

Island Communities Assessment for the Independent Review of Qualifications & Assessment and the Scottish Government Response

September 2024

Overview

Title of Policy	Scottish Government response to the Independent Review of Qualifications and Assessment
Lead Minister	Cabinet Secretary for Education & Skills
Lead Official	Laura Murdoch, Deputy Director
Division	Curriculum & Qualifications Division, Education Reform Directorate

Introduction/Disclaimer

This ICIA has been carried out in accordance with the Islands (Scotland) Act 2018 (the Act). In particular, Section 7 duty of the Act according to which a Relevant Authority must have regard to island communities in carrying out its functions.

The Act places a duty on Scottish Ministers and other relevant authorities to have regard to island communities in exercising their functions, and for Scottish Ministers this will also include the development of legislation.

This Island Communities Impact Assessment was carried out between July 2023 and March 2024. Revisions were made to the assessment up and until September 2024. It involved policy teams and analysts across the three most impacted directorates. i.e. Education Reform, Learning Directorate and Lifelong Learning & Skills. Findings are based on: desk-based research; the formal analysis of the stakeholder engagement carried out during the Independent Review; and feedback that took place after the conclusion of the Review.

This impact assessment is part of a suite which also includes an Equalities Impact Assessment, a Children's Rights and Wellbeing Impact Assessment a Fairer Scotland Duty Assessment and a Consumer Duty Impact Assessment.

It is important to note that this Impact Assessment relates to the recommendations in the report in order to provide advice for Ministers. The approach has been to make a high-level assessment of the key recommendations and the SG response to them. Further Impact Assessment(s) may be required as any response is taken forward.

Section 1 – Background

1.1 What are the objectives and aims of the proposed policy?

The Scottish Government supports the evolution of Scotland's approach to assessment in the Senior Phase. Senior Phase reform is an integral part of our wider plans to improve curriculum, qualifications and outcomes for young people.

The aims of the proposed changes outlined in the Scottish Government response to the IRQA are to ensure that all young people in Scotland experience an education system that, in the words of the final report of the [National Discussion on Education](#), "is ambitious, inclusive and supportive".

This assessment should be read alongside the full Scottish Government response. A summary of the proposals in the IRQA and the Scottish Government's response are provided below:

IRQA Proposal: Scottish Diploma of Achievement (SDA)

Details of proposal: A Senior Phase leaving certificate with three mandatory elements: Programmes of Learning, Personal Pathway and Project Learning. Pupils have an entitlement to experiences in all three elements. The SDA is awarded at point of exit from Senior Phase.

Scottish Government response:

- The Scottish Government understands the potential benefits of a leaving certificate as a means of recognising a broader range of a young person's achievements, with the award being flexible to reflect all levels of ability.
- A leaving certificate has the potential to create a more inclusive approach to qualifications and could provide particular benefits for young people with additional support needs and disabilities.
- The Scottish Government understands that more work needs to be done to determine the content of the leaving certificate and establish how it will operate.
- We will endeavour to undertake further testing with Scotland's teaching profession directly – on the best and most appropriate route forward which may support a leaving certificate in the future.
- The Scottish Government believes the Scottish Credit and Qualifications Framework (SCQF), often cited as a highly valuable element of Scottish education, will have a key enabling role in respect of the creation of an inclusive leaving certificate that meets the needs of all pupils.

IRQA Proposal: Programmes of Learning

Details of proposal:

- Courses should be designed in modules to allow accumulation of credits over time.

- There should be a diversification of assessment methods. No external exams at National 5.
- The Senior Phase offer should be rationalised.
- Digital methods of assessment should be introduced.

