

**The General Teaching Council for Scotland
Memorandum on Entry Requirements to Courses of Initial
Teacher Education
Guidelines for Courses of Initial Teacher Education in
Scotland
17 May 2013**

1. The NASUWT welcomes the opportunity to further comment on the Memorandum on Entry Requirements to Courses of Initial Teacher Education in Scotland and the Guidelines for Courses of Initial Teacher Education in Scotland.
2. The NASUWT is the largest teachers' union in the UK and the fastest growing teachers' union in Scotland.

GENERAL COMMENTS

3. The NASUWT notes that it remains the General Teaching Council for Scotland's (GTCS's) intention to ratify the new versions before the GTCS Council on 12 June 2013, with the revised guidelines being used for all programme accreditations after that date and the revised entry memorandum being used to consider applications for Initial Teacher Education (ITE) from August 2013. The NASUWT would like to reiterate its

concerns regarding the very tight timescale for both the review and the implementation, and strongly recommends that the GTCS delay any proposed implementation until at least the 2014/15 academic year to enable a full equality audit to be undertaken, and to assist ITE providers in timetabling and planning relevant courses.

SPECIFIC COMMENTS

MEMORANDUM ON ENTRY REQUIREMENTS TO COURSES OF INITIAL TEACHER EDUCATION IN SCOTLAND

Section 1: Introduction

4. The NASUWT is pleased to note the addition of the phrase '*Application processes must meet all Equalities Legislation requirements*' but believes that the GTCS should go further than simply referencing equalities. The GTCS is specifically referred to in Part 3 of Schedule 19 of the 2010 Equality Act and is therefore subject to the Public Sector Equality Duty (PSED). Consequently the GTCS must, *inter alia*, in the exercise of its functions, have due regard for the need to advance equality of opportunity between people who share a protected characteristic and those who do not. Applicants who have a protected characteristic and are considering entering the teaching profession should feel encouraged to do so and feel that the profession is welcoming of diversity, rather than simply meeting minimum statutory requirements.

Section 2: General Information on Qualifications

5. The NASUWT previously has stressed that any entry requirement must ensure that those applicants with extenuating circumstances, those who have had fewer life chances, or those who require reasonable adjustments to be made on the grounds of their disability, are not excluded. It is disappointing that such access issues, which should be examined at the

point of entry to ITE to ensure discriminatory practices are avoided, have not been referenced in the amended document.

6. The NASUWT reiterates its recommendation that, *inter alia*, an equality impact assessment is undertaken to review the amended entry system. Full consideration must be given to the impact any policy change will have on people who share a protected characteristic in order to demonstrate compliance with the equality duties. Some students may encounter difficulties in achieving the qualifications and arguably the focus of higher education institutes (HEIs) should be on the students' potential, which should involve some flexibility regarding qualifications, support for trainee teachers during their studies, and continuing professional development (CPD) for fully qualified teachers throughout their career.
7. The NASUWT notes within this section that reference is made to Teaching Scotland's Future as well as the revised standards through phrases such as '*agents of change rather than recipients of it*'. The key document to inform the memorandum on entry requirements must be the GTCS standards. Should reference to Donaldson be made, it must be clear to the applicant that this is taken from a review of teacher education, as opposed to the GTCS standards which are the benchmark for entry to the teaching profession.

Section 3: Registration with the GTCS

8. The amended document sets out clearly that it is upon application for provisional registration with the GTCS that a candidate's Fitness to Teach will be considered. The NASUWT agrees it is important that applicants have an awareness of this fact and further recommends that a link is added to signpost the reader to the GTCS leaflet *Convictions and Registration with the GTCS*.

Section 4: The Teaching Qualification (Primary Education)

9. It is stated that *'in line with the Scottish Government Languages Working Group report Language Learning in Scotland A 1+2 Approach (2012) all students undertaking a programme leading to a teaching qualification for Primary education must have attained a languages qualification at Higher level or equivalent (SCQF level 6) either on entering the programme of initial teacher education or on its completion'*. It is important that all HEIs are enabling students to attain a language qualification during ITE, to avoid a geographical variation in a students' ability to access teacher training. The NASUWT is calling for a requirement to be placed on HEIs to set out clear plans detailing how this aim will be achieved in practice. It is important to ensure that potentially excellent teachers are not prevented from entering the profession where HEIs do not have the correct infrastructure in place to enable students to reach SCQF 6 during ITE.
10. The NASUWT further notes that the GTCS has signalled its intention to consider making this a mandatory pre-entry requirement from a future date and would stress the importance of further engagement and consultation with stakeholders, including the NASUWT, prior to any such decision being made.

