ensure that learners have a broad skillset that enables them to progress with their chosen pathway.

One of the policy drivers that looks to collaborate between the vocational and school sectors is the Developing the Young Workforce (DYW) strategy. DYW is the Scottish Government's Youth Employment strategy, which aims to better prepare young people for the world of work through the variety of qualifications available to help them realise their potential and achieve their ambitions. Work with the DYW regional groups should continue so that we understand the range of needs across Scotland.

The design of the vocational qualifications — with the focus on skill and knowledge development, assessment, and generating evidence in different ways — aligns with the findings of the OECD review and provides exciting opportunities to explore how the approaches used in vocational qualification structure and development could be applied to National Qualifications.

Local, regional and national support is required to support teachers in curriculum-making, assessment and quality assurance. To address this, we would need to focus on ongoing professional learning for practitioners, and ensure they have sufficient non-contact time.

Although it was recognised that there are issues of resource, size, and geography, schools need to offer more vocational options for learners.

2.3 The creation of a curriculum and assessment agency will help to address the misalignment of curriculum and assessment as outlined in the OECD report

Consideration of bringing curriculum, assessment and qualifications together under one organisation was a recommendation of the OECD report and formed the basis for Ministers announcing the replacement of SQA. It is important that this recommendation is taken forward.

There is a logic to bringing together the functions of curriculum, assessment and qualifications body into one body, covering the 3–18 curriculum and beyond for both national and vocational qualifications. This would enable a clear and coherent approach to national policy, planning and delivery and review of the curriculum, learning and teaching practice and assessment across the education and skills system 3–18. This organisation would also have a role in working with RICs, local authorities and schools, colleges and training providers in supporting curriculum-making, learning and teaching and assessment at the national, regional and local levels, working with partners.

Building on the work of SQA, a new national body should also play a crucial role in ensuring that the provision of skills, training and education in Scotland is effective and meets the needs of individuals and employers by providing credible, rigorous and consistent qualifications that will help learners to progress in education and employment. It could also support businesses by ensuring that those who have obtained their qualifications have met rigorous standards and competences, whilst providing the assurances that are needed for employing or promoting staff.

SQA works across the education and skills system, providing qualifications and assessment to meet a broad range of needs across national and vocational qualifications. All qualifications are SCQF credit rated and levelled, and are designed to create learning pathways to meet the needs of learners at different stages of their life and career. It would be critical to maintain these diverse curriculum pathways in the establishment of any new organisation.

SQA currently provides the majority of the mandatory qualifications that make up Foundation and Modern Apprenticeships in Scotland. Following the principles set out in *Building the Curriculum 3 — a framework for learning and teaching; key ideas and priorities*, the senior phase should include opportunities to study a range of qualifications, including work-based learning qualifications. The creation of a curriculum, assessment and qualifications body will, on its own, not address the wider educational system issues in Scotland. Conditions for success are dependent on a shift in culture and the national education system working together towards a common goal. The replacement of SQA alone will not achieve the recommendations made in the OECD report, but the transition must be supported by existing systems.

The new curriculum, assessment and qualifications body must ensure that it remains responsive to new and emerging needs in the Scottish economy for both mainstream education and workforce development and continuities, so that it can lead in the development of new qualifications to meet those needs. The development of a skilled workforce is accomplished through the availability of a qualification framework, and this is crucial to continued economic growth.

One of the key functions of a new curriculum, assessment and qualifications body would be to strengthen quality assurance and enhancement systems, in partnership with local authorities, regional partners and close working with the tertiary sector and to build the capacity of teachers to design, deliver and assess the curriculum and qualifications.

The scale of this change is significant. However, this is a unique opportunity to better serve learners and the teaching profession more effectively.

2.4 The full breadth of existing SQA qualifications play an important part of the curriculum offered by secondary schools

Scotland's academic and vocational qualification provision provides learners in Scotland and beyond with an extensive and flexible range of learning opportunities and pathways. They are not only extremely valuable qualification products but are also opportunities to learn from each approach and develop qualifications that will further support learners across Scotland. By developing a range of different qualification product types, the new curriculum, assessment and qualifications body can continue to work towards achieving parity of esteem between academic and vocational pathways, and provide learners with choice and the opportunity to personalise their learning and assessment journey to best meet their needs. The education system as a whole must come together to address and overcome the barriers to schools diversifying their curriculum to achieve this cultural shift — which must also be embraced by learners and parents/carers.

SQA's work on the design of new National Courses began formally in 2005 with the implementation of its 'National Courses for the Future' project in response to the publication of *A Curriculum for Excellence* (Scottish Executive, 2004).

SQA had already begun work to support the goals of the revised curriculum with the design and development of Skills for Work (SfW) courses. SfW courses also contributed to the government's broader educational policy and lifelong learning agendas, with SfW positioned as a contributor to Learning for Life, one of the then five National Priorities in Education.

