

INSPIRING WORLD-CLASS
TEACHING PROFESSIONALISM



Report on Consultation on Registration Rules

Consultation: 6 October 2021 – 5 January 2022

04 March 2022

Introduction and Methodology

1. Background to the consultation

GTC Scotland consulted to hear the views of stakeholders across Scottish education on proposed new Registration Rules to replace the current Registration and Standards Rules. The Registration Rules set out GTC Scotland's registration criteria, ongoing registration requirements and how the Register of Teachers operates. They cover initial registration (entry to the Register) as well as enhancements to registration (for example, the awards of Professional Standard for Headship and Professional Recognition).

The current Registration Rules were put in place in 2015, meaning that they are now over six years old. Over the last six years there have been many changes to Scottish education, teaching and GTC Scotland's own policy context, including the introduction of mandatory registration for teachers in the independent school sector (by 1 June 2021) and college lecturers (from September 2021) as well as a new requirement for headteachers in local authority and grant-aided schools to be awarded the Professional Standard for Headship. Brexit has also taken place, meaning the legal framework in relation to the recognition of professional qualifications between European member states is no longer in place.

Recognising all these factors, and following internal review and engagement with key stakeholders, GTC Scotland ran a 3-month public consultation to gain detailed feedback on the proposed new (and renamed) Registration Rules.

2. The consultation

The consultation raised important issues about who GTC Scotland registers on our Register of Teachers and what registration with GTC Scotland means. The consultation was therefore relevant to teachers and lecturers and employers of teachers and lecturers, but it was also relevant to learners and members of the public. The consultation was therefore open to all.

The consultation ran for 3 months via an online survey, launching on 6th October 2021 and closing on 5th January 2022. GTC Scotland provided two documents relating to this consultation:

- Current Registration and Standards Rules 2015
- New Registration Rules

3. Methodology

GTC Scotland commissioned Dr Victoria Jupp Kina from Social Research ReImagined to carry out the processing, coding and reporting of all consultation responses. Dr Jupp Kina is an experienced independent researcher specialised in public consultation and engagement.

Anyone who wished to do so could submit their responses to the consultation via an online form which was publicised on GTC Scotland's website, or where that was not possible, could contact GTC Scotland in order to submit a response in an alternative format (by email attachment).

All responses were processed and imported into Excel. In cases where responses were received via email, each part of the response was reviewed to identify how best to capture the content using the coding framework. The process of coding is discussed below.

4. Coding

Thematic coding was used to capture all open comments made across all consultation responses. The coding strategy was to read every response in full and then assign codes to sections of the text. Codes are designed to capture the meaning of the text, where all text assigned to the same code has approximately the same meaning. Codes then continue to be added until all text has been analysed.

The codes formed part of a coding framework. The coding framework used for analysis has three main categories:

- Comments expressing support for the proposal
- Suggestions about the proposal
- Comments expressing concerns about the proposal

Sub-themes are then identified to capture the sentiment of the coded text and to identify similar themes across responses.

5. Quantitative and qualitative analysis

The consultation contained 22 closed questions using a Likert scale to capture responses. Each closed question was then followed by an open question for comments. Both forms of data were analysed.

Quantitative analysis

Bar charts summarising the overall responses to the closed Likert questions are provided for each proposal. One further table is provided to break down overall responses by the following participant perspectives:

- Government organisation
- Local authority
- Student/pupil
- National educational body
- University lecturer
- College lecturer
- Local authority officer
- Education stakeholder
- Parent/carer
- Individual teacher

Qualitative analysis

In order to indicate the relative weight of the summarised qualitative comments, in other words to make it easier to understand how many respondents had expressed a particular view, the following quantifiers have been used within the summaries of the qualitative data:

- 1 respondent = referred to as 'one respondent'
- 2-10 respondents = referred to as 'a few respondents'
- 11-20 respondents = referred to as 'some respondents'
- 21+ respondents = referred to as 'many respondents'

6. Additional comments

The consultation included the opportunity to provide additional comments about the proposals and to comment on equality and diversity impacts. These responses were analysed separately. A summary of these responses is provided.

7. Participation

During the 3-month consultation period GTC Scotland received 256 responses to the online survey and one open response. The majority (160) of respondents were individual teachers. Parents/Carers formed the second largest group of respondents (23). The third largest group were Education Stakeholders (21). Of the 21 respondents in the education stakeholder category, just over half (11) of respondents were from Colleges or Universities and one quarter (5) of the respondents were from one school. Local Authority Officers were the fourth largest category with 20 respondents. 15 respondents identified as College lecturers and 7 respondents were University lecturers. Five national educational bodies responded to the consultation.

Perspective	Number of Respondents	Percentage of Total Respondents
Government organisations	1	0.39
Local authority	1	0.39
Student/pupil	3	1.17
National educational body	5	1.95
University lecturer	7	2.73
College lecturer	15	5.86
Local authority officer(s)	20	7.81
Education stakeholder	21	8.20
Parent(s)/carer(s)	23	8.98
Individual teacher	160	62.50
TOTAL	256	100.00

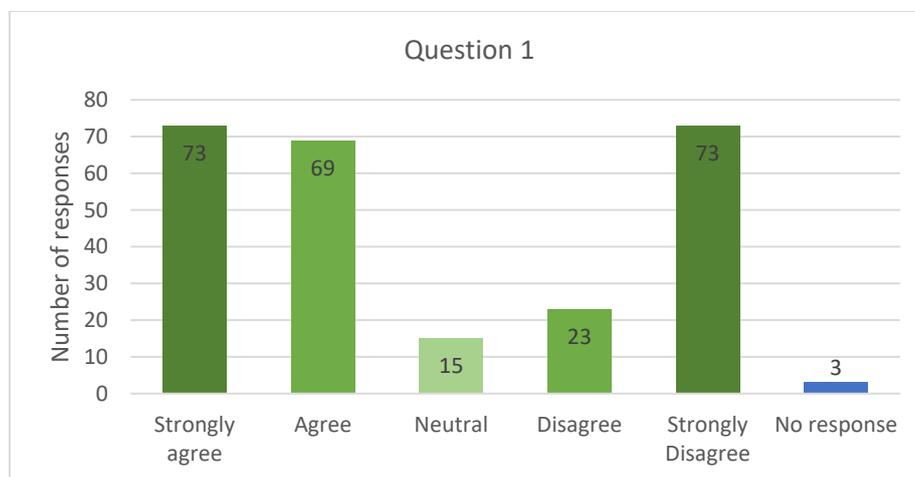
Q1: GTC Scotland propose that the Register of Teachers will consist of the following categories of registration: Primary Education; Secondary Subject Education and Further Education.

1.1 Quantitative analysis

Responses to this proposal are divided, although there is a preference in support of the proposal. The same number of respondents either Strongly Agree (73) or Strongly Disagree (73) however when categories are combined, the majority (56%) of respondents indicate that they either Strongly Agree or Agree to the proposal. Just over one third of respondents (38%) indicate that they either Strongly Disagree or Disagree.

When analysed by perspective, the groups indicating support for the proposal are local authority officers (75%), college lecturers (74%), individual teachers (65%) and university

lecturers (58%). Four of the five national educational bodies support the proposal. One educational body indicates that they strongly disagree. The other groups indicating that they disagree to the proposal are parents/carers (95%), education stakeholders (81%), students/pupils (67%), university lecturers (43%) and college lecturers (14%).



