



The Educational  
Institute of Scotland

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25 February 2010

Ms Nicola Lynch  
Policy Officer  
SFC  
97 Haymarket Terrace  
Edinburgh  
EH12 5HD

Dear Ms Lynch

**EIS Response to the SFC Consultation on the College Curriculum in Glasgow City Centre**

I have great pleasure in attaching the EIS Response to the SFC Consultation on the College Curriculum in Glasgow City Centre for your consideration. I shall also be submitting this document to the Scottish Government as our response to their consultation as to whether they should support the formation of the proposed college in Glasgow.

I should advise you that this document is considered a public document by the EIS and thus may be shared with third parties.

In essence the EIS seeks a postponement of the proposed college's vestment day, since it remains unconvinced of the educational justification for its formation and until it receives the assurances asked for in this response and previously communicated to Eric Tottman-Trayner (chair of the proposed college's shadow board).

The EIS also believes that the SFC proposals for the College Curriculum in Glasgow City Centre have far reaching consequences for Scotland's FE Colleges. The EIS, therefore, seeks a meaningful consultation process and an opportunity to discuss these proposals with the SFC and other stakeholders directly.

Please do not hesitate to contact me should you have any queries regarding our response.

Yours sincerely

A handwritten signature in black ink that reads 'David Belsey'.

David Belsey  
National Officer  
Further & Higher Education

Encl.

## THE EIS-FELA RESPONSE TO SFC COLLEGE CURRICULUM IN GLASGOW CITY CENTRE CONSULTATION PROPOSALS

This is a response to the SFC College Curriculum in Glasgow City Centre Consultation and it should also be considered as the EIS response to the Scottish Government consultation on whether the proposed college merger should be supported.

### Educational Justification

The proposal of a new merged college occupying a new building seems to be the key to the proposed new arrangements. The EIS has long been of the view that support for such merger proposals is conditional on educational benefits being clearly demonstrated.

### Reduction in the Number of Students Served

It is quite clear from the SFC proposals that the new college building will have considerably less space than the city centre colleges currently have collectively. The proposals anticipate a reduction in demand for FE and use this as a justification for the reduced space. However, this projection is contradicted by the current reality where applications across Glasgow increased massively for session 2009-10. In one College they as much as doubled.

Demographic trends of births have changed in recent times and there is no certainty with any of these projections. The nature of FE and indeed HE has changed in recent years, with an increasing number of adult learners seeking retraining in our increasingly flexible workplace environment. This trend will be encouraged the longer Scotland feels the effects of the recession.

Attempts to persuade staff that reduced space will not necessarily mean reduced student numbers due to space efficiency measures are quite vague and we are sceptical to this claim. References to practices such as 'hot desking', 'learning corridors', 'open learning spaces' and 'flexible use of class rooms' are of great concern as they do not encourage the best teaching and learning environment.

We feel that, in their enthusiasm to see a high prestige new building erected, the SFC and other authorities have not given serious consideration to the possibility that retaining the present 4 college arrangement may be a cheaper and more effective way of providing Glasgow's curricular needs than the merger and major new build proposal.

*The EIS does not believe that demand for Further Education in Glasgow will diminish as set out by the SFC Consultation paper.*

*The EIS seeks a full costs-benefits analysis to be produced and published so that an informed consideration can be made of whether to support the proposed merger or not.*

### Economies of Scale

The proposals suggest the merger will produce significant “economies of scale” but fails to identify how these savings will be made. The assumptions listed that support the ‘economies of scale’ in Annex 5 of the SFC Consultation seem unrealistic and not to be based on any evidence.

Any economies of scale would be a financial driver for the merger, and the EIS cannot see any educational benefits deriving savings unless they are reinvested directly into learning and teaching at the proposed college. In other words, the economies of scale must be linked to educational outcomes.

The EIS is concerned that increasing proportions of college budgets are used for employing support staff and ever increasing managers. The EIS seeks economies of scale leading to an improvement in teaching and learning facilities will actually become a reality.

*The EIS needs to be shown a detailed breakdown of where these economies of scale will be achieved, and a commitment for them to be invested to frontline services that directly improve learning and teaching.*

### Lack of Certainty about the New College Building

Staff remain unclear as to what the new building proposals will actually entail. It was originally understood that it would consist of 2 sites, one in the Gorbals and the main one on the current Allan Glen site on Cathedral St. However, staff were subsequently advised that a major build on Cathedral Street was no longer viable, and that the Met Tower, Charles Oakley Building and Allan Glen Building would remain part of the New College with a more modest build on the Allan Glen site. According to this information the project was more refurbishment than rebuild. However, it now seems that we are back to the original proposal of a single site at Allan Glen.