The typical delivery model of SfW promoted partnership working between schools, colleges, business and training providers. The use of experiential learning within SfW helped learners understand the workplace and prepare for the transition from school to adulthood and the world of work. Positioning SfW within the National Courses portfolio helped promote parity of esteem between vocational and academic provision.

Skills for Work courses continue to be a well-used qualification across various subject areas and sectors. This work should continue, and a review of this qualification, alongside the Foundation Apprenticeships, would help shape the portfolio of qualifications to meet the needs of future learners.

SQA provides a full range of national and vocational qualifications, including Customised Awards, to support education, training and employers, and can offer learners with a choice of pathways. Organisations such as Career Ready, Scottish Business in the Community, Project Scotland, Volunteer Scotland and Inspiring 500 can ensure that the qualifications we develop cover all learners needs, and that there is flexibility in their structure to allow learning to be delivered in a way that best suits the needs of the learner. Apprenticeship schemes for young people, and opportunities for work experience and collaborating with Who Cares? Scotland, ensure that we look to develop qualifications that are accessible to all learners and offer opportunities to all.

Scotland is in a position to further integrate the qualifications offer and to raise the status of vocational qualifications. However, this would require cultural change across the education system and society more broadly. There is a need to work with schools and their communities to change the mindsets about the value of all learning.

Relationship with SCQF

The SCQF is the national qualifications framework for Scotland. It brings together all sectors of education, training, and skills — schools, colleges, universities and workplaces. It has been, and continues to be, a significant factor in the success and renown of Scotland's education and qualification system. All school, college and university qualifications are on the SCQF, and expertise is required in allocating credit and level to qualifications that are developed by employers.

SQA is a founding member of the SCQF Partnership and is represented on the Partnership Board. SQA, as a credit rating body, can credit rate its own learning provision, and SQA is approved by the SCQF to credit rate learning for other organisations. This is referred to as 'Third Party credit rating'.

The SCQF framework is an extremely valuable tool that helps to illustrate the different stages of learning that need to be joined up so that pathways and progression are clear, but it is not a mark of quality. It gives employers a way of assessing applicants' and staff knowledge levels and understanding, not just within their local area, region, or country but beyond national borders. It also allows the variety of training and qualifications on offer to individuals to be easily compared, but it does not determine the quality of the curriculum, assessment or qualification. In creating a stronger regulatory function within a new body, there is a case for more convergence between the SCQF and accreditation and regulation. This could include, potentially, some wider reforms to ensure that qualifications on the framework have also been through other measures to ensure their quality, validity and reliability (please see section 4.2).

2.5 Technologies are fully and appropriately utilised as a support for curriculum and assessments

To meet our aspirations as a digital nation, we need to frame our digital ambition in a much broader context than the replacement of SQA and a reformed Education Scotland. A national sector-wide approach would be the bolder ambition and more aligned to the national strategy. A greater use of technology and adaptive approaches would make assessment more targeted and reduce bureaucracy and costs. It could also make assessment processes more efficient and transparent. However, for us to embed a truly learner-centric approach to learning and assessment, there must be the infrastructure for digital coherence and alignment at all levels locally, regionally, and nationally. These will need to be appropriately resourced to support capacity and capability across the wider system.

Technology might allow for continuous formative and summative internal assessment in the classroom, with some summative assessments completed virtually. Remote invigilation would be a positive but costly step, and adaptive approaches would make assessment more individual to the learner, reducing the reliance on paper-based systems. This would support a more sustainable and efficient use of resources but would require significant investment at all levels of the system, alongside a joined-up approach to address the fact that there is, currently, no consistent IT landscape.

The pandemic highlighted some of the challenges the sector faces. It was clear that different organisations were operating in different ways with different technologies. A digital approach would have to be available and accessible to all learners, regardless of geography and circumstances, to ensure equal opportunities to engage in learning and assessment. Having an available and accessible digital approach for all learners removes other barriers that reduce access to education, including disability, illness, and school closures. Digitising components of the learning and assessment process has the potential to deliver real and substantial cost and efficiency benefits in some elements of the system, but it could result in either the same experience, or a poorer one, for learners and centres.

Leadership, resource and expertise are needed to drive the digital agenda forward into action. The scale of this undertaking should not be underestimated, but technology offers an opportunity to rethink the whole system end to end, rather than just transferring current methods over to a digital setting, for example, digital assessment should not just be about replicating like for like, it should be an opportunity to rethink the whole approach to assessment design and delivery. Efficiencies can be created, reducing paper-based methods by moving to a digital agenda, where all parts of the system embrace cultural change and collaborate to realise the benefits of our digital ambition.

