



Falkirk College
of Further & Higher Education

Consultation on the Merger of the Scottish Further Education Funding Council and the Scottish Higher Education Funding Council

Falkirk College Response

Falkirk College is grateful for the opportunity to contribute to the consultation on proposals to merge the two Funding Councils.

In principle, we are supportive of the key proposal to merge the two Funding Councils and we welcome the Executive's emphasis on a more integrated view of lifelong learning and a movement towards greater parity of esteem between FE and HE. However there is a real risk that the distinctive mission of FE - ie the provision of vocational skills and training which lead to employment - or are undertaken by those already in employment - could be undermined by over emphasis on degree level work or progress to HEIs. It will be important that the links between the FE Sector and Scottish Enterprise on skills, workforce development etc are further extended in parallel with Council merger developments. At a time when there is also strong emphasis on the School/College interface it will be increasingly important that FE's diverse and complex client/stakeholder base is recognised and reinforced and is not diminished by the narrower focus on FE/HE perspectives.

In pursuit of these aims we believe the legislation should treat FE and HE sectors the same, wherever practicable, while protecting the autonomy and diversity of individual institutions and the distinctive mission of each sector. As such we consider it is a mistake to continue to exclude HEIs from the requirements of the Public Finance and Accountability (Scotland) Act 2000 (para 126).

We appreciate that this consultation is not about the allocation of funding but consider that the interests of higher education students studying in Further Education Colleges could be more effectively addressed within the new arrangements if there were more equitable levels of investment across both sectors.

We are in favour of developments that support and assist students and, in particular, we are pleased with the following points from the consultation document:

- recognition that all partners have an equal and varied contribution to make (para 16)
- coherent linkage between the objectives of post-school education and Scotland's national economic objectives (paras 35, 36)

- view not to exclude colleges from receipt of 'research' funding recognising their importance in knowledge transfer (para 64)
- requirement for lecturing staff to gain an appropriate teaching or professional qualification in order to provide a fully trained workforce for both Sectors. Timescale and resources would have to be aligned to ensure this.
- powers to support the development of articulation (para 103) as long as this does not distort FE's employability mission.

We do not consider that the term 'tertiary' is well understood or attractive to users and although STEP may provide a convenient label for internal funding purposes it should not be adopted for wider use. The current terminology of University and College has significant currency and should not be abandoned. The title of the new Council should be the Scottish Further and Higher Education Funding Council.

We are opposed in principle to the creation of other providers as STEPs with access to public funding. The level of constraint on public expenditure which has capped growth in FE colleges in the face of growing demand for lifelong learning would make inappropriate any further dilution of resource to meet the needs of additional providers.

We also have a concern about the power for STEFC to call for and attend extraordinary meetings of governing bodies. While accepting the assurance that this right will only be used in extraordinary circumstances, its inclusion in the legislation is a threat to the autonomy of institutions and has potential for abuse.

Other areas of the proposed legislation on which we wish to comment are:

para 1 - the term 'to secure adequate and efficient' is insufficiently defined and open to wide interpretation.

para 24 - the requirement to prepare annual plans would be more appropriately included in the Financial Memorandum or as a condition of grant.

Finally, we believe that the proposal that the Public Services Ombudsmen should be the final arbiter on (non academic?) student complaints requires to be carefully considered prior to inclusion in the bill – particularly in relation to defining the areas of complaints over which the Ombudsmen would have jurisdiction. Colleges and Universities operate highly effective and transparent complaints procedures. This new addition would add to the cost and complexity of managing such processes.

As well as submitting its own response to the consultation, the College has contributed to, and is supportive of, the response from the Association of Scottish Colleges (ASC).