*The EIS seeks further information regarding building proposals.*

### SFC subsidising Private Provision?

The EIS also notes the confusion around private provision (i.e. non-SFC funded work). On the one hand the SFC seem to be stating that the new build will assist in private provision “... substantial volumes of commercial or international provision exploiting both their city centre location and their specialisms. Housed in a new estate they will be even better

*placed to capture these markets.” Yet the SFC also states that it will not fund additional space for private provision “SFC capital funds are not available for these additional space requirements either for additional teaching space or for residencies.”*

This contraction is further confused by the SFC effectively stating that increasing amounts of private provision will be met by ‘infill’, the consultation document states: “Accommodating these students will affect the space requirement (albeit much of this business will be accommodated through ‘infill’ and improving the utilisation of the estate)”.

***The EIS seeks clarification from the SFC regarding the term “infill” and of its stance regarding funding capital projects that will be used to provide “substantial volumes” of private provision.***

#### **The balance between Higher Education and Further Education at the proposed new college and the SFC’s role in managing the curriculum**

There is some confusion in the consultation document about the term community college and the implications of a new college within Glasgow. There is also a new philosophy being developed by the SFC that it now seeks to micromanage the curriculum provision with Glasgow. For example, it is proposed that Schools-College partnership work be moved from the Centre to the ‘Community Colleges’ whilst level 7+ work will gravitate towards the Centre. By implication level 6- work will gravitate to the community colleges.

This example would destroy the diversification of curricular provision currently enjoyed by FE Colleges, by concentrating HE delivery at the new college and FE provision at the proposed “community colleges.” The EIS does not support this two tiered FE sector. The EIS further believes that this policy would not widen access to FE, but restrict access. Students in the city centre would need to travel away to obtain level 6 FE courses whilst students outside the centre seeking level 7 courses will need to travel inwards.

The cited example would also seem to adversely affect the colleges’ ability to deliver the “More choices more chances” policy as espoused by the Scottish Government.

The SFC Consultation acknowledges that the city centre colleges also serve communities and that many students prefer to undertake level 7 + study through the Community Colleges. This is surely an argument for maintaining the status quo, whereby both ‘community colleges’ and city centre colleges can respond to demand.

The colleges have no incentive in the current system to run courses inefficiently, and the Further & Higher Education Act (1992) gives college boards of management the main responsibility of ensuring adequate education provision. The SFC proposals reduce or even remove the ability of colleges to plan and provide a full curriculum that maximises individual student choice about where to study and so widens access.

The EIS supports the strategic role of the SFC to plan provision when it comes to high cost capital expenditure in certain specialist areas such as Music and Drama.

*The EIS notes the SFC's proposals to plan the college curricula in Glasgow, including its proposal that SUMs should be transferred from Stow College. College boards of management have previously taken the lead role in planning their curricula. The EIS believes that the SFC proposal to effectively take control of college curricula requires an open and transparent debate in its own right.*

*The EIS does not understand the concept of "community colleges" and seeks clarification as to the term.*

*The EIS does not believe that creating a two tier FE system within Glasgow or indeed Scotland, is in anyone's interest, least of all the students'. The creation of a large college specialising in HE (level 7) at the city centre and 'community' colleges specialising in FE (level 6) in outlying areas is something that the EIS does not support.*

#### Outreach Centres

The EIS sees no merit in the proposal to move the bulk of current outreach provision into the city centre. This proposal will lead to an educational detriment for those people who live outside the city centre, since many students would need to travel further to receive Further Education as it would be outwith their local community. This seems to conflict with the Scottish Government's "Widening Access" policy.

*The EIS would object to any reduction in outreach provision in colleges outside the city centre.*

#### The Host Model

The EIS had been led to believe that the merger would be a fusion of willing partners. It has become apparent that the model for merger is effectively the 'host model' and that the host is Glasgow Metropolitan. Previous 'host model' proposals have failed, for example proposed merger of GMC and GCNS. Many staff at both CCG and GCNS have concerns with the prevailing culture at GMC and therefore there is mounting concern that the merged college may be more of a take-over by GMC than a fusion of three colleges.

The EIS does note the appointment of Paul Little of Central College as Principal-Designate of the proposed college.