Technology can enhance learning and enable more flexibility in the way assessments are suitable to the needs of learners, such as building portfolios which could be then used as practical evidence of learning to prospective employers and HEIs, whilst also capturing the wider range of learner capacities. Ongoing continuous, internal assessment of learners and a move towards online and digital assessments would allow for a more inclusive delivery of assessments and would be beneficial. However, teacher workload remains a key concern.

We can continue to investigate different technologies in support of models of assessment, marking and delivery that can impact positively on learners' engagement and provide improved opportunities for them to demonstrate their knowledge and skills. We do this by learning from and with other partners, and by looking more broadly across the UK and internationally — some of SQA's international centres are at the forefront of online delivery, assessment and certification, with systems and processes that are innovative.

We believe there are enormous opportunities ahead and, given the current focus on the education sector, this seems like the ideal time to explore these. Based on the National Digital Strategy, the question is how bold the sector wants to be and what are the key outcomes. Technology is only one component. Cultural change, leadership style, user focus, and collaboration are just as important to meeting our collective digital ambition.

3 Roles and responsibilities in Scotland's education system

Key points

♦ There needs to be greater clarity of roles and responsibilities and system-level collaboration, both nationally and locally, including clarity on the role of government in curriculum, assessment and qualifications.

♦ A new national body should play a key role in supporting the teaching profession across the curriculum, assessment, quality assurance and national standards, but this needs to be properly resourced at national and local levels.

♦ Proactive, positive and meaningful engagement with stakeholders should be part of the DNA of a new national body, and learners must be at the heart of a more collaborative and rights-based approach to decision-making.

3.1 Clarity on where the responsibilities for the strategic direction, review and updates for Curriculum for Excellence lie

Accountability for CfE has long been problematic: there has never been a clear description of what the system should look like, with clear roles and responsibilities. There has also been, at times, a perception of a diffusion of responsibility.

Being clear on the roles and responsibilities across education at local, regional and national levels would ensure a more consistent and reliable shared understanding of the functions and accountability of national agencies. This must also include clarity on the role of the Scottish Government in setting policy. Clear operational independence from government in curriculum development and review, assessment, and qualifications delivery, is required for a new body to plan, develop and deliver effectively — and truly serve the needs of the education system.

For engagement and collaboration to be successful, we must have clearly outlined local, regional and national organisation roles for any redesign of the curriculum, assessment or qualifications to aid successful implementation.

3.2 Clarity on the roles played by national agencies and other providers for responding to needs for support with curriculum and assessment issues

The education system made a deliberate decision not to develop national learning and teaching approaches or support mechanisms but instead to

empower teachers locally and regionally to develop their own. However, as highlighted above, this has resulted in mixed provision. Opportunities and support for practitioners can be patchy and, while local authorities offer general training, specific training is lacking in availability, and this can be unequal, with some practitioners finding it difficult to be released from other commitments to attend.

There is therefore a bigger role for national agencies to play in professional learning, curriculum support and assessment process. Training and support should be given to ensure practitioners feel equipped with a good understanding of assessment and national standards. Quality assurance and enhancement systems could also be strengthened, in partnership with local authorities and close working with the tertiary sector.

SQA provided support for assessment and some learning and teaching support notes for each National Course. Other agencies such as Scholar, SSERC, e-Sgoil have also provided learning and teaching support. The new organisation, working with local and regional partners, could have a key role in supporting capacity-building.

Investment in the system is required to ensure that the teaching profession is supported with effective training in assessment and quality assurance methods. It will not make the difference Scotland requires without clarity of responsibility and investment in the infrastructure across the education system.

3.3 Clarity on where high-quality support for leadership and professional learning can be accessed to support practitioners

We believe that a national approach to professional learning journeys for practitioners and those who work in centres — by encouraging and promoting continuing professional learning — is beneficial to improving learner outcomes. This must be embedded into centres and teaching practice, supported and encouraged by the leadership teams. There is a key role for the new national organisation to support capacity-building here, as long as it is appropriately resourced.

A number of online resources are available for practitioners, supporting professional learning and leadership via Glow. The General Teaching Council for Scotland (GTCS) also plays a large role in this provision and the development of professional standards. However, a new curriculum, assessment and qualifications body, if resourced adequately, could enhance levels of national support to complement regional and local work. This would be an opportunity to offer more support to the teaching profession by providing a national and collegiate approach to professional learning — not only through materials and resources on delivery of curriculum and assessment, but also offering more CPD opportunities linked to clear career pathways. The new body would be able to promote national standards for teachers and the key principles of effective learning, whilst also encouraging collaborative working across the sector by sharing best practice and exemplar learning materials.

All of this would be dependent on practitioners having time dedicated to completing their annual review and development plans to progress and develop their careers. This is also related to practitioners being empowered and trusted to contribute to a self-improving system.