Scottish Government response:

Qualifications Scotland will work in partnership with teachers, pupils and other key stakeholders, to:

- Take steps to remove external written examinations in practical subjects where appropriate, with changes starting to be implemented from 2025/26.
- Work towards extending the range of approved assessment methods which could be used for national qualifications to better support changes in the balance of assessment.
- Pilot digital onscreen assessment across various subjects, including Computing Science given this is a subject area ripe for consideration. This work will start in 2025.
- Set out a longer-term programme of work to rebalance assessment methods across all national courses, which will align with curriculum improvement cycle activity where possible.
- Rationalise the qualifications offer in the Senior Phase, starting with the Creative, Hospitality and Sport and Technology, Engineering and Construction Sectors (which represents 800 qualifications and awards), the first phase of which is due to complete in December 2024 with other sectors and national courses to follow.
- Starting in 2024, explore models of how graded national courses such as National 5, Higher and Advanced Higher could be organised into 'modules', to allow pupils maximum flexibility to build credit as they go. Learning from the previous experience with unit assessments (which were ultimately removed) and research into different approaches to 'modularisation' in other jurisdictions, will be taken into consideration.
- Implement changes to assessment which are proportionate and take teacher workload into consideration. This partnership approach will be emphasised through the participative governance structures planned for Qualifications Scotland, the detail of which is set out in the recently introduced Education (Scotland) Bill.

IRQA Proposal: Project Learning/Inter-disciplinary Learning

Details of proposal: Pupils should undertake an Inter-disciplinary learning (IDL) project which is SCQF levelled.

Scottish Government response:

- Further work is required if IDL is to become a mandatory part of the Senior Phase curriculum in all secondary schools. We note the recent publication by HMIE of the National Thematic Inspection on Curriculum Design which states that IDL remains an underutilised element of

curriculum design and that staff require a better understanding of the principles and benefits of this approach to learning.

- Building on the existing IDL co-design group facilitated by Education Scotland, a refreshed working group, chaired by a senior secondary school teacher experienced in the delivery of IDL, will bring together relevant partners already active in this space. This group will lead a new phase of work with the objective of better determining the place of IDL in secondary schools while ensuring an equitable offer for all young people.
- There are a number of organisations and schools already working in this area including Dollar Academy and Grove Academy (Dundee City Council), SCQF, the Wood Foundation, Daydream Believers and Powering Futures and we will ensure they are all involved in shaping our collective next steps. It is imperative that any new model is tested in a range of schools before wider adoption. This exercise will also help expand our shared knowledge as to the ways IDL could be embedded into a school's curriculum including in respect of timetabling while also considering the place of accreditation in this curricular area.

IRQA Proposal: Personal Pathway

Details of proposal: Pupils personalise their qualification profile by selecting aspects of their experiences that reflect their interests, the contributions they make to society and their career aspirations in employment and discuss these in a reflective way.

Scottish Government response:

- Education is not just about the qualifications a young person achieves. The enduring aim of Curriculum for Excellence is that all young people develop the 'four capacities' to become: successful learners; confident individuals; responsible citizens; and effective contributors.
- Young people in Scotland have the opportunity to undertake a wealth of activity that builds their skills and confidence, and this breadth of achievement should rightly be recognised and celebrated.
- We are committed to continuing to explore how best to recognise such achievement with a range of stakeholders, including young people. In doing so, and before considering whether or not wider achievement could ultimately be included as part of any leaving certificate, we will need to work through significant concerns raised by a wide range of stakeholders – principally, that doing so risks entrenching and exacerbating social inequity.

IRQA Proposal: Digital Profile

Details of proposal: All pupils should have access to a digital profile as a way of showcasing their experiences and achievements. It should be learner led.

Scottish Government response: An initial profile has been developed within the My World of Work platform currently managed by Skills Development Scotland. To support continued development of the profile and help ensure its effective use in schools, an experienced secondary school leader will be seconded into Education Scotland to work with Skills Development Scotland (SDS) and the current qualifications body.

IRQA Proposal: Support for teachers

Details of proposal: Teachers need time and high-quality professional learning.