*The EIS does not favour the 'host model' for the college merger and this would be an important consideration in the EIS' deliberations.*

### The Effect on Stow College

Again, EIS staff in FE have believed that any proposed merger would come about on a voluntary basis following agreement between the boards of management concerned with the support of staff, students and the wider community. This proposed merger seems to be driven by other factors.

Stow college decided not to be part of the merger. It is proposed with the SFC Consultation in that much of the SUMs that Stow College delivers be transferred to the new city centre college against the wishes of Stow College. Stow College is in effect being included in the merger despite its clear decision not to take part. Some believe that Stow College is being made to suffer as a consequence of its decision not to merge with the proposed college. Furthermore, the proposed reduction to the number of SUMS that Stow College delivers could lead to it being an unsustainable entity in the medium term.

The SFC has suggested that employees of Stow would be transferred to the proposed college with the transfer of SUMS. The SFC needs to clarify this or it will face the charge of making assertions that it cannot deliver. The new college would in fact have no legally binding obligations to staff currently employed at Stow College.

***The EIS seeks an assurance that there will be no compulsory redundancies at Stow College or any other college as a result of the merger.***

***The EIS seeks an assurance that Stow College's SUMs will not be given away to the proposed new college that Stow College decided not to merge with.***

### Harmonisation of Conditions of Service

The SFC document suggests that staff will transfer to the proposed college under Transfer of Undertakings (Protection of Employment) (TUPE) arrangements, which effectively means that their current pay and conditions will be maintained. This is also what happened after the GMC- GCFT merger, and it created an unsatisfactory situation whereby 3 different sets of conditions continue to exist 6 years after the merger.

The fact that GMC has again been identified as the host does not encourage EIS members that there will be any commitment to the harmonisation of pay and conditions. If harmonisation is not agreed then the proposed college will have 6 different sets of conditions (and presumably pay scales) at the point of vesting.

The EIS has previously written to Eric Tottman-Trayner (Chair of the Shadow Board for the proposed college) seeking assurances regarding redundancies and the harmonisation of staff pay and conditions of service.

*Unless the shadow management of the proposed college give a commitment to agree a single set of conditions based on best practice in the constituent colleges and a timescale for achieving harmonisation then the EIS will oppose the proposals to merge.*

*If the new college is to be 'world class' then it must adopt staff conditions of service that foster an environment that leads to world class teaching and learning.*

### Redundancies

The EIS requires a clear commitment, without a qualifying clause, from management that there will be no compulsory redundancies as a result of merger. Prior to vesting day all members must know what their role is to be in the new structure. To date, only a limited undertaking regarding redundancies has been forthcoming. The Principal Designate has publicly stated on more than one occasion that he intends to advertise positions externally, this may lead to redundancies. We believe that the priority should be to utilise existing staff by matching them to positions under an agreed process to realise the full educational potential of any new college.

*The EIS seeks an assurance that there will be no compulsory redundancies as a result of the merger.*

### The Consultation Process

The EIS is very concerned that the three consultation processes associated with the proposed college may not be as meaningful as they seem to be running, after the shadow board has been formed and a principal designate is appointed.

A meaningful consultation should be carried out at a formative stage, when the responses may be acted upon. The EIS has not been consulted about the proposal to merge the Glasgow city colleges or invited to any meeting to discuss its formation. Once the shadow board was formed, the EIS was then invited to discuss some of the mechanics of how the proposed college would transfer staff.

Staff were given to understand that their attitudes, and those of students and the wider community would be taken into account before decisions were made. In fact, the decision to go ahead with the merger was taken months before the consultation process had even begun. The Principal Designate was appointed in December as was the Shadow Board. The Principal Designate has already stated that :

- Senior Managers in their designate roles by the end of March
- Middle Managers in their designate roles by April-May
- All other staff in their designate roles by May-June

*It is unacceptable to the EIS, that merger should be deemed a foregone conclusion on the basis of decisions made by unaccountable board of management members and a funding quango.*

*The EIS urges the vesting date to be delayed to allow full and meaningful consultation with a fair and proper consideration of the responses.*

### Disruption

If there is to be significant new build as part of the merger process then this will inevitably lead to disruption as staff and students are temporarily relocated. No clear plan for dealing with such disruption has ever been presented to staff. This is compounded by the confusion over whether a new build is to take place and what refurbishments are to take place. Staff should be made aware of the new build proposals and the plans for coping with temporary location well before the vesting day.