Digital technology would also help in the creation of professional portfolios for teachers. This would enable the transfer of information from one centre to the next in the form of an online tool for professional development planning and evidence gathering, and one that follows the professional learner journey.

3.4 Trust with all stakeholders, including children, young people, parents and carers, so they are genuinely involved in decision making

Proactive, positive and continuous engagement with stakeholders will be critical to the success of the new curriculum, assessment and qualifications body, and to delivery of change and improvement across the education system. Trust, respect and credibility — built on meaningful, two-way relationships — will enable the collaborative development and implementation of products and services that meet the needs of customers and embed the United Nations Convention on the Rights of the Child (UNCRC).

Learners must be at the heart of this collaborative approach to engagement and decision-making. They have a right to have their voices clearly heard and to be active participants in decisions, not passive recipients of them. In October 2020, SQA established a Learner Panel to strengthen learner engagement. The Panel meets monthly and is run by the Scottish Youth Parliament (SYP) on behalf of SQA. It is made up of S3–S6 and college learners who consult with and gather feedback from across their own networks. The Panel was refreshed and strengthened at the start of the 2021–22 academic year as part of a new learner engagement strategy that promotes the importance and benefits of engagement across the organisation and identifies opportunities for co-creation.

The new body should build on this work to ensure learners' views play a clear and strong role in every aspect of curriculum and assessment design and delivery. There is also an opportunity to work with the Scottish Government and other public bodies to join up disparate learner engagement activities to ensure a more coherent and powerful approach.

This model of deep engagement should provide the blueprint for collaboration with all stakeholders and customers; one that is part of the DNA of the new curriculum and assessment body. High-quality, rights-based engagement and co-creation will make for better decisions and greater consensus and rebuild the trust that has been lost over recent years.

4 Replacing the Scottish Qualifications Authority and reforming Education Scotland

Key points

♦ There should be a new national body with responsibility for an integrated and coherent approach to curriculum, assessment, qualifications and accreditation.

♦ The new body should be responsible for all aspects of the qualifications portfolio, which should be given an equal platform in a reformed organisation. This includes:

— both academic and vocational qualifications, accompanied by work to ensure that a wider range of vocational qualifications are available in every school and to build parity of esteem between academic and vocational qualifications.

— qualifications offered outside Scotland to maintain the highly regarded global reputation of Scottish education, and to support the Scottish Government's internationalisation agenda.

♦ Regulation and accreditation functions should be part of the new body, with appropriate governance to ensure the separation of responsibilities are clear and protected.

♦ The new body requires independence from government to properly fulfil awarding and regulatory functions.

♦ All qualifications, including those contained within Apprenticeships, should be accredited, regulated and included on the Scottish Credit and Qualifications Framework (SCQF).

♦ There are key risks associated with simultaneously taking forward organisational change and the review of national qualifications, alongside continued delivery for learners, that need to be considered and managed.

4.1 Reform of Education Scotland

Independent inspection has an important role to play in scrutiny and evaluation, enhancing improvement and building capacity. Inspection should continue to be supportive and encouraging in nature and should report on good practice and inform improvements while having the learners' best interests at heart. It is important that an independent inspection body works with the new curriculum, assessment and qualifications body to help inform curriculum development and enhancement.

The inspection process should be independent of government, but with clarity on the relationship with government. Other models of independent inspection exist in Scotland and offer appropriate models of governance.

The existing wider functions of Education Scotland include curriculum support to practitioners, schools and local authorities through a variety of methods, including support to regional improvement collaboratives. SQA also provides subject support for practitioners. We believe curriculum support should move to the new curriculum, assessment and qualifications body to aid alignment. Greater clarity on the roles and responsibilities of the national bodies, supported by a strong culture of collaboration, will be key moving forward.

4.2   Replacing SQA: awarding and accreditation

SQA has two main roles under the Education (Scotland) Act 1996: awarding and accrediting qualifications. We have set out in the preceding sections that there should be a new national body with responsibility for an integrated and coherent approach to curriculum, assessment and qualifications, which includes the awarding of national and vocational qualifications in Scotland.

Under the Education (Scotland) Act 1996, SQA Accreditation currently has a statutory remit to independently accredit and quality assure qualifications and regulate approved awarding bodies, thereby safeguarding the interests of learners, employers, parents and carers, funding bodies, government and end-users of services.

Accreditation and regulation is a discrete function. It is one of the most important of the elements that support valid, reliable, credible qualifications and promote national standards in education. Qualification routes and progression pathways depend on accreditation and awarding functions working together across the full offer of qualifications in Scotland.

