



Scottish Government Consultation: Post- Education and Skills Reform

Submission

27.08.24

About the Open University in Scotland

The Open University in Scotland supports people across Scotland to develop their knowledge, acquire new skills and achieve life-changing qualifications.

In 2022/23 we were proud to help over 19,500 students study around their professional or personal life at a pace and level that worked for them. The recently published HESA data (2022-23) shows that apart from The University of Glasgow we teach more Scottish students than any other university in Scotland and are by far the largest provider of flexible, part-time study.

Flexible study is core to our offer with 73% of our students working either full-time or part-time in 2022/23.

Most of our graduates (85%) remain in the location where their study is undertaken, which means their talent and skills benefit local communities.

We offer high-quality distance learning to students, lifelong learners, communities, employees and businesses. Our students range from school age to 92. We have formal partnerships with 16 regional colleges and collaborate with local authorities, the NHS, social care, the third sector and employers across Scotland. Our innovative national schools programme, Young Applicants in Schools Scheme, helps S6 pupils access a broader curriculum and bridge school to university level study.

We are committed to widening access to higher education building on our founding principle of being open to everyone, regardless of age, income, geography and background. The majority of our undergraduates in Scotland are eligible for a part-time fee grant to help towards their tuition fees. In 2022/23 28% of our undergraduates in Scotland declared a disability and 22% live in remote or rural areas. In the same year, 23% of our undergraduate entrants joined with qualifications below standard university entrance level and 21% were resident in the most deprived areas of Scotland.

As part of the UK's only four nations university, we are funded to teach students resident in Scotland by the Scottish Funding Council. Over 150 staff operate from our Edinburgh offices with over 400 associate lecturers working across the country. Our student experience is rated the best in Scotland (National Student Survey 2024).

OU research ranks in the top third of UK universities according to the Research Excellence Framework and we are a trusted partner of many leading organisations for teaching and research including the BBC, NASA, and the United Nations. We received a Gold Rating in the Teaching Excellence Framework 2023. Our free platform, OpenLearn, reaches over 300,000 learners in Scotland.

Find out more: open.ac.uk/scotland

Chapter 2. Simplifying responsibilities for apprenticeships and student support

Q1. Which of the three proposals do you prefer?

We would give qualified support for Proposal 2. Our submission to the Withers Review called for “an increased alignment and streamlining of delivery agencies with the operational savings retained in the sector to invest in skills”. We believe that Proposal 2 goes some of the way to meet this.

Q2. What do you think are the main advantages of your preferred proposal?

By transferring the responsibility for student support in Further Education (FE) to the Students Awards Agency Scotland (SASS) there exists an increased potential for a coherent system for all students. Our submission to the Withers Review called for “a system that provides parity of esteem for those seeking to study part-time to develop their skills”. We would like to see part-time study treated on an equitable basis with full time study. We set out in our submission the range of ways in which part-time students are disadvantaged compared to their full-time peers. We have subsequently taken this up with the respective ministerial team and would be happy to supply further details on request.

Currently the system that supports Graduate Apprenticeships – where the Scottish Funding Council (SFC) and Skills Development Scotland (SDS) are both involved from a funding and particularly a reporting perspective causes confusion and an administrative burden. There is a duplication of effort in terms of double reporting the same information to two systems for providers and

confusion from apprentices and employers by way of misunderstanding over who is involved. The proposal would hopefully address these issues.

Q3. What do you think could be the biggest challenges with your preferred proposal?

The proposal in itself doesn't address the issue of student financial support and the challenge of focussing on the needs of those who are furthest away from the job market and the least likely to be able to take up opportunities to develop themselves – those with protected characteristics and to encourage wider access to education for all. Nor does it address the need to support businesses and employers to attract, retain and develop their workforce to support their business ambitions and to respond with agility to opportunities to grow their business and increase innovation and productivity. That activity will happen outside of these proposals but hopefully in a coherent and joined up way.

In relation to apprenticeships neither does the proposal address the need for greater flexibility to meet the needs of employers and prospective students. Current Graduate Apprenticeship Frameworks are designed for a 4-year, 480 credit, full time Apprenticeship only (or 2 year full-time for postgraduate); there is no flexibility for delivery on a part-time or flexible basis.

Our experience highlights the issue of equity in this model for those who require/choose to work at less than full time hours – precluding caregivers, those with disabilities and those seeking flexible hours from taking part in Apprenticeships. This prohibits widening access – particularly for those who would require to work part-time or need to flex their apprenticeship, for example

due to illness, caring responsibilities or financial reasons. This is reliant on the provider having bid and secured funding in subsequent funding rounds. It is at odds with the Scottish Government's Fair Work agenda.

In addition, the current SFC funding model which provides funding for 1 year only – thereby requiring the HEI provider to accept apprentices onto the 4-year programme 'at risk' – exacerbates these issues.

Q4. Are there any other factors you think we should consider in making a decision?

Our submission to the Withers Review also called for "the adoption of an agreed definition of skills, including meta skills, which is understood across the country. Currently there are too many interchangeable definitions in use across the sector and a holistic understanding is required." We don't believe that any of the proposals addresses this issue.

Chapter 3. Governance of the Scottish Funding Council

Q5. Should the 2005 Act be amended to remove restrictions in respect of Board appointments?

No. We believe that a limit on length of term and on re-appointments are good principles of governance. We would refer you to Universities Scotland's submission.

Q6. If SFC takes on responsibility for all apprenticeship funding, what additional skills, knowledge and experience should be considered for Board members?

We would refer you to Universities Scotland's submission with the additional perspective of the part-time learner to be considered. There remains a persistent default position of a four-year full time undergraduate perspective when tertiary education matters are considered.

Q7. Do you have any other comments of suggestions for governance of the SFC Board or other aspects of SFC governance?

We would refer you to Universities Scotland's submission with the additional perspective of the part-time learner to be considered. There remains a persistent default position of a four-year full time undergraduate perspective when tertiary education matters are considered.

Chapter 4. Enhanced functions for the Scottish Funding Council

Q8. Do you think we need to introduce new duties on organisations receiving public funding to provide better information to SFC?

No. The conditions of grant should be enough to ensure that accurate and timely information is supplied to SFC. From our perspective a more open and transparent discussion on what data and why it is needed would be of more practical benefit than new duties being introduced.

Q9. Do you think we need to strengthen existing systems and processes for collecting data. If your answer is yes, then please explain why the data is needed.

Yes. By that we mean a streamlined system which removes and/or significantly reduces the reporting burden on institutions. We're not necessarily suggesting the collection of additional data rather than the cross-reporting with little impact at the other end. How does these proposals relate to the new Outcome Agreements being implemented within the sector.

Q10. Do you think there is a need to strengthen existing systems and processes for reporting and publishing data? If your answer is yes, then please explain the purposes for which you or others might use the information.

Yes. By that we mean a streamlined system which removes and/or significantly reduces the reporting burden on institutions. We're not necessarily suggesting the collection of additional data rather than the cross-reporting with little impact at the other end.