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	47%	27%	13%	7%	7%	0%
Education stakeholder	5%	5%	0%	10%	71%	10%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	33%	32%	6%	10%	19%	0%
Local authority	0%	100%	0%	0%	0%	0%
Local authority officer(s)	40%	35%	15%	5%	5%	0%
National educational body	40%	40%	0%	0%	20%	0%
Parent(s)/carer(s)	4%	0%	0%	4%	91%	0%
Student/pupil	0%	0%	0%	0%	67%	33%
University lecturer	29%	29%	0%	29%	14%	0%
Grand Total	29%	27%	6%	9%	29%	1%

1.2 Qualitative analysis

1.2.1 Comments expressing support for the proposal

The University of Edinburgh expresses support for the proposal, stating that a more streamlined approach with clear categories of registration is overall a positive proposal.

The Educational Institutional of Scotland expresses support for the proposal, stating that they agree with the proposed categories of registration subject to their comments in relation to Additional Support Needs.

Education Scotland expresses support for the proposal, provided that the proposal for additional and enhanced registration is implemented.

Bòrd na Gàidhlig supports the proposal, noting that the development of Broad General Education delivery of literacy, numeracy and health and wellbeing from Primary registered teachers could impact positively on the Gaelic-Medium Education (GME) sector. The

respondent proposes that national agencies consult together on additional national advice regarding best practice for this sector, noting that they would be happy to lead further discussions on appropriate support for the Gaelic-Medium Education sector.

One stakeholder welcomes the flexibility of coverage across sectors offered by the proposal while also noting that they would like to see the encouragement of movement between Early and Primary in order to boost the Early Years workforce.

A few respondents support the proposal, specifically that it would provide a more streamlined approach.

1.2.2 Suggestions about the proposal

Colleges Scotland, along with eight colleges, suggest that the 'Further Education' category name be changed to 'College Education'. Respondents suggest that this is a more accurate description of the category and reflects the full range of SCQF levels taught in colleges. These respondents suggest that the category name 'College Education' is more inclusive for registrants and provides consistency with the overall naming convention for the 'Primary Education' and 'Secondary Education' categories.

Education Scotland suggests that consideration be given to further recognition of early learning and childcare responsibilities, aligned with Scottish Social Services Council requirements.

Edinburgh Steiner School and Drumduan School state that in the Steiner/Waldorf model of education teachers work across the 6-14 age groups, noting the need for a registration category for teachers teaching across this age range. To address this issue, respondents suggest that either the name of the 'Primary' category be changed to 'Preparatory' or alternatively inclusion of a separate 'Preparatory Teacher' or 'Steiner Teacher' category.

A few respondents suggest either retention of the 'Named School Only' category, or creation of a 'Steiner School Only' category. These respondents suggest that this is necessary to ensure inclusion and continued operation of schools using the Steiner/Waldorf model of education. One respondent notes that a 'Steiner Schools Only' registration was agreed at meeting of the Steiner School and GTCS on 16th September 2020, providing that the teaching qualification has been gained through a university credit-rated Steiner Teacher Education Course.

A few respondents suggest retention of the 'Instructor' category. These respondents suggest that this is necessary to ensure the continued recruitment of specialist teachers, for example music and art specialists.

Some respondents suggest changing the 'Primary' category to 'ELC and Primary' to fully represent the Early Learning sector. Respondents suggest that this category would not recognise the distinctive difference in ELC provision and therefore would not fully represent people who work in stand-alone nursery settings or private sector nursery provision. Some respondents note that currently some Early Years practitioners are registered through SSSC and suggest that they hope that this option will continue to be available.

A few respondents suggest that there is a need for additional registration categories to reflect specialist certified qualifications more accurately. These respondents specifically mention Additional Support Needs (ASN), Qualified Teacher of the Hearing Impaired (QTHI) and Qualified Teacher of the Visually Impaired (QTVI).

A few respondents suggest that the registration categories discourage teachers from working across levels, for example Primary-Secondary and Secondary-Further Education, suggesting that this culture of cross-level working should be encouraged. These respondents note that this is particularly relevant for Broad General Education (BGE) and suggest inclusion of Broad General Education registration category.

Further suggestions raised by respondents include:

- a separate headship category to reflect that Primary or Secondary qualified Headteachers can lead 3-18 schools;
- the inclusion of Further Education lecturers' subject specialisms to recognise their range of experience and qualifications and ensure parity with the system for Secondary registrants;
- Higher Education lecturers who are qualified teachers should be included in registration;
- consideration be given for people entering through non-traditional routes or with other degrees, specifically mentioning medical degrees.

1.2.3 Comments expressing concern about the proposal

Stakeholder concerns

The Colleges sector, along with eight colleges, expresses concern about the name of the 'Further Education' category. These respondents state that 'Further Education' does not accurately reflect the wide range of educational levels delivered by colleges and strongly suggest that the name of this registration category be changed to 'College Education'.

The University of Edinburgh expresses concern that the framing of the categories is based on the current organisational structure of schooling and does not recognise or reflect the distinct nature of working at transition stages. The respondent suggests that the focus on subject education maintains a 'silo' approach within the secondary context, stating that this creates a structural and conceptual barrier to the development of the Curriculum for Excellence. The respondent expresses concern that this may have the unintended consequence of limiting the scope of interdisciplinary working and development of working across transition stages and Broad General Education. The respondent expresses further concern that the proposal does not recognise that many Initial Teacher Education academics working in Higher Education Institutes are not necessarily registered with GTC Scotland, noting the need to ensure appropriate registration for those who do need to register.

Both Edinburgh Steiner School and Drumduan School express concern about the proposed age designation, stating that this does not reflect the full range of diverse educational approaches available in Scotland. The respondents express concern about how implementation of the age categories may negatively impact on the functioning of their schools, requesting clarity on how teachers working across the 7-19 age range would be registered.

Edinburgh Steiner School expresses further concern about removal of the 'Instructor' category, noting that this category is essential for specialist teachers. The respondent expresses concern that withdrawal of this category would result in a significant negative impact on recruitment and risk the continued operation of the school.

Drumduan School expresses concern about the potential impact of the proposed categories on Steiner/Waldorf kindergarten teachers. The respondent notes that kindergarten teachers have a very particular training and skill set, querying whether they would be required to complete training as a primary teacher.

The Scottish Council of Independent Schools expresses concerns that the proposed model does not consider the outcomes of the working group to support readiness for registration in the independent sector. The respondent states that the outcomes were homologated by GTC Scotland Education Committee and Full Council, stating that they therefore adhere to the governance requirements of GTC Scotland.

Bòrd na Gàidhlig requests clarity on the wording of the proposal. The respondent requests greater clarity on the phrases 'other contexts' and 'in the interests of specific learners.' The respondent specifically queries whether the intention is to enable a Secondary subject

registered teacher to teach their subject within a designated Primary setting, for example teaching P7 where the specific learners may be all children in Gaelic-Medium Education (GME).

The Scottish Sensory Centre notes that importance of ensuring that the focus remains on ensuring that teachers in the special school sector have the necessary skills to meet the needs of children and young people rather than being led by the category of registration. The respondent suggests that guidance emphasises the focus on skills.

