

GTCS

**Consultation on proposed changes to the Memorandum on
Entry Requirements to Programmes of Initial Teacher
Education in Scotland
21 March 2024**

1. NASUWT welcomes the opportunity to comment on the Memorandum on Entry Requirements to Programmes of Initial Teacher Education in Scotland.
2. NASUWT is the Teachers' Union, representing teachers and school leaders in all sectors of education.

GENERAL COMMENTS

3. In both 2013 and 2018, NASUWT was clear in our response to the review of the Memorandum on Entry Requirements to Programmes of Initial Teacher Education (ITE) in Scotland that: *'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'*. The Union is therefore very pleased to see within the new Introduction the explicit statement: *'We recognise the necessity of proactively recruiting students from diverse groups – particularly those currently underrepresented in teaching – in conjunction with Scotland's ambition to ensure a teaching profession that is reflective of our diverse communities.'*

SPECIFIC COMMENTS

Literacy and Numeracy requirements

Q1: Do you agree that there should be no change to the current literacy requirement? If not, please explain why.

Q2: Do you agree that there should be no change to the current numeracy requirement? If not, please explain why.

4. It is noted that no change to the current provision is proposed. In our 2018 response, NASUWT noted:

'It would be helpful to have access to the data on the level of qualification of successful applicants over the last five years. Many providers note that due to the high number of applicants for their programmes, many of whom have academic qualifications significantly above the minimum, not all qualified applicants make it through. Indeed, the Transforming Scotland into a maths positive nation: final report of the Making Maths Count group report set out in recommendation 6:

'The GTCS, in partnership with Initial Teacher Education Institutions, Education Scotland and local authorities, should undertake research on how well ITE students are being prepared to teach maths as newly qualified teachers. The research should include a review of:

- *Minimum entry requirements to ITE for Maths.*
- *Other means of ensuring applicants have good quality maths skills, e.g. online testing of applicants' numeracy skills.*
- *The extent to which there is sufficient coverage of maths in primary ITE programmes to allow meaningful, quality maths learning in primary schools.*
- *The means by which ITE institutions continuously update and improve their programmes and provide a practical focus on teaching and learning styles that instils teacher confidence in delivering maths.*

- *The extent to which the probationary year promotes good quality teaching and learning styles and improving confidence in maths.'*
5. NASUWT continues to recommend that further research is undertaken and robust data gathered to support future reviews.
 6. Additionally, 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 institutions (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 for fully qualified teachers throughout their career.

Sections 1 to 5

Q4: Do you agree that we should include a requirement to interview applicants? If not, please explain why.

7. NASUWT would not support a requirement to interview applicants as a mechanism through which they can demonstrate their openness to learning the skills, dispositions and attributes desirable in a teacher without an equality impact assessment having first been undertaken.
8. Mandatory interviews or site visits may disadvantage some applicants. Any policy on visits and/or interviews would need to be transparent, well-justified and consistently applied. The current information provided does not give sufficient justification to meet this test.
9. It would be important for the General Teaching Council Scotland (GTCS) to provide evidence that an interview was the most appropriate means of establishing whether candidates fit the entry requirements. A move to mandatory interviews could lead to racial bias in selection, for

example, whether by confirmation bias, racism, stereotyping or indeed the experience or fear of being stereotyped, all of which might undermine a Black applicant's ability to perform. Equally, some candidates may find it difficult to process questions and formulate a response at speed and this may disproportionately impact neurodivergent applicants. In the absence of an equality impact assessment, it is not clear that these impacts have been considered, and NASUWT would recommend this requirement is removed pending further and better consultation.

10. NASUWT recommends that it is also added that the ultimate responsibility for choosing students lies with the HEI and would like to reiterate its view that there is not currently any difficulty in HEIs selecting excellent students. The guidelines should allow HEIs the freedom to use their skills and knowledge to select the best candidates for their courses.

Q5: Do you agree that the refinements we have made to the skills, dispositions and attributes in this section better reflect expectations at the point of application for prospective student teachers? If not, please explain why.