Scottish Government response:

- Take steps to ensure appropriate support for teachers to effectively deliver new forms of assessment or where necessary, test practice related to IDL.
- Prioritise work through the SNCT to deliver a reduction in contact time.
- Support schools to deliver high quality teaching and learning including through the establishment of the Centre for Teaching Excellence. The Centre will ensure research and evidence is distilled into practical and digestible support for all teachers, no matter their career stage while helping the development of innovative classroom practice.

IRQA Proposal: Qualifications naming convention

Details of proposal: In a bid to strengthen parity of esteem between different types of qualifications there should be a move to use the Scottish Credit and Qualifications Level as the key descriptor followed by type of qualification. For example, SCQF Level 6 – Higher.

Scottish Government response: Ask the current qualifications body and qualification providers in Scotland (e.g. universities), to ensure consistent use of SCQF levels in their titles to support a clear description of all qualifications (e.g. Higher English, SCQF Level 6).

IRQA Proposal: Artificial Intelligence (AI) commission

Details of proposal: Establish a Cross Sector Commission on AI.

Scottish Government response: The Scottish Government will work with Qualifications Scotland and Education Scotland to ensure that AI can be used effectively and safely in learning, teaching and assessment. We will also ensure our education bodies have access to experts from Scotland's leading universities in AI advancements, as well as from outside the education sector, so that our thinking reflects best practice in what is a fast moving and complex area and benefits both teachers and pupils.

IRQA Proposal: Method of engagement / culture change that puts teachers and young people at the centre.

Details of proposal: Continue the process of cultural change. Scotland should retain the structure of the Independent Review Group (IRG) and allied Collaborative Community Groups (CCGs) as a key method of engagement, as the country introduces and develops new approaches to qualifications and assessment.

Scottish Government response: Ensure all key stakeholders including young people, parents/carers, universities, colleges, and employers are involved in discussions to come. We will continue to ensure the views of teachers are listened to and reflected as changes to assessment practices are enacted. This will include ensuring that secondary teachers are given the opportunity to lead on the input required in terms of changes and improvements in respect of their own subject area.

1.2 What do we mean by island communities?

The policies being taken forward will impact primarily on young people undertaking the Senior Phase of education from the point at which any changes are implemented. Impacts will be around their experience of school and gaining qualifications and also in terms of how the wider system responds to those changes including parents, schools and their wider communities, colleges, training providers, universities, employers and others. It is recognised that we need to consider if these impacts may differ in the Island Local Authorities of: Orkney, Shetland, Highland, North Ayrshire, Argyll & Bute and Comhairle nan Eilean Siar.

1.3 What are outcomes of the policy how might they differ in the islands?

The Independent Review's final report proposes a vision for the future of qualifications and assessment in Scotland which is "an inclusive and highly regarded Qualifications and Assessment system that inspires learning, values the diverse achievements of every learner in Scotland and supports all learners into the next phase of their lives, socially, culturally and economically."

Recommendations which *may* have a differential impact in the islands are shown in Section 3. In the main differences could, in particular, relate to the availability of opportunities as part of the SDA, digital infrastructure and Gaelic language. It is also recognised that there will be intersectionality between these issues and those such as equalities, poverty and children's rights. Whilst none of the 15% most deprived datazones in the Scotland 2020 SIMD¹ data are in Shetland, Orkney or the Western Isles, there will still be people experiencing deprivation living on islands.² The Evidence Review on Rural Poverty (2021)³ found, for example, that island communities weekly food, clothing and household goods costs, home delivery and particularly travel costs are higher in the islands and remote rural Scotland, compared to urban areas in the UK and that traditional measures of poverty such as

¹ 2020 SIMD are the latest SIMD figures available

² [Scottish Index of Multiple Deprivation 2020: introduction - gov.scot \(www.gov.scot\)](https://www.gov.scot/resources/consultations-published/scottish-index-of-multiple-deprivation-2020-introduction)

³ [Evidence Review on Rural Poverty \(2021\)](#)

free school meals do not account for this. The Scottish islands: data overview 2023⁴, also found that rates of fuel poverty are generally higher in the island Local Authorities with around a third of residents experiencing fuel poverty in Argyll and Bute (32%), Highland (33%), Orkney Islands (31%) and Shetland Islands (31%) councils and as many as 40% in Na h-Eilean Siar, while the average for Scotland is 24%.