Connect expresses concerns about the proposal, noting that this could be restrictive. The respondent requests clarity about whether non-subject specialists could take part in subject lessons to support literacy/numeracy to support accessibility. They note that literacy, numeracy and health and wellbeing are 'the responsibility of all' and therefore suggest that this should be possible.

Respondent concerns

Many respondents express concern about the proposed registration categories. These respondents express concern that the proposed categories are not representative of the full range of educational approaches available in Scotland. Particularly strong concerns are expressed on the potential significant negative impact of the proposed categories for schools within the independent sector, including Steiner/Waldorf schools.

Some respondents request clarity about a perceived contradiction in the GTC Scotland Consultation on Registration Rules document, whereby it states that the proposed categories will no longer relate to specific age ranges, then proposing to qualify Primary Education registrants to teach from early learning up to Primary 7. Respondents suggest that this is an implied age range and therefore contradictory. These respondents note that any implied age range for registration may have significant impacts across the sector and therefore request clarification.

Some respondents express concern about the potential negative impact of the proposed categories on a wide range of practitioners. These include: ASN teachers; Steiner School teachers; subject specialists; literary specialists; pastoral care staff; creative practitioners, and industry specialists. Respondents question the removal of the 'Additional Support Needs', 'Named School Only', and 'Instructor' categories. Respondents urgently request clarity about how people currently registered in these categories, and who may be working across a wide range of age groups and hold non-traditional qualifications, will maintain their registration in a way that does not significantly limit their work opportunities.

Some respondents express concern about the inclusion of Early Years in the primary category. Respondents specifically note that Steiner kindergarten training is very specific to the developmental stage of the children 3 to 6+ and contrasts strongly with mainstream primary training. Respondents request urgent clarity on whether early years specialists would be required to undertake mainstream teaching qualifications.

A few respondents express concern about removal of the Associate registration category and question the rationale for this decision. Specifically, respondents request clarity on how the proposed system will consider the variety of circumstances and roles of potential registrants.

A few respondents express concern that the proposed categories may restrict movement between sectors, preventing career development and reducing curriculum diversity. These respondents note that this may limit interdisciplinary working, limit the development of good practice across transition stages, and limit effective delivery of Broad General Education (BGE).

A few respondents express concern about potential impact on the additional support needs sector. Respondents note that in this sector, teachers are required to have comprehensive knowledge of a range of subjects beyond their own registered specialist subject. These

respondents express concern that the proposed categories could therefore significantly reduce the available curriculum.

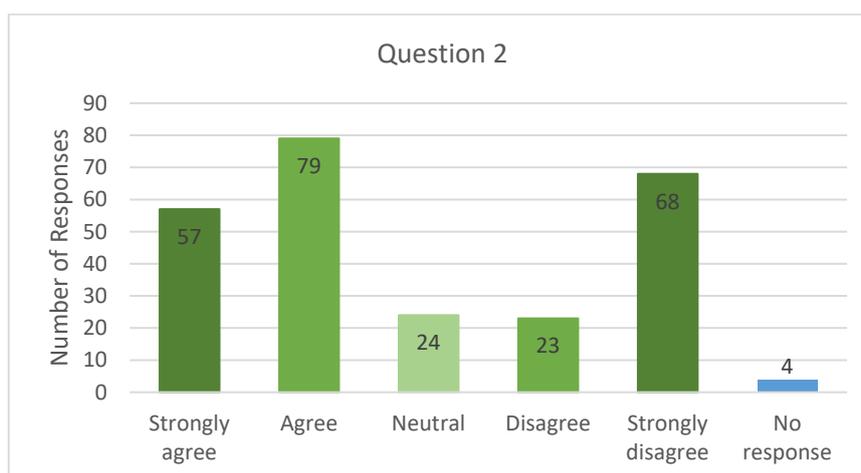
One respondent expresses concern about the inclusion of Colleges, suggesting that GTC Scotland is overstretched and should focus on health and wellbeing in schools before extending reach further.

Q2: The proposed changes to registration categories meet GTC Scotland’s aim to ensure the Register of Teachers reflects the Scottish education system.

2.1 Quantitative analysis

Responses to this proposal are divided, although there is a preference in support of the proposal. Slightly over half (53%) of respondents indicate that they either Strongly Agree or Agree with the proposal. Just over one third (36%) indicate that they either Strongly Disagree or Disagree, with a small proportion (11%) either remaining neutral or not providing a response.

When analysed by perspective, the groups indicating support for the proposal are local authority officers (75%), college lecturers (73%), individual teachers (62%) and university lecturers (58%). Three of the five national educational bodies support the proposal. Two educational bodies indicate that they either strongly disagree or disagree. The other groups indicating that they disagree to the proposal are parents/carers (91%), education stakeholders (77%), students/pupils (67%), university lecturers (43%), individual teachers (27%), college lecturers (13%) and local authority officers (10%).



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	33%	40%	13%	0%	13%	0%
Education stakeholder	0%	5%	5%	10%	67%	14%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	24%	38%	11%	9%	18%	1%
Local authority	0%	100%	0%	0%	0%	0%
Local authority officer(s)	50%	25%	15%	10%	0%	0%
National educational body	0%	60%	0%	20%	20%	0%
Parent(s)/carer(s)	4%	0%	4%	4%	87%	0%
Student/pupil	0%	0%	0%	0%	67%	33%
University lecturer	29%	29%	0%	29%	14%	0%
Grand Total	22%	31%	9%	9%	27%	2%

2.2 Qualitative analysis

2.2.1 Comments expressing support for the proposal

A few stakeholders express broad support for this proposal. Specifically, they welcome the increased flexibility and focus on knowledge and skills rather than age ranges. They do however note some caveats to their support, particularly regarding how the proposed changes could include the current expansion of Early Learning and Childcare.

One respondent expresses general support, noting that the statement reflects the presumption of mainstreaming in Scottish education, particularly where there is no option to complete Initial Teacher Education in Special Education or Additional Support Needs.

2.2.2. Suggestions about the proposal

Some respondents, including education stakeholders, suggest the following changes to ensure the Register of Teachers accurately reflects the Scottish education system:

- to accurately reflect the significant changes in the education sector since the Registration Rules were last updated, the college sector strongly suggests that the Further Education category be changed to College Education;
- to accurately reflect the diversity of choice available for students in Scotland, a few stakeholders suggest that the independent sector and those working outwith mainstream education need to be considered and accommodated equally in proposals;
- to ensure inclusion of schools working within the Steiner/Waldorf educational method, stakeholders and many respondents suggest the creation of a 'Steiner Schools Only' or 'Steiner Teacher' category;
- to recognise the fundamental concept of English language and Gaelic language delivery options within Scottish Education, Bòrd na Gàidhlig suggests that each category includes a further bullet point 'Either through the medium of English or Gaelic';
- to accurately reflect the number of teachers working in Additional Support Needs (ASN) resources and bases, including those with mandatory qualifications (TQVI or TQHI), a few respondents suggest inclusion of an Additional Support Needs/specialist category;
- to accurately reflect messages from national debates and consultations, the University of Edinburgh suggests alternative categorisations of teacher and/or subject groupings rather than discrete specialisms such as general science or languages;
- to prevent the creation of boundaries, and in the absence of a structural change around 'middle years', the University of Edinburgh suggests maintaining a distinct 'with transition' (or similar) category;
- to accurately reflect the breadth of expertise within Initial Teacher Education, the University of Edinburgh suggests a category of 'Teacher Education' or 'Initial Teacher Education', while recognising the need for careful consideration about what would constitute appropriate expertise and qualification to enable registration.