Section 5: The Teaching Qualification (Secondary Education)

11. The NASUWT welcomes the addition of the following statement: *'as well as teaching their own subject (or subjects) it is expected that registered teachers will contribute as appropriate to the teaching of interdisciplinary learning'*. It is important to recognise the changing dynamic of interdisciplinary teaching, which has been heralded by a Curriculum for Excellence (CfE).
12. In relation to the creation of additional teaching qualifications, as is being proposed for Psychology and Dance, the NASUWT recommends that a protocol or formula is established to ensure that only those which are

necessary are added and can in the future be added in to the existing subject list. It is important not to raise expectations of applicants where there is no prospect of work after graduation. Workforce planning issues should be taken into account when reviewing the current rules.

Section 6: Secondary Subjects with Specific Requirements

13. Under 'Modern Foreign Languages', it states: *'the applicant's academic study must include an element which will allow them to contribute to the wider aspects of programmes of study in schools, such as literature, cultural studies, area studies or languages in work'*. Such a statement, if cited under languages, should also be reflected and specifically listed under other subjects. With the advent of CfE, a broader and more flexible approach to teacher education is required which will identify and thereafter foster the skills and breadth of knowledge needed in the modern classroom.

14. While explicitly stating that universities must check residency periods have been met prior to admission to ITE to ensure transparency for applicants, unfortunately, it cannot mitigate against the significant and disproportionate effect this requirement has on those with family or carer commitments. The NASUWT is disappointed that more flexibility has not been included within the memorandum, as previously requested.

GUIDELINES FOR COURSES OF INITIAL TEACHER EDUCATION IN SCOTLAND

Section 1: Introduction

15. It is stated that *'these guidelines set out the GTCS policy on the content, nature and duration of programmes leading to teaching qualifications...'*. The word 'policy' needs to be changed as this does not make it clear whether this document sets out aims or expectations. The document

needs to be easily understood and clear, not only for those applying to ITE and those administering the courses, but also to the general public.

Section 2: Conditions for the Accreditation of All Programmes of Initial Teacher Education

16. The NASUWT is not clear why the phrase '*as a general rule*' was a necessary addition to the statement '*the GTCS will only accredit those programmes of ITE which meet the following conditions*', particularly when a caveat is added in Section 3: '*this does not preclude the development of other types of provision and universities are free to discuss alternative proposals with the GTCS.*'

Section 3: Requirements for Programmes

17. Please note the NASUWT's comments under Section 2 on the memorandum (see paragraph 7 above) on the importance of distinguishing GTCS standard requirements and comments from Donaldson. Furthermore, the request that they '*show they are capable of being accountable*' is not clear and would benefit from further explanation.

18. Where it states '*student teachers should only be admitted to a programme after an interview process which should normally involve personnel from both the university and education authorities/schools*', the NASUWT recommends that it is added that the ultimate responsibility for choosing students lies with the university. The NASUWT would like to reiterate its view that there is not currently a difficulty in HEIs selecting excellent students. The NASUWT firmly denies that the opinions of employers should be binding or that their views should be given precedence over those of HEIs. Selection for a teacher training course which is based upon potential and is fundamentally different to the selection processes

employers are accustomed to, whereby they are seeking teachers with existing skills and knowledge. HEIs have the appropriate experience and expertise to be best placed to identify suitable candidates for their course. Employers in turn have more than sufficient opportunity to screen employees, who have graduated and are qualified teachers, at the point of application for employment. The guidelines should allow HEIs the freedom to use their skills and knowledge to select the best candidates for their courses.

19. It states *'programmes must...meet all equalities legislation requirements and allow the opportunity for such reasonable adjustments as may be required to be offered.'* The NASUWT is pleased that references to equalities have been added, however, the statement quoted could go much further: please see the comments under Section 1 on the memorandum (see paragraph 4 above). Furthermore, the GTCS should seek to continue to consult directly with students and trainee teachers who have a protected characteristic under the Equality Act 2010.

20. Where it is stated under Section 3.2 that *'programmes must contain appropriate elements of study, including in-depth academic study in areas beyond education, to allow student teachers to extend and deepen their knowledge, understanding and experience in order to meet the Standard for Provisional Registration'*, it would be helpful to provide a few examples whilst stating these are illustrative not exhaustive.

21. It is stated that when undertaking a concurrent degree *'on graduation, student teachers have an area of specialism within the primary curriculum.'* It would be helpful if an explanation of what is meant by "an area of specialism" was provided.

22. In relation to the PGDE Primary programme, it states that it *'should enable student teachers to build on relevant elements of their original degree programme for use in primary schools.'* While some qualifications, such

as a Foreign Language or science degree, might have an obvious link or tie in to the implementation of national commitments, other degree courses such as Law or Psychology do not have such a clear link. The NASUWT believes, therefore, that this Section would benefit from further clarification or explanation.

23. It is stated that *'programmes must...also raise student teachers' awareness of secondary teachers' wider roles in schools beyond subject teaching, through contributing to the ethos of the school and to interdisciplinary learning'*. It is equally important that primary teachers are able to contribute to the ethos of the school through whole-school learning.

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