This assessment will explore these issues, set out how we have consulted with stakeholders, present the evidence gathered and make an assessment of potential impact.

1.4 Human Rights

We have a legal obligation to ensure new policy and legislation meets legal obligations and does not breach human rights. In development of the policy, we have considered human rights and have set out our considerations across the suite of Impact Assessments.

We have considered Article 26 of the United Nations Universal Declaration of Human Rights. This states that “Everyone has the right to education. Education shall be free, at least in the elementary and fundamental stages. Elementary education shall be compulsory. Technical and professional education shall be made generally available and higher education shall be equally accessible to all on the basis of merit.” The response to the IRQA will not have any impact on the overall provision of education as described by Article 26.

Section 2 – Consultation & Evidence

2. The Consultation Process

Phase 1 of the Review:

The first phase of consultation was on the proposed vision and principles for the work via schools and colleges and Collaborative Community Groups (CCGs).

Phase 2 of the Review:

A second phase began in October 2022, including a public consultation hosted on the Scottish Government's Citizen Space portal between October 2022 and January 2023⁵

Phase 3 of the Review:

The Phase 3 engagement ran from 3 March until 31st April. This sought views on a high-level overarching model for qualifications and assessment via discussions with Collaborative Community Groups (CCGs) and allied discussion groups, led by

⁴ [The Scottish islands: data overview 2023](#)

⁵ [Supporting documents - Qualifications and Assessment Review: consultation analysis - gov.scot \(www.gov.scot\)](#)

members of the Independent Review Group, and an online survey to schools and colleges.

Post-Publication

Since the publication of *It's Our Future: The Independent Review of Qualifications & Assessment*⁶ the Scottish Government has welcomed views in writing and in person. This has been supported by an online survey to schools and colleges.

2.1 How Were Island Communities Represented?

Members of the Independent Review Group, which supported Professor Hayward, chaired Community Collaborative Groups. The significant number of individuals and organisations involved are listed in Annex 9 of the final report⁷. It is worth noting that as well as a wide range of national organisations and agencies specific communities of interest relating to islands participated.

In addition, all local authorities (including the six island authorities) were consulted at all stages via the Association of Directors of Education Services (ADES).

Community Collaborative Group members

- Learners Group - Gaelic Medium (Gaelic and Scots Group via Young Scot)
- Parents and Carers Group - Comann nam Pàrant
- Headteachers Group - Portree High School, Skye
- National Agencies Group - Senior Education Officer, Gaelic, Education Scotland
- Inclusion & Equality Group – ASPIRENorth and University of Edinburgh, Gaelic Medium Education
- Further Education Group - University of the Highlands and Islands
- Higher Education Group - University of the Highlands and Islands
- Public & Third Sector Employers Group - Bòrd na Gàidhlig

Other Stakeholders

Professor Hayward also met the following individuals and organisations as part of the Review:

- Gaelic Medium Education Stakeholders Group
- Teachers group, Highland Council
- Oban High School with video link discussion with Tìree High School
- Teachers, young people and Council officials on Shetland

⁶ [It's Our Future - Independent Review of Qualifications and Assessment: report - gov.scot \(www.gov.scot\)](http://www.gov.scot)

⁷ [It's Our Future - Independent Review of Qualifications and Assessment: report - gov.scot \(www.gov.scot\)](http://www.gov.scot)

2.2 Stakeholder Evidence

The Phase 2 consultation allowed learners, parents, teachers and stakeholders to express their views on how the vision and principles established in Phase 1 might be implemented. Whilst no specific themes around islands emerged there were comments made by a small number of respondents concerning Gaelic and Gaelic Medium Education:

