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Dear Pauline

I am writing with reference to the Draft Strategic Plan 2023-2028 which is currently open for consultation.

The NASUWT broadly welcomes the strategic themes of trust and impact, but is concerned that insufficient actions have been cited in order to embed impact within the General Teaching Council for Scotland (GTCS) organisational ethos. Implicit within 'impact' is research, reflection and audit: processes which will be familiar to many registrants currently maintaining their registration with the GTCS via Professional Update, and Professional Review and Development. The objectives under the strategic themes fall short of modelling that reflective practice to the profession. The Union would wish to see greater specificity around engagement and impact assessment, and indeed, as part of that process of collaboration, trade union voices explicitly embedded within the GTCS' engagement and consultation protocols.

The Union warmly welcomes a commitment to focus on core functions, a prerequisite to maintain trust and confidence from the profession. We would, however, welcome further details around the objective to '*provide improved access to resources designed to encourage learning and wellbeing*' as, depending on how this is framed in reality, there may be an unhappy crossover between the role of Education Scotland, and its replacement, and the role of the GTCS. Certainly, the NASUWT has previously expressed concerns where guidance on the GTCS website is badged 'GTCS' yet has been drafted by Education Scotland: collaboration cannot mean wholesale adoption of guidance produced entirely by a third party.

What is missing from the draft strategic plan, following on from the statement that the GTCS is self-regulating, is an explicit acknowledgement that to be self-regulating the

GTCS must ensure it reflects the profession. The GTCS must seek to engage teachers and registrants from under-represented groups directly and give them a platform to inform policy. The voices of those under-represented groups must be amplified in order to meet the stated shared set of values, namely *'trust and respect, social justice and integrity'*. It is insufficient for the GTCS to commit to *'lead and support initiatives to improve diversity in teaching and promote teaching as a positive professional career'* where that reflective lens has not been turned on its own internal structures and staffing.

The NASUWT has repeatedly stressed to the GTCS that more must be done than reference equalities; indeed, within the draft strategic plan there is insufficient reference to actions which will embed 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. For example, 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.

It is noteworthy that when the draft strategic plan sets out that the GTCS *'role is to register and regulate'* and *'what this looks like for teachers and college lecturers changes throughout their career and context'*, it fails to acknowledge the non-linear journey many teachers experience in their career. For example, teachers returning from a career break as a result of family-caring responsibilities, such as childrearing, will not see themselves or their journey reflected within the GTCS' narrative, yet the organisation's role in facilitating their return to teaching is critical.

Finally, it is set out in the plan that *'our principles are our values in action...these are: we care, we add value, we learn, we communicate and we collaborate'*. The NASUWT would wish to see transparency and accountability featured more strongly within the GTCS principles. To foster trust, the GTCS must ensure that both the reality and the public perception of their actions align: this is impossible without transparency and clarity around internal accountability frameworks and decision-making functions.

Many thanks

Mike Corbett

National Official (Scotland)