2.2.3 Comments expressing concern about the proposal

Stakeholder concerns

The University of Edinburgh expresses specific concern that the proposed changes do not fully reflect the aims of the current Curriculum for Excellence (CfE) structure and nor the opportunities to further develop Broad General Education and 3-18 or multistage campuses. The respondent notes that the proposals are not in line with some of the messages emerging

from other national debates and consultations and urge GTC Scotland to develop a coherent approach across national consultations.

The University of Edinburgh expresses further concern about registration of staff within Initial Teacher Education. The respondent notes that some staff within Initial Teacher Education have academic specialisms that, while essential to provision, do not fit into the proposed registration categories. Respondents express concern about unintended consequences of registration categories negatively affecting the breadth of expertise within Initial Teacher Education. They suggest there is a need for a relevant category of registration for this sector.

The Scottish Sensory Centre expresses concern that the priority for the special school sector is to have practitioners with the knowledge and skills required to meet the needs of children and young people rather than recruitment being led by category of registration. The respondent suggests that this should be emphasised in guidance.

Both Drumduan School and Edinburgh Steiner School express concern that the proposed registration categories reflect mainstream provision rather than the full diversity of educational provision available. They express strong concern about the potential negative impact of restrictive categories on their ability to continue to provide a broad curriculum across the 6-14 age range.

The Educational Institute of Scotland requests further clarity on the intended aim of the proposed changes to registration categories. They question whether the categories fully represent the different contexts in which teaching and learning takes place across the Scottish education system, noting the need for categories to accurately reflect the range of provision and different routes to qualification within each sector of Scottish education. The respondent states that a more flexible approach that reflects the full Empowered School System would be more consistent with Article 15(2) of the Public Services Reform (General Teaching Council for Scotland) Order 2011 ('the 2011 Order'), which allows GTC Scotland to 'set different procedures or different registration criteria for different types of teacher'. The respondent indicates that this approach would ensure current high standards are maintained whilst acknowledging the different contexts in which teaching and learning takes place across the Scottish education system.

Respondent concerns

Respondents express a variety of concerns about the proposed changes, stating that they are inflexible and do not accurately reflect the range of knowledge, skills, and experience within the Scottish education system. Specifically, respondents express concern that the categories do not represent the range of backgrounds and routes into the sector, including through vocational training and life experience. Respondents note the contribution of teachers, many with significant teaching experience in a non-core academic subject, who may not hold a traditional teacher training degree. Respondents further note that in some areas of practice teaching qualifications are not offered in the UK. Examples provided include Eurythmy and handwork, for example knitting and sewing, which within Steiner/Waldorf education form part of the pupils' overall development. These respondents suggest that extensive experience of the subject and specialist qualifications in Steiner/Waldorf education, for example, should be recognised as sufficient to teach non-core subjects. Respondents express strong concern that the current proposals mitigate against the inclusion of people from such diverse backgrounds within the sector.

Many respondents suggest that the proposal poses a significant threat to the future of Steiner/Waldorf education in Scotland. Respondents refer to section 4 of the Consultation on Registration Rules 'Registration Rules in Context' (Article 4, Paragraph 7) and highlight that there are currently two routes onto the Register of Teachers, which includes both a recognised teaching qualification and 'when the GTCS is otherwise satisfied that the individual's education, training and experience warrants the individual's registration.' Respondents

request clarity on whether both routes will remain available in the new model and urge GTC Scotland to utilise its powers to set standards for those who do not possess a teaching qualification, stating that this is essential to preserve the integrity of Steiner/Waldorf education in Scotland.

A few respondents express concern about the conceptual assumptions and educational models that inform the proposed categories, noting that these appear to reflect mainstream educational approaches. Respondents note that schools within the independent sector provide education with a specific understanding of child development, and they express concern that this conceptualisation is not clearly reflected in the proposed categories. Respondents express concern that the categories of 'Primary' and 'Secondary' pupils, when combined with removal of the 'Named School Only' category, may have unintended consequences for pupils' learning, teacher retention, and community school life across the independent sector.

A few respondents express concern that the proposed categories will limit movement across sectors and between subjects. Respondents note that many teachers work across Primary and Secondary levels, including specialist teachers, for example Qualified Teachers of the Hearing/Visually Impaired (QTHI and QTVI) and within literacy, numeracy, health and wellbeing, Broad General Education and the creative arts. These respondents state that this movement occurs within rural and joint campus schools, independent schools and special schools but also increasingly within mainstream settings. Respondents indicate that this movement enriches the sector, improves pupil experience, and secures posts for specialist and rural teachers. These respondents express concern that the rigidity of the proposed categories will prevent movement across sectors and negatively impact job security and curriculum diversity.

A few respondents express concern that the proposed changes reflect the current system rather than envisioning the potential of the sector. These respondents note that it is currently difficult to transfer into the Scottish education system, and express concern that the proposed categories would continue the difficulties teachers trained outside Scotland currently face to register in Scotland.

A few respondents express concern that the proposed categories do not reflect the distinctive and specialist provisions within the Early Learning and special school sectors.

One respondent highlights that Scottish education is working towards the recommendations of the BERA manifesto at COP26 and the Creative Scotland and Education Scotland Action Plan for 2021-2022 and suggests that the proposed changes may prohibit the development of this curriculum.

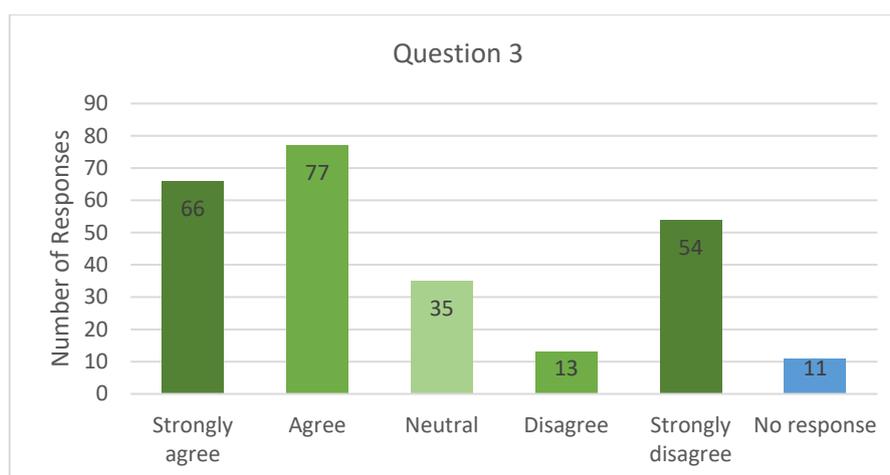
Q3: GTC Scotland propose that individuals registered in the category of Primary Education will be registered to teach:

- the entirety of the early learning and childcare and primary curriculum from early learning and childcare through to Primary 7;
- literacy, numeracy and health and wellbeing across Broad General Education in other contexts in the interests of specific learners.