11. While acknowledging that 'resilient' formed part of the skills, attributes and dispositions desirable on the Memorandum previously, NASUWT believes that further reflection is required on its inclusion on the amended Memorandum.

12. NASUWT's most recent Wellbeing Survey showed that 95% of women teachers and 89% of male teachers said their job impacted their mental health and 68%/58% their physical health.

13. Asking teachers and prospective teachers to be resilient is placing the onus on them to resolve systemic issues by being less triggered by verbal abuse or assault, unreasonable workload or adverse management practices.

Q6: If you have any other comments on proposed changes to the Memorandum set out in points 6.1 to 6.5 in the consultation paper, please include them here.

14. NASUWT supports the move to reference the Scottish Credit and Qualifications Framework (SCQF) throughout, as well as the clarification that HEIs can accept credits from either undergraduate or postgraduate qualifications.

Secondary Subjects with Specific Requirements

Q7: Do you agree that the changes we have made to the entry requirements for the bullet point list of subjects in 6.6 make the provisions easier to understand and apply? If you do not agree, please explain why.

15. NASUWT has no objection in principle to the suggested changes.

Q8: Do you agree with the proposed changes to the entry requirements for Art and Design? If not, please explain why.

16. NASUWT has no objection in principle to the suggested changes but it is important that monitoring takes place to assess its impact or any unintended consequences.

Q9: Do you agree with the proposed changes to the entry requirements for Business Education? If not, please explain why.

17. While the consultation notes that a minimum of two of these subject areas is preferred, it isn't clear from the documentation that 'preferred' should lead to 'required'. The GTCS is setting minimum standards and then it will be for individual HEIs to determine whether they would prefer more.

Q10: Do you agree with the proposed changes to the entry requirements for Dance? If not, please explain why.

18. NASUWT has no objection in principle to the suggested changes.

Q11: Do you agree with the proposed changes to the entry requirements for Drama? If not, please explain why.

19. NASUWT has no objection in principle to the suggested changes.

Q12: Do you agree with the proposed changes to the entry requirements for English? If not, please explain why.

20. The recognition, inter alia, of media and the critical analysis of film in the teaching of English is welcome, and NASUWT does not oppose these amendments.

Q13: Do you agree with the proposed changes to the entry requirements for History? If not, please explain why.

21. NASUWT is in support of archaeology receiving recognition and would suggest that a full consideration of all history-related subjects, such as History of Art or History of Fashion, is undertaken at the next memorandum review.

Q14: Do you agree with the proposed changes to the entry requirements for Home Economics? If not, please explain why.

22. NASUWT has no objection in principle to the suggested changes but it is important that monitoring takes place to assess its impact or any unintended consequences.

Q15: Do you agree with the proposed changes to the entry requirements for Languages? If not, please explain why.

Q16: If you have any further comments about any of the changes we are proposing to the entry requirements for any of these subjects, please include them here.

23. The statement that '*All the languages taught in Scotland are valuable – there is no hierarchy of language*' was both very welcome and overdue.

24. Explicitly stating that residency periods must be met prior to admission to ITE will not mitigate the significant and disproportionate effect this requirement will have on those with family or carer commitments. NASUWT is disappointed that more flexibility has not been included within the Memorandum, as previously requested.

Appendices and General comments

Q17: Do you agree with the proposed changes to the table in Appendix A? If not, please explain why.

25. The table of ITE providers and programmes offered is really important to include. NASUWT agrees that while this information is subject to change, this is outweighed by the usefulness of the information, which will additionally support and facilitate future reviews.

Q18: Is there anything else you would like to mention in relation to this consultation that we haven't specifically asked about?

26. NASUWT notes that this consultation has been split into sections in order to review the changes which are deemed to be needed more urgently, and that the intention is to publish more information about the longer term review once this consultation has concluded. NASUWT would wish to continue to engage directly with the GTCS to inform this future piece of work.

For further information, please contact:

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**NASUWT
The Teachers' Union**

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