

# **EIS-FELA Submission on College Regionalisation Inquiry: Post-inquiry Scrutiny**

**March 2025**

EIS-FELA welcomes the opportunity to provide further feedback and information following the publication of the College Regionalisation Inquiry ahead of parliamentary scrutiny over the Tertiary Education and Training (Funding and Governance) (Scotland) Bill.

## **Purpose of colleges**

EIS-FELA agrees wholeheartedly with the 2023 report from [Scottish Government on Purpose and Principles for Post-School Education](#) stating “Colleges fulfil multiple purposes, delivering education and training to people of different ages, abilities and ambitions. This includes the delivery of professional development through upskilling and re-training, to ensure that people can continue to learn, develop within an industry or pivot to another. It also includes the vital objective of providing more vulnerable people with opportunities to develop skills to learn, to live and to work.”

EIS-FELA agrees with Colleges Scotland and Audit Scotland in their call for the Scottish Government to provide clear strategic direction to colleges in so far as saying the FE offer should be in line with national priorities including the wellbeing agenda, human rights and environmental justice. EIS-FELA believes that colleges are far more than training grounds for the needs of business and other employers; they are autonomous seats of learning and should not be purely vocational training grounds. Where colleges do work with businesses on a skills offer, that work should complement students’ priorities and national priorities around wellbeing or environmental justice. A democratic national industrial strategy may be required to bolster key sections of the economy for the present and future but that should not preclude colleges making decisions locally and an emphasis should be placed on having a near-universal educational offer regardless of where a prospective student lives in Scotland.

The model of a further education college is different to that of a university. Whilst FE colleges provide higher education in the form of certain qualifications and certainly provide a pathway to higher education institutions as well as vocational qualifications, they are distinct entities in a tertiary landscape with their own role, history and culture. FE colleges, and the staff within them, are attuned to the demographics of their learners and their local communities. Factoring in local socio-economic concerns, ensuring provision to assist those whose first language is not English to achieve any level of competence in the English language, and providing support for those with additional support needs when accessing education are all statutory functions of further education colleges.

EIS-FELA agrees with the overall thrust of the publication [Colleges – Anchor Institutions Fuelling Scotland’s Economic Success](#) in that there is also already enshrined a legislative duty of colleges to “exercise its functions with a view to securing the coherent provision of a high quality of fundable further education and fundable higher education in the locality of the regional college” per section 23A of the Further and Higher Education (Scotland) Act 2005. As such, this makes colleges anchor institutions in their localities. However, EIS-FELA fail to see how “promot(ing) Scotland’s colleges internationally, strengthening our global reputation for excellence and fostering connections, particularly with the global Scottish community” furthers colleges’ intentions of being anchor institutions within their local communities or regions.

Issues identified in the [Scottish Government on Purpose and Principles for Post-School Education](#) highlight that migration, technology and AI, public health concerns, reliance on SMEs (often sole traders) and fewer middle skilled jobs compared to high and low-skilled jobs, a demand in wholesale and retail trade, car mechanics and human health and social work are all the target areas for the future of post-school education. It is in those areas colleges should focus on being anchor institutions, not on international commercial contracts.

For example, there is a care crisis in Scotland. The Scottish Trades Union Congress has highlighted this in numerous pieces of work including [Profiting from Care](#). Development of a national workforce plan is necessary to overcome this crisis. Colleges are in a unique position to provide enhanced training and career progression opportunities for social care workers, and they could be provided with targeted funding to do so. The same can be said for environmental jobs, technology and AI, or wholesale.

The College sector is in the position of being able to train and retrain workers from the public sector as well as private sector. Colleges need to be balanced providers of education and training; balancing the needs of learners, local communities and local employers.

NUS Scotland’s [Roadmap to a New Education System, June 2024](#) claims “the marketisation of education has resulted in an increasingly unstable sector” and EIS-FELA would agree. Ensuring that further education colleges have a particular role to play in the tertiary landscape, not in competition with other fundable bodies or providers, with a purpose which ensures contribution to the local community, learners, and overall national priorities is absolutely required.

### **Aims of regionalisation**

A key goal of regionalisation was to create “colleges of scale” to secure “coherent, relevant provision on a sustainable basis, including access-level and advanced and specialist provision”.