3.1 Quantitative analysis

Responses to this proposal are divided, although there is a preference in support of the proposal. Slightly over half of respondents (56%) indicate that they either Strongly Agree or Agree with the proposal. Just over one quarter (26%) indicate that they either Strongly Disagree or Disagree. Nearly one fifth (18%) of respondents either remained neutral or did not provide an answer.

When analysed by perspective, the groups indicating support for the proposal are university lecturers (86%), local authority officers (80%), individual teachers (67%) and college lecturers (47%). Four of the five national educational bodies support the proposal. One educational body indicates that they strongly disagree. The other groups indicating that they disagree to the proposal are parents/carers (87%), students/pupils (67%), education stakeholders (38%), individual teachers (22%) and college lecturers (7%).



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	40%	7%	40%	7%	0%	7%
Education stakeholder	5%	0%	24%	5%	33%	33%
Government organisations	0%	0%	100%	0%	0%	0%
Individual teacher	31%	36%	11%	7%	15%	1%
Local authority	0%	100%	0%	0%	0%	0%
Local authority officer(s)	35%	45%	15%	0%	0%	5%
National educational body	0%	80%	0%	0%	20%	0%
Parent(s)/carer(s)	4%	4%	4%	0%	87%	0%
Student/pupil	0%	0%	0%	0%	67%	33%
University lecturer	29%	57%	14%	0%	0%	0%
Grand Total	26%	30%	14%	5%	21%	4%

3.2 Qualitative analysis

3.2.1 Comments expressing support for the proposal

A few education stakeholders express general support for the proposal, specifically welcoming the flexibility and overall clarity of definition and noting that the proposal meets the qualification expectation.

A few respondents express support for the proposal, noting that this will be beneficial for transition, delivering Broad General Education and to support pupils with Additional Support Needs. One respondent expresses support for the proposal except for the age cap at Primary 7, without providing further detail.

3.2.2 Suggestions about the proposal

Suggestions note the importance of the 'middle years' or transition, suggesting that a Primary specialist for Broad General Education could support transition into secondary education.

One respondent suggests that the standard of mathematics qualification required for entry to the profession be raised to ensure a better delivery of numeracy, without expanding further.

3.2.3 Comments expressing concern about the proposal

Stakeholder concerns

The University of Edinburgh expresses concern about the implied assumption that all primary qualified teachers are equipped to teach across the transition stages in core areas of literacy, numeracy and health and wellbeing. They express concern that many Initial Teacher Education programmes or opportunities built into the Teacher Induction Scheme will not support sufficient skill development to work at the transition stages. This respondent therefore suggests that consideration be given to the ongoing CLPL opportunities and national work required to support this approach to Broad General Education and transition work.

The University of Edinburgh expresses further concern that other areas of specialism have not been recognised in the proposal, including the qualification to be registered in Gaelic-Medium Education. They note that this qualification is a distinct categorisation rather than an accredited specialism, so request clarity on how this will be recognised within the proposal. They note however that it may be worthwhile considering making provision for Gaelic-Medium Education as an additional accredited specialism to further increase the number of Gaelic-Medium Education teachers in Scotland.

The Educational Institute of Scotland expresses a range of concerns about the proposal. They question the need to change the definition of Primary Education registration, stating that the current definition is clear and the explicit reference to age helpful. They express concern about inconsistency within the proposal. Specifically, the respondent notes that the first part of the definition states early years to primary 7, which in effect retains age-based categorisation, but in the second element of the definition, the age limit is removed. They suggest that this is confused and fragmented definition that may be open to misinterpretation and potential abuse. The respondent further notes that the proposed definition appears to run counter to the recent Court of Session ruling that teachers should be employed to teach within the sector for which they are registered.

The Educational Institute of Scotland expresses further concern about terminology used in reference to the curriculum. They question the terms 'early learning and childcare curriculum' and 'primary curriculum' within the proposed definition, noting that the Curriculum for Excellence (CfE) provides one overarching framework for learning from 3-18 years. The respondent suggests that the use of arbitrary limits within this framework distorts the principles underpinning the Curriculum for Excellence and fails to recognise the importance of tailoring

learning to the needs of individual children. The respondent warns that any reference to 'primary curriculum' may be interpreted as restricting delivery to the second level of the Broad General Education. This approach fails to recognise that in meeting the needs of all learners, a teacher in the Primary category may be delivering aspects of the curriculum beyond the second level and the respondent therefore suggests that such a restrictive definition may be contrary to inclusive practice.

The Educational Institute of Scotland expresses further concern about the lack of clarity about the term 'in other contexts in the interests of specific learners.' The respondent expresses concern that if this includes Secondary contexts, then this blurs the distinct Primary and Secondary registration categories. They express significant concern that this lack of clarity could be open to abuse, suggesting that in cases of staff absence or staff shortages Primary registrants could be deployed to teach English or Maths and perhaps Additional Support Needs support for young people in the Broad General Education. The respondent suggests that this is inappropriate both for pupils, who are entitled to be taught by someone qualified in the subject, and for Primary teachers, who may have increased feelings of anxiety about working in a context which is beyond the scope of their registration category and qualifications.

The Scottish Social Services Council (SSSC) states that they have a significant role in the professional development of the Early Learning and Childhood sector, noting their responsibility for setting the Standard for Childhood Practice. They provide detail of research they have undertaken into the effectiveness of their work on childhood practice, without providing specific details about their view of the proposal.

The Scottish Council of Independent Schools requests clarity on the evidence supporting the proposal. They request clarity on the reference to Broad General Education, noting that it is unclear how this relates to GTC Scotland's endorsement of other Initial Teacher Education programmes such as Edinburgh Transformative Teaching Masters.

Drumduan School expresses strong concern about the inclusion of Primary 7 within the proposal, noting that this does not reflect their approach to education. They suggest that there either needs to be flexibility within the model or a new category created to reflect educational models where lower/primary teaching extends to 14 years (equivalent of S1/S2).

Drumduan School expresses further concern about registration of Steiner Kindergarten Teachers. They request clarity on whether there will be any expectation for them to train as mainstream Primary teachers, noting that this would be inappropriate as Early Years learning is recognised a different skill set within the Steiner curriculum.

Connect expresses concern about transition, noting the importance of the transition period from Primary into the Broad General Education at Secondary level. The respondent suggests that it is important to have teachers who can provide continuity to young people at this critical phase and to support them as necessary in Secondary school. They note that transition phase is increasingly seen as a pivotal point in the education of young people and question why, given the development of programmes specifically to prepare teachers to work across this phase, there remains no professional recognition of the transition stage within registration. The respondent suggests that the proposed changes could make the system less flexible. They suggest that, from the perspective of children and young people, this siloed approach to categorisation may not be helpful.

Respondent concerns

Some respondents express concern about the inclusion of Early Years in the Primary category. Respondents note that Early Learning and Childcare is distinct from Primary Education, with different qualifications, legislation and guidance, and suggest that as such Early Years should be considered separately. Respondents note that registration currently lies with the Scottish Social Services Council (SSSC) and request clarity regarding registration for Early Years practitioners. They suggest that if registration is going to be through GTC

Scotland then the distinct skills and qualifications within Early Learning and Childcare should be recognised as distinct from Primary Teachers.