“This is a great opportunity to work towards a system that is more equitable and inclusive. At the moment pupils in GME are unable to access a full Gaelic medium curriculum, 3-18. The majority of GME pupils still do not have the opportunity to continue to develop their language skills in secondary education. This is an essential area for development relating to GME pupils. The rights of GME pupils to gain awards and qualifications through Gaelic must be guaranteed in any system and evidence provided that these rights are safeguarded.” - Comann nam Pàrant (Nàiseanta)

The Phase 3 engagement ran from 3 March until 31st April. The responses comprised 311 School and College survey responses; 34 non-survey responses submitted directly to Scottish Government; and 19 Collaborative Community Groups (CCG) and allied discussion group meeting reports, representing over 400 people. Whilst no specific island issues were raised the following comments were made in relation to rural and Gaelic matters:

- Learners from disadvantaged backgrounds, lower socio-economic areas and rural areas would have far fewer opportunities to achieve the Personal Pathway element of the Diploma than others.
- This also links to wider equity concerns relating to the setting itself: those located in lower socio-economic and rural areas were likely to have fewer resources and be able to offer opportunities to their learners.
- Respondents stressed that during the detailed development stage of the model, a great deal of work will be required to develop approaches to address these potential inequities and inequalities.
- Calls were also received to ensure the model recognises and supports Gaelic Medium Education in all aspects of the Diploma.

2.3. Digital Exclusion

Digital Exclusion for those experiencing poverty has been highlighted in the Fairer Scotland Duty Impact Assessment. This is, of course, equally relevant to deprivation in island communities. As in some mainland rural areas, islands can also experience infrastructure challenges such as poor or slow connectivity.

In terms of achieving the National Outcome of “We are well educated, skilled and able to contribute to society” it is argued that tackling digital exclusion can improve the ability to take part in online learning activities (particularly seen during local

school closures from Covid-19 outbreaks) but also that digital exclusion exacerbates students existing experience of exclusion and inequality⁸.

The Scottish Government's Connecting Scotland programme takes a targeted approach to redressing this balance; providing support and devices to those most in need. The programme has delivered on its target of getting 60,000 digitally excluded households online in the first 3 phases, distributing devices, and internet access for 2 years, via more than 1,000 organisations⁹. Notwithstanding this investment, there is still a disparity between the digital access between the most and least affluent households.

There is significant variability in digital access and digital approaches across the 355 secondary schools in Scotland. This brings an element of geographic inequality which intersects with other forms of digital inequality and would represent a challenge if the recommendations were implemented at pace.

2.4. Stakeholder Feedback Following Publication of the Final Report

Professor Hayward sought to address some of the concerns raised during the three phases of the review in her final report, so it is worth considering the feedback received since the final publication :

In regard to island communities, points made include:

- There is much to be gained from the focusing of young people's minds on key issues and ideas which are relevant or of interest to them, whether global or local. The local, highly individual communities and cultures often found in the remote or island settings typical of Argyll and Bute can benefit greatly from young people's focused attention on their unique dynamics, issues and questions.
- Argyll and Bute Council agreed that the assessment and qualifications system should be central to eradicating the poverty-related attainment gap, and should allow the achievements of all young people to be recognised and valued in an environment where established preconceptions about the relative value of different qualifications no longer pertain. For the system to achieve such, it is fully agreed that the assessment and qualifications system must have a high degree of flexibility, with the related requirement for it to be personalised through a wide range of attainment and achievement pathways. This is of particular significance to Argyll and Bute Council, where the small, remote and rural nature of many of our schools mean that this breadth and flexibility of curricular choice is not always as available as it is in larger settings closer to centres of population.