We strongly believe that the accreditation and regulation function should remain within a new curriculum, assessment and qualifications body, with appropriate governance to ensure the separation of responsibilities are clear and protected. Any test for setting up a separate regulatory body should be that the value added and the positive impacts clearly outweigh increased regulatory burden and all costs associated. While we do think there is a very strong case for further investment in accreditation and regulatory functions in Scotland — helping to provide a qualifications market that drives forward a lifelong learning agenda, enriching individuals' perspectives and opportunities, helping support a thriving economy, and furthering Scotland's economic strategy — we propose this would be most efficient through a strengthened function as an entity *within* the overall new organisation.

We propose that there is a strengthened function in self-regulation around National Qualifications (where there is not a qualifications market), as well as an augmented role for vocational qualifications (where there is a qualifications market). Features of stronger self-regulation for NQ would involve greater

emphasis on codes of practice, monitoring, a system of checks and balances, and critically, greater transparency and independence from government around these.

We think it would also be important to have mechanisms in place around greater capacity for policy, research, evidence, data analysis, horizon-scanning, forward thinking and thought leadership, to help prioritise and bring about important innovations mentioned elsewhere, such as digital implementation. In relation to an augmented role for vocational qualifications, we note that Scotland is at odds with the rest of the UK, where there is a clear link between regulation and public funding. In the rest of the UK, a secondary consideration of qualifications regulation is to protect the public purse by ensuring that only quality qualifications that meet the needs of a range of stakeholders attract public funding.

The Education (Scotland) Act 1996 states that SQA can accredit qualifications, providing that the qualifications meet such requirements as are specified by it. Essentially, this is voluntary regulation. Other bodies such as the Scottish Government, the Security Industry Authority, etc, have mandated that certain qualifications must be accredited and regulated by SQA Accreditation. Consideration needs to be given to the future role of accreditation and regulation by ensuring that any subsequent legislation strengthens the need for qualification regulation in Scotland.

We believe this could also incorporate the functions of the SCQF partnership into the regulatory function, with appropriate devolved authority for credit rating available to the university sector. This would help ensure further coherence and promote public confidence in all qualifications in the Scottish education system.

In the context of regulation there needs to be clarity on the roles and responsibilities of the regulator, Skills Development Scotland (SDS) and awarding bodies in relation to the development and quality assurance of the mandatory qualifications that make up Foundation and Modern Apprenticeships. SDS has ambitious plans to introduce new Foundation and Modern Apprenticeships. In taking this forward there needs to be clear roles and responsibilities for the regulatory function, for SDS and for awarding bodies. To make best use of public money, all of the public bodies need to work in genuine partnership, respecting each other's roles, to provide standards, qualifications and Apprenticeship frameworks within an appropriate regulatory framework for the qualifications that make these up and for the awarding bodies that offer them. Currently, Modern Apprenticeships can include qualifications that are not on the SCQF. We recommend that all qualifications in Modern Apprenticeships, including those in the enhancement sections, must be accredited and regulated by the regulatory body, and included on the SCQF.

SQA Accreditation also quality assures the development of, and gives final product approval for, National Occupational Standards (NOS). It is the only organisation that carries this function out, and it does so on behalf of the devolved administrations, which fund the Standards and Frameworks programme. This role will need to carry forward into the new organisation.

We judge there to be significant risks and downsides in setting up a separate organisational regulator, given the specialisation and expertise involved in both regulatory and assessment, and the qualification knowledge required, coupled with a need to be ready and fully formed, with a mature regulatory outlook from inception. The pool of such expertise is not large in Scotland, and separation could risk depletion from other parts of the system — such as the awarding body. If the cost of the apparatus of a new regulator were to be minimised through joining with another regulatory or inspectorate body, it would also risk diluting the mission, remit and expertise required.

There are also risks involved in changing the regulatory and accrediting landscape. A more complex regulatory landscape, where new awarding bodies do not seek accreditation, or where existing awarding bodies surrender their accreditation could lead to concerns about public safety should these unregulated qualifications continue to be offered by these organisations in Scotland. This presents a range of financial risks (costs of uncertainty, costs of transition and loss of income).

The new organisation must support all aspects of the qualifications portfolio, which should be given an equal platform in a reformed organisation and must maintain a highly regarded global reputation to ensure we support the Scottish Government's internationalisation agenda. The Scottish Government's Economic Strategy has internationalisation as one of its four key pillars for building a stronger, fairer and more prosperous Scotland.

More recently the Scottish Funding Council's (SFC) review of tertiary education brings together an assessment of international reach and activity that underpins the success of the sector. The Scottish Government is also developing a new International Education Strategy for Scotland, which aims to promote Scotland's education offer globally.

Continuation of the Next Generation Operating Model would also place the new body in a good position to scale up its operations to respond to opportunities offered in commercial markets, offering substantial financial investments for Scotland.