Respondents express concern about teachers' limited experience of nursery settings during practice placements and note that they are unable to complete their probationary year in nursery. Respondents suggest that this means most newly qualified teachers have little to no understanding of Early Learning and Childcare practice. They therefore suggest that if this definition were to go ahead significant changes would need to occur within Initial Teacher Education, for example through revising practice placements and probationary year placements to ensure that teachers have the necessary experience. Respondents note that these revisions to Initial Teacher Education would therefore need to be funded accordingly.

Many respondents express concern that the proposed divisions do not reflect the structure of Steiner/Waldorf education. These respondents express strong concern about the potential impact of the proposal on schools within the independent sector, including schools following the Steiner/Waldorf model. These respondents state that the proposal does not reflect alternative models of education, specifically where class teachers work across the 6-14 year age range and specialist teachers may work with both lower and upper pupils. These respondents strongly suggest that flexibility is needed to enable alternative models of education to continue to flourish within the Scottish education system.

A few respondents suggest GTC Scotland liaise with educational unions and local authorities to clearly define the phrase 'literacy, numeracy and health and wellbeing across BGE in other contexts in the interests of specific learners.' These respondents express concern that this lack of clarity may result in Primary registered teachers being asked to cover staff shortages at Secondary level, with some respondents noting cases where this is currently occurring. Further concern is raised about employers potentially requiring Primary registered teachers to teach up to S3 level. These respondents note that this change may cause significant anxiety for some Primary registered teachers.

A few respondents express concern about Primary registered teachers working at Secondary level, suggesting that it is not conducive to pupil morale to have secondary pupils taught by primary teachers. They question the inconsistency of this approach, noting that pupils working at pre-early level in Primary school are not taught by nursery teachers. These respondents suggest that a more inclusive approach would be to train Secondary teachers to support pupils working at early to second level. These respondents express further concern that the phrase 'in the interests of specific learners' maintains the assumption within mainstream education that Primary registered teachers working at Secondary level only work with pupils with Additional Support Needs, rather than contributing to the wider curriculum.

A few respondents express concern about the impact of this proposal on the quality of Secondary education. These respondents suggest that the generalist nature of Primary education is unsuitable at Secondary level. Further concerns are expressed about Primary registered teachers teaching numeracy beyond the Primary level. One respondent notes that the numeracy qualifications required to enter Primary teaching programmes are not as advanced as the requirements if seeking to teach at Secondary level. This respondent therefore expresses concern about Primary registered teachers teaching numeracy across the Broad General Education category and suggests that the standard of numeracy teaching in Secondary settings may be undermined.

A few respondents express concern about the breadth of requirements placed on Primary teachers, suggesting that there is a need for literacy and numeracy specialists to meet learning needs.

A few respondents express concern that the proposal does not appear to take into consideration the situation for learners in special schools who are beyond the chronological age of P7 but where the whole curriculum is still addressed at pre-early level. Clarification is requested.

A few respondents express concern that the proposal is not suitable for Qualified Teachers of the Hearing Impaired (QTHI) and Qualified Teachers of the Visually Impaired (QTVI) as they are qualified to work across the full 0-18 age range.

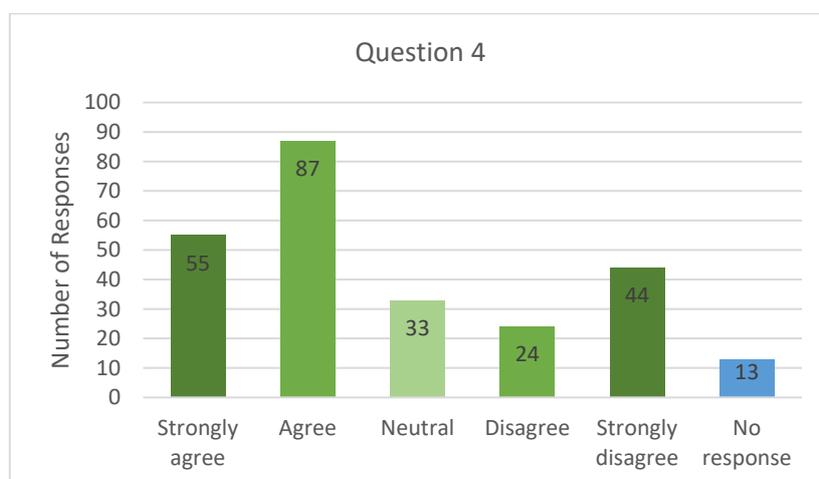
Q4: GTC Scotland propose that individuals registered in the category of Secondary Subject Education will be registered to teach:

- their specific registered subject as part of the secondary curriculum across the entirety of the Broad General Education and Senior Phase;
- their specific registered subject in other contexts in the interests of specific learners;
- skills for learning, life and work, interdisciplinary learning and responsibilities for all as part of the secondary curriculum.

4.1 Quantitative analysis

Responses to this proposal are divided, although there is a preference in support of the proposal. Slightly over half (55%) of respondents indicate that they either Strongly Agree or Agree with the proposal. Just over one one-quarter (26%) indicate that they either Strongly Disagree or Disagree. Nearly one fifth (18%) of respondents either remained neutral or did not provide an answer.

When analysed by perspective, the groups indicating support for the proposal are university lecturers (85%), local authority officers (85%), individual teachers (64%) and college lecturers (54%). Three of the five national educational bodies support the proposal. Two educational bodies provided a neutral response. The groups indicating that they disagree with the proposal are parents/carers (87%), students/pupils (67%), education stakeholders (43%), individual teachers (21%), local authority officers (10%) and college lecturers (7%).



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	27%	27%	33%	7%	0%	7%
Education stakeholder	0%	5%	19%	10%	33%	33%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	25%	39%	13%	10%	11%	2%
Local authority	0%	100%	0%	0%	0%	0%
Local authority officer(s)	45%	40%	5%	10%	0%	0%
National educational body	0%	60%	40%	0%	0%	0%
Parent(s)/carer(s)	4%	4%	4%	13%	74%	0%
Student/pupil	0%	0%	0%	0%	67%	33%
University lecturer	14%	71%	0%	0%	0%	14%

Grand Total	21%	34%	13%	9%	17%	5%
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4.2 Qualitative analysis

4.2.1 Comments expressing support for the proposal

A few stakeholders express support for the proposal, specifically that they welcome the flexibility to teach cross sector and outwith subject areas. One stakeholder states that the proposal meets the qualification expectation.

A few respondents express support and state that this is particularly welcome for STEM and expressive arts subjects as it will increase expertise and improve teaching in these areas. These respondents welcome the focus on skills for learning, life and work, interdisciplinary learning and responsibilities for all as part of the secondary curriculum. They state that this will strengthen connections across secondary education.

A few respondents express broad support with the caveat that a careful balance needs to be sought between freedom to draw on experience or expertise outwith qualifying subject areas and teachers being obliged to teach classes they are not qualified in. One respondent suggests the phrasing be changed to: 'Teacher (of English) as subject: capacities in (x, y & z) to support BGE.'

4.2.2 Suggestions about the proposal

One stakeholder suggests that the proposal could be more explicitly worded to specify that this includes flexibility to teach interdisciplinary subjects, such as Scottish Studies, and different curricular levels, including National 1/2/3.

One respondent suggests that Secondary registered teachers should also be able to teach at HNC/HND levels.