*The lack of detailed planning into the logistics of any merger with respect to buildings is a further reason to accede to a postponement of the proposed college's vestment day.*

### Planning Assumptions

The EIS has no problem with the planning assumptions in the main. However, we do not see that it is self evident that the objectives, behind the assumptions, could not be met by retaining the current four Glasgow city central colleges.

*The EIS does not believe that the planning assumptions and objectives give an educational justification for the proposed college.*

### In Whose Interest is the Merger?

The EIS remains unconvinced that merger of the city centre colleges best serves the interests of education in the West of Scotland, the community, most of the staff or the students. There is a perception that past merger attempts may have failed when senior staff have realised that the final entity does not match their own personal ambitions.

*The EIS has seen no evidence to suggest that a merger will benefit the students or staff, or even the wider community. The EIS believes that any cost savings should be kept by the proposed college, and thus the merger should not be driven by a desire to make savings.*

### New concepts introduced by the closed SFC Consultation paper that require further consultation

There seems to be three new concepts that have been slipped into a closed SFC consultation on the Glasgow City curriculum that require a full and meaningful consultation with stakeholders.

#### 1. SFC primacy over FE curriculum provision in an area

The Further and Higher Education Act Scotland (1997) states that College Boards of Management have:

- (1) A board of management shall have the duty of—
- (a) managing and conducting their college; and
  - (b) ensuring that their college provides (either by itself or by arrangement with any other person) suitable and efficient further education to students of the college,
- and in carrying out their duty under paragraph (b) above, the board shall have regard to the provision of education in the area in which the college is situated and to the likely needs of persons desirous of becoming students of the college.

This clause has, in effect, allowed the FE Colleges to plan, manage and deliver their own curricula.

The SFC seem to be seeking to take away individual colleges' ability to plan, manage and deliver their own curricula by proposing to fund a SFC shaped curriculum in Glasgow. A specific consequence of this proposal is to take SUMs (and therefore part of the curriculum away from Stow College.)

The Further and Higher Education (Scotland) Act (2005), states:

*"It is the duty of the Council to exercise its functions for the purposes of securing the—*

- (a) coherent provision by the fundable bodies (as a whole) of a high quality of fundable further education and fundable higher education;"*

The EIS may support a greater coordination of curricula delivery by the colleges but the EIS needs to be convinced that the SFC, a funding quango, is the body to oversee and plan the coordination of individual college curricula. The two passages of law quoted above do not clearly differentiate between the roles of the SFC and college boards of management.

***It is EIS policy to abolish College Boards of Management and bring colleges into the governance of the Scottish Government. The EIS needs to be convinced that the SFC should be the body that plans and oversees individual college curricula or that for a geographical area . The EIS would wish that this policy or proposal be properly discussed within a meaningfully consultation.***

#### 2. Development of two tiered FE system

The proposed college, if set up with the curriculum proposals set out in the SFC consultation document, would be very different to the colleges outside Glasgow city college. The SFC consultation document labels the colleges outside the city centre as

'community colleges'. The SFC seems to be proposing a two tier FE system within Glasgow and possibly outside Glasgow at some later point.

*The EIS is not necessarily against some colleges developing specialisms but it is against the formation of a two tiered FE sector. The EIS does believe in the Scottish Government priorities of 'widening access' and offering 'more chances' to those wishing to pursue Further Education. Such aspirations however are only available to all, if all colleges are able to offer a full curriculum. The proposals, as set out, favour the metropolitan population at the expense of the more rural areas around Glasgow, and this is something that the EIS cannot support.*

### 3. Community Colleges

There has not been, to the EIS' knowledge, any sector wide discussion and consultation on the concept of 'community colleges'. The term is used within the consultation document as if it is a standard term, yet the EIS does not recognise it.

*The EIS would welcome a discussion and meaningful consultation on the community college concept.*

### Conclusion

The EIS seeks a postponement of the proposed college's vestment day, since it remains unconvinced of the educational justification for its formation and until it receives the assurances asked for in this response and previously communicated to Eric Tottman-Trayner (chair of the proposed college's shadow board).

The EIS also believes that the SFC proposals for the College Curriculum in Glasgow City Centre have far reaching consequences for Scotland's FE Colleges. The EIS therefore seeks a meaningful consultation process and an opportunity to discuss these proposals with the SFC and other stakeholders directly.

Please contact David Belsey ([dbelsey@eis.org.uk](mailto:dbelsey@eis.org.uk)) should you have any queries regarding this document.