Transition and risks

Any transition needs to be robustly planned, managed and appropriately resourced (with people, finance, systems) to ensure the continuity of effective delivery whilst the transition and embedding of functions within the new body takes place.

Since the replacement of SQA was announced in June, given uncertainty regarding the continuity of SQA's existing functions, a number of strategic risks have been identified and need to be managed. These relate to our people (staff morale, and recruitment and retention — the recent decision by the Cabinet Secretary for Education and Skills to honour the present terms and conditions of employment for existing SQA staff has helped considerably in this regard); reputational damage; and the potential impacts on the credibility of SQA

qualifications and therefore Scotland's qualifications system, and the continuity of functions and impact on learners and customers.

An added layer of risk during any transition period, which now also includes the early stages review of National Qualifications, is the underlying requirement to continue to deliver safe and secure certification of Awarding in 2022 and beyond to fixed timelines (noting the requirement to plan for an exam diet and contingency arrangements in parallel), as well as meeting the requirements of customers in relation to HNVQ and our other services. There is a risk around resourcing the new curriculum, assessment and qualifications body, particularly in light of the lack of awareness of the scale of SQA's functions and the immense resource allocation required to create a new body. Being open and transparent in all communication from the outset, and offering clarity, would assist in achieving the aims of creating a new body and mitigate risks.

An added layer of complexity that needs full consideration is the introduction of new IT systems to replace legacy operational systems — and how this additional layer of change can be resourced and implemented on top of the transition from existing organisations to the new body, and over what timeframes this will be possible, respecting the need for continued delivery.

It is important that the new body has the authority and autonomy to make decisions, particularly at an operational level. Most importantly, timely and effective communication and engagement with staff and customers are crucial. The new organisation, including any potential suppliers such as those who supply the Management Information Systems (MIS) that support centres, must have appropriate lead-in times to ensure that staff and centres know what is required in good time to respond to any changes in systems and processes demanded by new functions or qualifications. It is important that lessons are learned from previous transformational change arising from mergers and the introduction of new qualifications. There must be continuity of service and no disruption to learner destinations into employment, training, and further and higher education. Consideration also needs to be given to the stakeholders that SQA Accreditation has a relationship with and also with regards to those organisations which have mandated it to accredit qualifications. It is also important to note that SQA will continue to be subject to data protection and freedom of information legislation, and records management requirements, whilst the transition of function to a new body takes place. Information may need to be destroyed, archived or transferred to the new body, and we must ensure that during all points in the reform process, it is clear who owns information, and who is responsible for any ongoing data protection or freedom of information enquiries and for keeping track of sensitive data to meet data protection obligations.

The current financial model which underpins SQA's activities is also in need of review — had the organisation not been subject to replacement, a range of issues relating to fees and charges would have been subject to review. Fees and charges have remained static since 2010 and bear no relation to the costs of service provision. SQA's current pricing structures are complex and in need of review and simplification. The levy placed on local authorities for National Qualifications has remained unchanged for 10 years, and both the quantum and

distribution of that levy (or another charging mechanism) are in need of review. In 2012 the Scottish Government established a strategic objective for SQA to become self-financing. Whilst cost reductions and additional commercial income were achieved, the prospect of a self-financing model was never realised, in part because of the demands placed on the organisation in relation to new developments associated with Curriculum for Excellence and the Review of National Qualifications (RNQ) which required additional grant-in-aid.

In addition, a historic under-investment in business, operating and IT systems has led to a number of risks associated with legacy systems that will need to be replaced, and those transformation programmes will need to be appropriately resourced.

The preparation for and transition from existing organisations to a new organisation, whilst maintaining service provision, will generate additional costs in the short to medium term. There will be direct costs in terms of the staff required to oversee and deliver such a transition, and opportunity costs given the need to focus on the transition rather than on pre-planned transformational activity. Against this backdrop, early consideration and decisions will be required as to the duration, resourcing and authority for both shadow arrangements in advance of the establishment of the new body and the residuary arrangements that will be required to address the winding up of SQA's affairs.

Ongoing monitoring of risks will be imperative (such as loss of information as staff leave, loss of assets and lack of clarity about duties as staff numbers reduce) and there must be appropriate cost-effective plans to mitigate them.

Allied to the risk profile of transition and SQA's ability to attract and retain staff, particularly in key specialisms such as IT, there is likely to be an increased dependency on temporary and contractor resource which in current market conditions will attract a premium.