One respondent suggests flexibility that enables a teacher to cover subject areas that are outwith their subject specialism should be welcome if the teacher feels comfortable and competent with the subject. The respondent suggest that this could help with teacher shortages and absence. Another respondent notes that many teachers have taught a second subject for several years, sometimes without being qualified, and expresses concern that the new proposal would prevent this from continuing. However, in contrast, another respondent expresses concern that a teacher should not be forced to teach subjects for which they feel they are not qualified.

One respondent suggests that GTC Scotland look further at degree transcripts and experience of teachers teaching outwith Scotland, without clarifying further.

4.2.3 Comments expressing concern about the proposal

Stakeholder concerns

The Educational Institute of Scotland (EIS) questions the need to change the current definition of the Secondary Education category, noting that they are not aware of any issues arising from application of this definition. The respondent states that the current definition is clear and enables flexibility.

The Educational Institute of Scotland (EIS) expresses concern about the reference to the 'secondary curriculum'. They state that this does not reflect the flexibility embedded in Curriculum for Excellence nor the reality that Secondary teachers will be delivering learning and teaching across all curricular levels within their subject area. The respondent requests clarity for the phrase 'other contexts in the interests of specific learners' stating that there is the potential for confusion and abuse.

Drumduan School requests clarity on the phrase 'interests of specific learners', specifically as to whether this would enable specialist and subject teachers to teach curricula areas to children at Primary level. The respondent emphasises that the ability of teachers to teach across the whole school is central to the Steiner/Waldorf methodology.

Edinburgh Steiner School expresses concern about the removal of the 'Instructor' category, emphasising that this category is essential to the continued ethos of their educational model and to their recruitment processes for specialist teachers.

The Scottish Sensory Centre expresses concern about the impact of the proposal on teachers working across Primary and Secondary levels, for example music teachers, dance teachers, and peripatetic teachers of sensory impairment. The respondent notes that registration should accommodate this group of teachers.

The Scottish Council of Independent Schools request clarity on whether this would allow Secondary registered teachers to teach their specialism in Primary contexts.

Bòrd na Gàidhlig request clarity on the phrase 'in other contexts', noting that this particularly impacts Gaelic-Medium Education provision. The respondent states that this provision across Primary and Secondary curriculum offers and transitions requires significant strategic planning, resulting in deployment and curriculum construction needing additional strategic intervention at both school and Local Authority level.

The NASUWT expresses concern about impact on staff, noting that there is the potential unintended consequence of the flexibility becoming a significant workload driver and increasing stress of staff. The respondent suggests that appropriate prevention safeguards would need to be put in place to protect workloads.

Respondent concerns

Many respondents express strong concern about the Primary and Secondary categories, noting that this does not accurately reflect educational models outwith mainstream provision. Respondents suggest that a strength of the all-through model is that younger pupils have access to and can benefit from the expertise of teachers employed to work mainly with older pupils. Respondents request urgent clarity on the phrase 'interests of specific learners' and seek clarity on whether this would enable specialist and subject teachers to teach curricula areas to children at Primary level.

A few respondents express concern about the impact of the proposal on specialist subject teachers, suggesting that they may need to work across several schools to achieve full-time hours. Concern is also expressed that an unintended consequence of the proposal may be that teachers spend more time teaching other areas of the curriculum than their own subject specialism. One respondent suggests that a minimum teaching time for a subject may safeguard against this occurring.

A few respondents express concern about Secondary registered teachers working at Primary level. Concerns include that the training is not sufficient to understand the learning needs of lower Primary pupils and that working at the transition stage is a specialism with specific knowledge and skills. One respondent expresses concern that the proposed changes do not recognise this and would impact negatively on pupil experience.

A few respondents express concern about definition and quality of Broad General Education, providing examples of where teachers are being asked to teach subjects outwith their subject areas and noting that this is not ensuring quality of service for pupils. One respondent suggests that the proposed definition will require a change in the concept of subject specialist in Secondary schools, particularly given the focus on raising attainment in the Senior Phase which determines what is studied and how it is studied in Broad General Education. A few respondents express scepticism about the motives of Broad General Education, indicating that this is a source of stress for staff particularly within the Senior Phase.

A few respondents express concern about a perceived inconsistency between the definitions for Primary and Secondary registered teachers. Respondents note that in contrast to the definition for Primary registered teachers, there is no specific mention of Secondary registered teachers working with pupils achieving beyond second level in the Primary context. They question why Primary registered teachers are working with Secondary pupils working below third level when Secondary registered teachers are not working with Primary pupils working beyond the second level. Respondents suggest that this does not provide parity for Secondary teachers and could be perceived as devaluing the work of Secondary registered colleagues.

A few respondents request clarity of definitions of all terms, including interdisciplinary learning, skills for all and what is meant by 'in other contexts.'

A few respondents express concern that the proposal prevents diversity of experience and potentially prevents people entering teaching through non-traditional routes.

A few respondents express concern about the impact on Initial Teacher Education, specifically the need to ensure that the programmes accurately reflect the proposed changes, and that programmes are structured and funded appropriately. One respondent states that the current system requires Secondary registered teachers teaching interdisciplinary learning to have a registered subject specialism in Initial Teacher Education, noting that flexibility within Initial Teacher Education will be required to fully implement this proposal.

One respondent expresses concern about how special schools, where teachers work with older pupils at the pre- and early-stages, will be included within the proposed categories. Similarly, respondents question how specialist teachers working with visually and/or hearing impaired pupils will be included in the proposed categories.

One respondent requests clarity about Social Subjects (History/Modern Studies/Geography), noting the lack of certified course availability in Scotland. The respondent provides the example of whether taking Geography or Modern Studies modules to add to a History qualification would allow someone to teach in a social areas department.

One respondent requests clarity for how Pastoral Care will be registered in the proposed model.

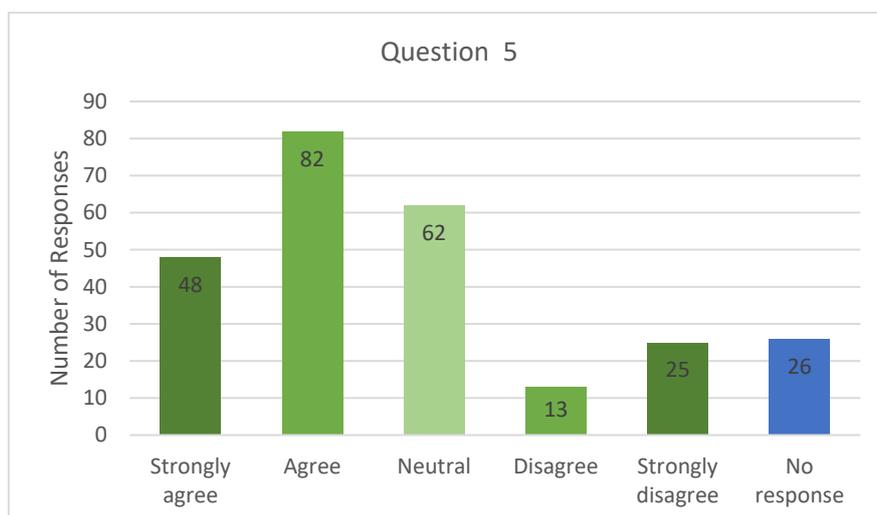
Q5: GTC Scotland propose that individuals registered in the category of Further Education will be registered to teach:

- their subject or vocational specialism across the entirety of further education;
- skills for learning, life and work, interdisciplinary learning and responsibilities for all as part of further education;
- their subject or vocational specialism within the senior phase of the secondary education curriculum as part of agreed school and college partnership arrangements where the teacher of further education is contributing to a specific learning purpose and extending the curriculum offer in the interest of learners as part of learners' overall provision of school senior phase education and is supervised by the provider of school education

5.1 Quantitative analysis

Responses to this proposal are broadly supportive, although it should be noted that a significant proportion (24%) of respondents provided a neutral response. Overall, just over half (51%) of respondents indicate that they either Strongly Agree or Agree with the proposal. A small proportion (15%) indicate that they either Strongly Disagree or Disagree.