In regard to Gaelic and Gaelic Medium Education (GME):

- GME subject specialist representatives were very supportive of the Independent Review's recommendations and considered there to be potential

⁸ [Connecting Scotland: phase 1 evaluation, Annex C](#)

⁹ [Connecting Scotland: phase 1 evaluation](#)

opportunities within each of the SDA's three proposed elements. There were also concerns about the additional workload that may be put on Gaelic specialist teachers.

- For GME they cited issues for curriculum and qualifications meeting the needs of the community - both in terms of content which reflects their experiences and values the fields of work for rural employment and skills.
- There is scope for the Diploma to redress issues for pupils who have gone through GME or have fluent Gaelic at home being encouraged and supported to gain a recognition or formal qualification of their Gaelic skills.
- Overall stakeholders recognised advantages to Scottish Education that the SDA could deliver for learners. They said that it would be crucial that there was a clear understanding from the outset that Scotland provides Secondary Education in two languages, either through the medium of English or GME. The SDA offers several opportunities to address challenges arising for the GME system. The National Gaelic Language Plan 2023-28 and Local Authority Gaelic Language Plans will be important mechanisms for delivering faster progress in this area. Overall stakeholders were in agreement and welcomed the inclusion of specific reference to GME (including relating to digital profiling).
- In GME there are good experiences available in schools, but currently this is not being captured (music specialists etc) the SDA provides an opportunity to formalise this. But there is an equality and equity issue here and a risk that if the opportunities aren't available in GME, young people might disengage. Agree with the recommendation that all parts of the SDA are available in Gaelic.

In regard to digital inclusion stakeholders told us:

- The final report does not address geographical inequalities, especially around equitable provision for colleges (for example) and the challenges of providing increased breadth and depth in the Senior Phase (e.g. small rural schools / travel to other providers / cost and time of transport etc). Acknowledging that whilst solutions can be digital in nature, there needs to be considerable investment in the digital infrastructure in rural locations in order to make this a reality for our young people.
- A minimum entitlement to digital access would be helpful.
- Despite the challenges, delivering virtual learning for young people alongside mainland classes could be positive in terms of broadening choice in the Senior Phase.

In regard to elements of the Diploma:

- There remains a risk that young people living in more deprived and rural areas may have less opportunity to be involved in activities that would contribute to the Personal Pathway element whereas others would have more opportunity to be involved in this. Making this an entitlement would help but would require a clear definition of what this means and appropriate funding and guidance to allow it to happen.
- The Personal Pathway has the potential to deliver new opportunities for the GME system, for example: Using experiences through Gaelic within the Duke of Edinburgh Award, Prince's Trust, John Muir Award, SSERC, and Caritas

Award etc. However further work will be required to ensure that the award schemes have Gaelic language materials and advice.

- If Project Learning is implemented in a way that ensures that resource, support and structures that are put in place ensure Gaelic is included as a method and medium of delivery for this element then it could have positive impact on the engagement of pupils in their community and, if delivered digitally, with other GME pupils nationally. Overall project learning could be positive for GME.

Clearly island communities will also share positive and negative views with other stakeholders across Scotland. One of the frequently cited concerns is around teacher workload and this could be felt more keenly where challenges in teacher recruitment in rural and island communities already exist.

Section 3 – Assessment and Improvement

None of the recommendations, individually or collectively, would be ruled out for reasons of island community concerns. Relevant stakeholders are generally supportive and have flagged positive opportunities offered by the recommendations.

Section 4 – Decision

In making decisions relating to this Island Communities Assessment the inputs of stakeholders, including relevant communities, have been considered. This highlighted that there are areas of concern that relate to geographical limitations on opportunity (including the time and cost of travel), digital connectivity and Gaelic Medium Education.

No changes will be made to the response as a result of the assessment. The response is not deemed to be intrinsically detrimental to the Island Communities.

Steps will need to be taken to ensure that the existing factors which negatively impact on young people's attainment in education in the current system are reduced or, at least, not made worse. This may include directing further Island Communities Impact Assessments if required.

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