

**Disclosure (Scotland) Act 2010 – Accredited Body Fees and  
Proposals for Discounting – PVG Scheme Consultation**

**28 May 2024**

NASUWT is the Teachers' Union, representing teachers and school leaders in all sectors of education and across all 32 local authorities in Scotland.

While welcoming the above consultation, NASUWT is concerned that the current framing of the consultation inhibits genuine discussion and debate around inter alia the financial impact of changes on teachers in Scotland.

**FINANCIAL CONTEXT**

The soaring rate of inflation has featured prominently in the news since 2021. The significant increase in prices, for food and energy in particular, has pushed many UK households into poverty and reliance on foodbanks as the cost-of-living crisis deepens. Teachers in Scotland have been subject to below-RPI inflation pay awards in ten out of the last 14 years. When taken in the context of crippling cost-of-living increases, this has plunged many teachers into serious financial hardship. In April 2023, the majority of classroom teachers' salaries in Scotland were worth almost one fifth (19.5%) less in real-terms than if their pay had increased to match RPI inflation in each year since 2010.

The Donaldson Report (2011) succinctly set out the requisite factors for an efficient and effective education system:

*'The foundations of a successful education system lie in ensuring an appropriate supply of high quality teachers covering geographical areas, education sectors and curriculum specialisms... It needs teaching to be seen as an attractive option for well-qualified individuals who have a commitment to young people and their learning. It also requires good, flexible workforce planning and careful selection of students into initial teacher education courses.'*

Teachers provide one of the most important of our public services. The work they do sets the foundations for those who become our doctors, nurses, accountants, engineers and indeed all workers who make such vital contributions to our public and private sectors. Teachers change lives and build nations. A successful education system, supporting these critical outcomes, cannot be achieved without the firm foundation of an efficient and effective workforce.

Teachers are providing an essential public service, have been adversely impacted by the cost of living crisis and government fiscal policies and now are to be further adversely impacted by proposed increases in both the cost and frequency of disclosure requirements. There has been no explanation as to the reason for this increased cost, other than the passage of time, and without further explanation this will be exceedingly difficult for our members to accept.

## **INSECURE WORK**

Increased costs will be felt by those in insecure work and within teaching this means supply teachers and those on temporary contracts.

Supply teachers are integral to the education system. Without supply teachers, many pupils would be denied the opportunity to be taught by hard-working and dedicated teachers who ensure that schools can continue to provide the education to which children and young people are entitled. Supply teachers make a vital contribution to securing high educational standards for all children and young people.

NASUWT's annual survey of supply teachers in Scotland aims to examine the changing experiences of supply teachers, including issues and trends. The 2022/23 survey was undertaken during June and this uncovered the following:

During the academic year 2022/23, over three-quarters of supply teachers (77%) reported that they were working for one local authority, 17% reported that they were working for two local authorities and 3% reported that they were working for three local authorities. Three per cent of supply teachers reported that they were working for more than five local authorities.

A quarter of supply teachers (25%) reported having to claim some form of state benefit during the academic year (e.g. Universal Credit) and over two-fifths of respondents (43%) stated that they had experienced financial hardship as a supply teacher over the same period.

NASUWT's casework, organising and research indicates that teachers with protected characteristics have a disproportionately high presence in the supply and substitute teacher cohort.

There are, therefore, concerns that increased costs and any associated bureaucracy will result in further disparities in treatment as well as impacting disproportionately on women, Black and minority ethnic (BME) groups and disabled teachers, who are more likely to be employed as supply teachers and therefore employed on a short term basis across multiple local authority employers.

## **DIGITAL POVERTY**

Technological advancement requires an infrastructure including laptops and broadband. Teachers have reported difficulties to us in accessing the internet both at school and at home, particularly in rural areas where there are often issues of hidden poverty and unreliable mobile data and broadband. Indeed, this is indicative of a wider systemic central-belt assumption where policy initiatives are often created without considering the impact on rural areas.

Delivering a digital scheme which will eliminate the need for paper certificates, enabling people and organisations to apply for and receive disclosures online does not automatically provide an inclusive service. NASUWT Scotland Conference 2024 highlighted the need for Scotland to support a more diverse teaching profession, which inter alia includes those with lived experience of poverty. Increased costs will be assumed to be there to pay for a digital system, which will be particularly frustrating for members where this creates barriers and may not meet their needs.

### **COLLABORATION**

There will undoubtedly be significant logistical and system process issues for the GTCS in adopting changes. Any increase in workload for the GTCS might result in a double cost increase for teachers of both GTCS registration alongside any Disclosure Scotland fee increases. There is currently insufficient detail available on the proposals in order to assess how this will impact our members. Further urgent consultation needs to take place with teachers, teaching unions and the GTCS as the 5 year time limited model is being established.

Implementation of any change within education will be technical, will impact substantial numbers of teachers and organisations, including the GTCS, and Disclosure Scotland needs to engage on a sectoral basis with the education sector to inform any changes of process (including any discussion on imposing conditions), design and costs as a matter of urgency.

For further information, please contact:

[nasuwt@mail.nasuwt.org.uk](mailto:nasuwt@mail.nasuwt.org.uk)

[www.nasuwt.org.uk](http://www.nasuwt.org.uk)

Dr Patrick Roach

**General Secretary**