Ultimately the outcome of regionalisation was rationalisation i.e. to deliver fewer colleges, scale back on the college estate, and reduce course provision at a very local level. EIS-FELA's position has always been that there was very limited to zero educational, pedagogical or andragogical evidence to support regionalisation – despite the claims made by the Scottish Government and merging colleges at the time.

Previous evidence from EIS-FELA to the inquiry was that *“in the case of local delivery, regionalisation in some cases had the effect of regionalising the courses available to further education students. Where a larger regional college replaced what had once been several smaller, more localised, institutions, courses may have been taken out of local communities. This has clear implications in terms of equity of access and can impact adversely on part-time students and those who may not have the means to afford the travel to a campus further away than the one most local to them.”* According to [SFC's 2023-24 College Statistics](#), since 2014/15 FTE places have decreased by 11%, with sharper decrease in more recent years. Student numbers have fallen by 4%. Whilst there may be a variety of reasons for this, including that student numbers in universities have increased, the period of regionalisation has rationalised (reduced) the student numbers in FE thereby creating a more competitive funding environment for Scotland's colleges. As indicated above, FE colleges have a distinct role to play – cutting across a variety of socio-economic and cultural landscapes in Scotland - and should not be made to compete for funding with universities, especially whilst they continue to exceed delivery targets.

We now have confirmation that the Lanarkshire and Glasgow Regional Boards will be dissolved with each college being a regional college funded directly by SFC. However, EIS-FELA are concerned that this will not necessarily impact equity of access if, for example, Glasgow Clyde cuts courses in social sciences whilst Glasgow Kelvin begins to offer more. Whilst not every college can offer the same provision there must be clear and strategic direction from the Scottish Government, or via SFC, that the needs of the local community are first and foremost.

At the same time as the dissolution of the Glasgow and Lanarkshire Regional Boards there is a consultation open across UHI on the future operating model where one option is to merge all partner colleges. EIS-FELA previously reported to the inquiry that *“the funding control of regional delivery of learning of further education colleges in the Highlands and Islands is exercised by the Court of the University of the Highlands and Islands (UHI). This funding arrangement has slowly starved some further education colleges in the region and effectively replaced further education services with higher education provision ethos that is further removed from the specific needs of local communities.”* EIS-FELA are concerned that further merger of assigned colleges across UHI, which spans more than half of Scotland's land mass, will simply embed these issues as the regional funding body – that is the University of the Highlands and Islands - amasses more influence. EIS-FELA members are

already raising concerns about a continued drive towards online teaching and learning – at the expense of face-to-face teaching and learning; colleges becoming specialist in particular curricular areas at the expense of redundancies in another college; and further disproportionate impact on rural communities. EIS-FELA members in UHI North, West and Hebrides and UHI Shetland have raised concerns over the reluctance to carry out, and subsequent lack of rigour, in the islands impact assessments during merger and redundancies processes and it is difficult to envisage how such extended regionalisation with the subsummation of FE provision into HE provision could successfully input into the Scottish Government's Rural Delivery Plan

The [SFC's 2022-23 College Staffing Statistics](#) showed that lecturers' numbers were more or less stable since 2014-15. However, we know that FE workforce was down 7% across 2023/24 and we await the 2023-24 College Staffing Statistics and Q1 of 2025 public sector workforce statistics to see the full effect of lecturers' redundancies. As such, it would appear that mergers and regionalisation have facilitated a huge drop in lecturing staff.

### **Financial sustainability**

EIS-FELA notes another 0.33% cut for the 2025-26 FE budget in real terms outlined in the [Further Education \(FE\) and Higher Education \(HE\) Budget 2025-26 – SPICe Spotlight | Solas air SPICe](#).

EIS-FELA's concerns over financial sustainability are two-fold. Firstly, EIS-FELA recognises college funding has already been reduced by 17% in real terms between 2021/22 and 2024/25, as evidenced by Audit Scotland, and this has an impact on FE delivery as highlighted in SFC's 2023-24 College Statistics. EIS-FELA believes, as outlined above, that further education colleges require distinct, and increased, funding to fulfil their legislative and democratic role in Scotland and should not be in competition with other post-16 fundable bodies.