The costs of uncertainty also needs to be considered. SQA's ability to attract and maintain commercial relationships is impacted in a number of ways. For SQA as a service provider, uncertainty is already impacting on our ability to seek new commercial opportunities either as a direct provider or as a partner with other providers. As a procurer of goods and services, we are having to consider our procurement options with regard to the extension of existing contracts or the potential for shorter-term arrangements that would offer poorer value for money than longer term stable commercial relationships. Early clarity on the continuation of functions would allow for positive action to be taken on both accounts

Timescales

The timescales for the establishment and transition of functions to a new body will be determined by a number of key factors. Firstly, the consideration and acceptance (or otherwise) of the recommendations for Professor Muir's review and the timing of any decisions. Secondly, the need for primary legislation, where this fits in the legislative timetable for the Scottish Parliament, and how the enacting of this legislation fits with the delivery of awarding within the annual

cycle. In considering timescales, the lead-in times associated with the delivery of awarding are a key factor that needs to be considered in determining the appropriate point of transfer of responsibilities. Smooth transitions are vital, particularly for younger learners and NQ awards. There cannot be any cessation of service during transition; the change must be seamless. There will be no 'good time' for this change as the awarding diet runs throughout the year, so this aspect of the reform must be carefully considered to minimise any disruption to learners.

It is likely that the longer the process goes on for, the greater the risk of perceived devaluing of SQA qualifications as the awarding function moves from one awarding body to another. During this time, the potential to lose valuable clients and employees is significant.

Likewise for the accreditation function, there is a risk that current approved awarding bodies may elect to surrender their approved awarding body status and that the transition may impact upon new awarding bodies seeking approval.

Public messages of business as usual will remain a requirement throughout the transition period to mitigate loss of confidence and uncertainty. It is important that both organisations being replaced (SQA) and reformed (Education Scotland) can work together with the Scottish Government to ensure that appropriate processes are in place, including governance arrangements, risk management, people and information management, and communication strategies. This also includes managing contractual liabilities including accommodation, facilities and equipment hire are considered and managed appropriately.

4.3 Considering the establishment of a new curriculum and assessment agency

Our strong recommendation is for an integrated curriculum, assessment and qualifications body which provides clarity on roles, functions, responsibilities and accountabilities through the continuum of high quality, credible and coherent learning and assessment founded and operating on a rights-based approach. Based on the need for independence from government to appropriately fulfil its functions, appropriate accountability frameworks to the Ministers and to the Scottish Parliament, and the relevant sources of finance to support such a body, we argue that an Executive Non-Departmental Public Body (NDPB) remains the appropriate model for the new body.

This analysis is based on a number of factors, including the need for the new body to operate within an agreed strategic framework for which Ministers are accountable to the Scottish Parliament; the financial arrangements that will underpin the new body (with a variety of income sources including grant-in-aid, fees and charges, including levy arrangements and commercial income); the requirement to contract annually with circa 14,000 external appointees to support awarding activity; the long-term requirement for the body to exist; and clear accountabilities, governance, decision making and compliance with statutory responsibilities.

In addition to these long held principles, given the recognition that SQA is currently an NDPB, any change in classification will impact significantly on the costs and complexity of transition, including those in relation to employment of staff who are public servants but not civil servants (which would be a requirement if other arm's-length structures were to be considered).

It is important that the new curriculum, assessment and qualifications body can make a significant contribution to the delivery of the national outcomes and objectives set out in the National Performance Framework, demonstrating the integrity of independent assessment, and deliver the priorities of Scotland's education system by providing impartial, expert advice to Ministers, the Scottish Parliament, learners and the public.

It is also important to highlight the need for high quality data and evidence to inform strategic direction. The new body could help to ensure effective monitoring and implementation of CfE principles, and that all stakeholders are playing their part. By having one body responsible for the development of curriculum, assessment, qualifications and accreditation, Scotland would ensure coherent, high quality, credible and sustainable qualifications and research. The system oversight and understanding will provide a key locus for all matters related to qualifications. It could also be said that a kitemark for this type of body would be extremely powerful for the nation, both within Scotland and internationally.

The appointment of a Board of Management and the composition of that Board would be a matter for Scottish Ministers, as would the supporting governance arrangements and structures, having regard for sound corporate governance. Stakeholders need to be more widely and meaningfully involved in the decision-making process, with learners supported when taking part in decision-making forums, and relevant stakeholders, including practitioners, being engaged at early stage so they can be fully included in the process. When setting up a new body, effective engagement with all stakeholders will be key to ensuring that they understand, articulate and agree how reform will benefit them and are clear about roles, responsibilities and decision making at local, regional and national level.

Reform will require resources over and above any new business as usual model, and therefore the funding model for the new body will need to continue to be a mix of expenditure supported by a revised fees and charges model and grant-in-aid funding for the foreseeable future.

