

## **Response by Perth College to the Scottish Executive Consultation Paper on the proposed merger of the SFEFC and SHEFC**

Perth College welcomes the opportunity to offer comments on the Executive's proposals and forthcoming legislation on the merger of the Scottish Funding Councils. We are aware that there are three collective responses to this Consultation with which we might be assumed to be associated. They are the responses of the UHI Millennium Institute (UHI), the Association of Scottish Colleges (ASC), and the joint response of ASC and Universities Scotland (ASC/US). Our comments will be primarily concerned with and related to these collective responses, and we briefly identify below those points we would wish to emphasize and those issues on which we are not in agreement with the collective view, concluding with some further comments of our own.

The UHI response is broadly reflective of our views, and we would endorse UHI's support for the Executive's four key priorities. We would also wish to stress our agreement with the argument in UHI's paragraph 1.6 that the legislation should focus on the prime purpose of the merger and not seek to set out in unnecessary detail how the new council or the funded institutions should discharge their responsibilities. We concur with UHI's view that funding should follow mission and would emphasize the magnitude of the challenge facing the UHI and its Academic Partners in sustaining high-quality HE provision in sparsely-populated and remote communities for a student population which includes high proportions of non-traditional entrants (paras 3.2, 3.4). We also agree strongly with the argument in para 3.3 that differential funding by level/year of study would seriously disadvantage the UHI and its partner colleges and would oppose any move in this direction.

In general, but subject to the comments made in the preceding paragraph, we would endorse the response made by the ASC. On balance, we would agree with ASC's view that some ministerial determination of the sums to be allocated to each of what are now the distinct sectors of further and higher education would be preferable to an aggregated quantum for the council to share as it saw fit, at least in the short to medium term. We would not necessarily see this as a permanent feature of the new system, however. We endorse ASC's view that legislation to empower Ministers or the new funding council to become involved in encouragement and facilitation of cross-sectoral mergers is unnecessary and undesirable, and agree that effective partnership and collaboration does not require coercion or external intervention. Our experience in collaborating very effectively with both UHI and Tayside partners strengthens this conviction.

We would endorse the views expressed in the joint response made by ASC and Universities Scotland.

In addition to these comments made in support or qualification of the collective responses, there are two further points the College would like to make.

Firstly, we would suggest that the issue of funding of bodies other than those colleges and universities currently recognised for funding purposes should be approached cautiously. The experience of public funding in the private training market and in such schemes as Individual Learning Accounts has not always been positive. We need high levels of clarity and confidence about what is being funded, how it compares with existing funded provision, to whom the funding is going and the track record of those concerned in academic, financial and governance terms.

Secondly, we would urge the Executive to take the opportunity of the forthcoming legislation to reduce the extent of unnecessary intervention and over-specification by funding or auditing bodies in the operation of post-school institutions, which are generally well-managed and almost ludicrously over-audited. This high level of 'micro-management' does nothing to help

achieve either institutional missions, which are by definition at the heart of what we do, or Ministerial objectives, which are well-supported and well-understood. Excessive intervention inevitably distorts and hampers institutional management because it can never appreciate the local picture and local needs. Expressed more positively, we need the new funding council to be strategic, visionary, enabling and light in touch, focusing on ends rather than means. Other bodies whose work impinges on the sectors should be required to accommodate this approach and to collaborate to minimise interference and disruption.

We have no strong view on the naming of the new merged body, but feel that universities and colleges should find a place in the title somewhere.

I trust that these comments are helpful.

Mike Webster

Principal