Secondly, EIS-FELA branches around the country have consistently raised concerns with their senior management teams and Boards in terms of scrutiny of the funds which they do receive. EIS-FELA has raised concerns over Principals' high pay packets and the use of funds which do not appear to fulfil statutory functions (e.g. improving economic and social wellbeing and cohesion of the local community) such as international trade missions. This concern is likely to be furthered by the inquiry recommendation that all 'flexibilities' must be given to colleges in terms of securing finances.

Colleges Scotland have previously requested the ability to borrow and hold reserves, reinvest surpluses, and change the rules to allow carry forward of monies between years, which will assist colleges in raising additional commercial income, including from international activity. The reality is that some colleges do re-invest surpluses and money is being diverted to subsidiary companies, staffed by college employees,

which generate more commercial activity including the buying and selling of goods and international activities. EIS-FELA recognise that some of this work may provide an income stream but there seems to have been no analysis of the net income after expenditure on generation of those income streams; or on how the income raised directly contributes to the outcomes of the colleges.

EIS-FELA is also concerned by a growing number of agencies and independent training providers (ITPs) who are competing for contracts, particularly around work-based learning and provision for additional support needs, with further education colleges. Whilst the definition of 'further education' given in the Further and Higher Education (Scotland) Act 1992, section 6, specifically mandates for providing for those with additional support needs and assisting those whose first language is not English; where there have been significant cuts to ASN and ESOL provision, previously highlighted by EIS-FELA, the new Tertiary Education and Training (Funding and Governance) (Scotland) Bill may further allow for a growing market in ITPs plugging these gaps, which further compete with colleges' funding streams.

There is one pot of public money being shared amongst a tertiary landscape and that money should not be subject to competition between statutory bodies with skilled and regulated workforces and private un-regulated providers, which may be an unintended consequence of the Tertiary Education and Training (Funding and Governance) Bill.

## **Governance**

EIS-FELA raised, during the inquiry, the issue of governance across the sector but this has not been addressed in the report. In evidence, EIS-FELA stated "it is apparent that, across the sector, college principals can and do exercise a disproportionate level of decision making power, without adequate levels of scrutiny or accountability from the boards of management in their college." The decision to grant more, concentrated, powers to the SFC as the sole funding body for post-16 education may embed this further. Whilst it appears that there will be new requirements in terms of the make-up of the SFC Board, it has, historically, always had a number of Principals and Chairs of Boards of Management from the colleges and universities funded. This can lead to a lack of transparency and accountability.

EIS-FELA would note there have been some teething issues in terms of trade union seats on colleges Boards of Management, following implementation of the legislative requirement, although these are being ironed out.

EIS-FELA would like to see more involvement of trade union reps in terms of decision-making processes around capital investment strategies, further regionalisation, and scrutiny over income generation and are disappointed there is no mandated Trade Union seat/s on the SFC Board per the Tertiary Education and Training (Funding and Governance) Bill. EIS-FELA also believes a public service

ethos needs to be re-established, with strict management salaries, expense rules, and an openness to scrutiny.

### **Industrial relations**

There remain concerns over staff wellbeing and morale at many colleges and the sector is clearly in a turbulent industrial relations landscape. There has been significant industrial action in the period after college regionalisation, but the period has also delivered a harmonised pay and grading structure for all lecturing staff as well as national conditions of service – all agreed at the NJNC<sup>1</sup>. Since the inquiry completed, College Employers Scotland and EIS-FELA agreed a four year pay deal (2022/23-2025/26) in September 2024.

This has allowed outstanding work at NJNC to progress. For example, work has been re-started on agreeing Terms of Reference on Fair Work, on disciplinary and grievance policies, a Covid Circular and on reviewing the NRPA.

Outstanding implementation issues around transfer to permanent contracts, the use of instructor/assessors or agency staff instead of lecturers within the national bargaining framework, a reduction in class contact hours with an increased number of classes to teach and less preparation time and outsourcing of ASL all contribute to a continued sense of precarity in the sector.

EIS-FELA do agree with Colleges Scotland in their [Colleges – Anchor Institutions Fuelling Scotland’s Economic Success](#) publication that we need to build a “culture of trust and collaboration between college leaders, public agencies, and stakeholders” but that practitioners’ voices require to be valued as part of building that culture of trust.

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<sup>1</sup> A full set of NJNC Agreement may be found here: <https://njncscotlandscollages.ac.uk/agreements-guidance>