Conclusion

We believe that Scotland should develop leading-edge curriculum and qualifications that support areas of national importance, and assessment approaches that reflect the skills and knowledge that are critical to learner success and embed the rights of the child. We believe that we should build on what we already have and reinforce the skills aspects of the curriculum to help bring the CfE capacities to life, whilst developing and maintaining national standards. Roles and responsibilities across the education sector need to be clearly defined, and the pathways should be an integrated system as CfE intended, but we should also be clear that we do not have to have structural reform to achieve this.

We should embed sustainable practices; promoting the rights of the child, equality, diversity and inclusion; supporting digital developments, whilst working in collaboration with schools and practitioners to develop a vision for their curriculum and how assessment will support their vision. This continuous engagement in an open and transparent way with learners, school, parents/carers and the wider community, should be informed by the local values and ethos, as well as by its location and surroundings, whilst remaining confident that approaches are consistent with national standards.

It is vitally important that, during the transition to a new curriculum, assessment and qualifications body, we do not lose the value of international education and the significance of our global networks. SQA has developed strong networks that will contribute to the Scottish Government's International Education Strategy for Scotland, promoting Scotland's education offer globally, increasing the number of international students to Scotland and maintaining our links with the European Union and beyond.

Our academic and vocational qualifications provided by the awarding function, gives learners in Scotland and beyond with an extensive and flexible range of learning opportunities. Having a single awarding body develop both types of qualification products — delivering academic, vocational and work-based qualifications and certification — provides opportunities to learn from each approach and develop qualifications that will continue to best support learners across Scotland. We must advance the HN offering and continue to enhance access to the tertiary system for pupils in the Senior Phase of school — working closely with experts across universities, colleges, and schools to ensure that there are good learner pathways through the education system.

We should further enhance tertiary education collaborations by sharing learning and best practice and pursuing solutions and new approaches through common endeavour. We must build on the feedback from stakeholders about what they value within existing approaches, recognising the distinct contribution of local, regional and national bodies, whilst maintaining a joined-up approach across the wider education system.

Qualification routes and progression pathways are dependent on accreditation and awarding functions working together. The new body should have appropriate

governance to ensure that the separation of responsibilities are clear and protected. Further investment in accreditation is required to ensure the regulator has a positive impact, helping to provide a credible qualifications market which drives forward a lifelong learning agenda, enriching individual's perspectives and opportunities, helping support a thriving economy and furthering Scotland's economic strategy.

The accreditation and regulation of a broader range of qualifications ensures that learners in Scotland will be secure in the knowledge that they are undertaking a qualification that has a value and assists with progression into employment or into further qualifications and supports lifelong learning.

By having one body responsible for the development of curriculum, assessment, accreditation and qualifications, Scotland would safeguard coherent, high quality, credible and sustainable qualifications and research. It could provide coherent support for practitioners on curriculum and assessment working with local and regional partners. A kitemark for this type of body would be extremely powerful for the nation, both within Scotland and internationally.

This coherence would provide an opportunity to back up learning and teaching and tease out broader capacities. Bringing curriculum and assessment together could help to achieve evidence on a broader level and broaden our understanding of both evidence and achievement, whilst reducing the restrictions on teachers' and learners' creativity, yet maintaining quality and standards. This could articulate the 3–18 curriculum more convincingly, with assessment as a natural mechanism for understanding learning and what the learner's next steps are.

We must remain ambitious for Scotland and ensure that our products, processes and services are co-designed and co-created with our customers and stakeholders using a rights-based approach. We must ensure that the products and services help learners at all stages of their education, life and work. The new organisation must adopt Fair Work in Scotland policies; be world-leading with fair work driving success, wellbeing and prosperity for individuals and the organisation. It must promote Scottish values and embed children rights in all policy development and decisions, as set out in the United Nations Convention on the Rights of the Child (UNCRC).

These reforms provide an opportunity to make a cultural change across the education system, designing a new structure that is fit for purpose, building on the strong foundations in people investment and values of a progressive organisation.

An overarching public body could provide one standard for Scotland, encouraging more collective ownership and accountability, in partnership with local authorities and close working with the tertiary sector. The new body can support local, regional and national partners, but it will not make the difference required if there is not a clarity of responsibility and investment in the infrastructure across the education system.

We must deliver a next generation operating model that is fully supported, sustainable, funded, secure and flexible. We cannot be limited in our ambition, supporting Scotland taking its place in the world using education and internationalisation as key pillars to build a stronger, fairer and more prosperous Scotland.

Key interactions

Policy formation and implementation	Regulation	Review and evaluation	Implementation

Policy on regulations and QA, national leadership, research, data and evidence based

Accreditation, regulation and SCQF

National and Vocational Qualifications delivery
(including commercial offer)

Support for practitioners for curriculum, assessment and pedagogy

Support for National and Vocational qualifications and assessment delivery in centres

Assessment review and development

Qualifications review and development

Curriculum review and development

Curriculum 3-18 and beyond