When analysed by perspective, just over half (55%) of individual teachers support the proposal with just under one third (30%) remaining neutral. Most local authority officers (85%), university lecturers (72%) and college lecturers (67%) support the proposal. All five national educational bodies indicate that they agree with the proposal. The groups indicating that they do not support the proposal are education stakeholders (53%), college lecturers (33%), parents/carers (21%), university lecturers (14%) and individual teachers (10%).



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	40%	27%	0%	13%	20%	0%
Education stakeholder	5%	5%	5%	5%	48%	33%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	18%	37%	30%	5%	5%	5%
Local authority	0%	0%	100%	0%	0%	0%
Local authority officer(s)	45%	40%	15%	0%	0%	0%
National educational body	0%	100%	0%	0%	0%	0%
Parent(s)/carer(s)	4%	4%	35%	4%	17%	35%
Student/pupil	0%	0%	0%	0%	0%	100%
University lecturer	29%	43%	14%	14%	0%	0%
Total	19%	32%	24%	5%	10%	10%

5.2 Qualitative analysis

5.2.1 Comments expressing support for the proposal

Connect expresses support for the proposal, stating that the idea is sound and noting that Colleges are increasingly involved with schools, and so suitably qualified teachers are required. The respondents expresses general support for increased flexibility across the teaching profession, irrespective of sector.

A few respondents express support for the proposal, specifically welcoming the recognition of partnership working between Secondary schools and Colleges, noting the valuable contribution that college lecturers can have at Secondary level. These respondents suggest that this will ensure flexibility and help meet the needs, interests and talents of pupils.

5.2.2 Suggestions about the proposal

Colleges Scotland, along with seven colleges, strongly urges a change in wording to ensure the definition more accurately reflects the diversity of experience within the College sector. The College sector proposes the wording change to:

‘GTC Scotland propose that individuals registered in the category of Tertiary Education will be registered to teach:

- their industry knowledge across the entirety of the college curriculum
- skills for learning, life and work, interdisciplinary learning and responsibilities for all as part of the college curriculum
- their industry knowledge through college curriculum within the senior phase of the secondary education curriculum as part of agreed school and college partnership arrangements. This will be where the college lecturer is contributing to a specific learning purpose and extending the curriculum offer in the interest of learners as part of learners’ overall senior phase education, working in partnership with the provider of school education.’

A few respondents suggest a change of wording within the proposal to reflect the breadth of experience and qualifications within the College sector more accurately. Respondents express concern that the phrasing ‘their subject or vocational specialism’ may be too narrow, suggesting re-phrasing to: ‘Their subject(s) and vocational specialism(s)’.

A few respondents suggest that there should be flexibility within the categories to enable College lecturers to work across the full range of Secondary and College level education, provided they have the relevant qualifications.

A few respondents suggest that the category should be expanded to include Higher Education to accurately represent the range of programmes available in colleges.

5.2.2 Comments expressing concern about the proposal

Stakeholder concerns

The College sector, along with seven colleges, expresses strong concern about the proposal. The respondents state that, if implemented, the proposal would have immediate significant and detrimental implications for young people's learning and attainment. These respondents suggest that if implemented, many colleges would need to immediately step back from delivery due to the exclusion of vocational learning from the definition. The respondents express concern about GTC Scotland's view of vocational programmes, stating that in their view the proposed definition does not give equal value between academic and vocational learning. The respondents express specific concern that the proposed changes would have very significant negative impacts on key Scottish Government educational strategies, including Developing the Young Workforce and the progress of Foundation Apprenticeships. The respondents state that it is inappropriate to apply a subject specific approach to college education as this is increasingly characterised by interdisciplinary learning, teaching and assessment. They suggest that the proposed definition would significantly negatively affect the breadth of curriculum and depth of learner journeys currently offered.

These respondents express further concern that the definition does not include reference to occupational experience, noting that that industrial experience and occupational competence are central to the dual expertise of lecturing staff. The respondents express concern that the definition does not represent the full range of programmes offered within colleges, from SCQF level 4 to 11 and through to degrees and post-graduate qualifications, which devalues and misrepresents the sector.

The College sector expresses further serious concern about the proposal for supervision of College staff within Secondary settings. These respondents suggest that the proposal does not meet the needs of the parties involved and is unnecessarily restrictive and burdensome. They highlight that awareness of Scottish educational frameworks are a key element of lecturer professionalism and training, that lecturers work with the Getting it Right for Every Child (GIRFEC) principles on a daily basis, are responsible for upholding their Professional Standards through their own safeguarding requirements, and are required to be members of the Protection of Vulnerable Groups (PVG) scheme. As such, respondents suggest that the logic underpinning the requirement for supervision is flawed and the sentiment offensive. The same respondents further note that the supervision requirement is likely to be unmanageable for both schools and colleges and therefore unenforceable by GTC Scotland.

The Educational Institute of Scotland expresses serious concern about the proposal, requesting a clear rationale be provided for the move away from the current generalist approach to the requirement that Further Education lecturers register a subject specialism. The respondent notes that while the roll-out of the national registration programme for college lecturers is underway, the routes to registration for all college lecturers are still under consideration. The respondent suggests that further change in relation to the definition of the category is unhelpful at this time, recommending instead that the issue be re-visited at a later date once the registration programme has been fully embedded.

The Educational Institute of Scotland expresses further concern about the proposal of supervision of Further Education lecturers. The respondent notes that where delivery involves the young person attending a college campus, there is no requirement for the lecturer to be 'supervised' by a schoolteacher. However, where a lecturer is attending a Secondary school

with the purpose of delivering learning and teaching in a specified subject area, or is teaching remotely to learners who are present in a school building, the lecturer should be 'supervised' or accompanied by the provider of school education. The respondent notes that their understanding is that this requirement is rooted in legislation. They express concern however that, in their view, the consultation document (in footnote 3) erroneously seeks to explain the requirement for supervision in this context through reference to learning needs and understanding of GIRFEC. The respondent suggests however that the requirement for 'supervision' is rooted in legislation and child protection principles. They note that Section 1 of the Education (Scotland) Act 1980 and section 2(1) of the Standards in Scotland's Schools Act 2000 place a duty on local authorities to secure an 'adequate and efficient' provision of education for their area. In discharging this obligation, Regulation 4 of the Requirements for Teachers (Scotland) Regulations 2005 provides that the education authority will 'employ only a registered teacher as a teacher.' As registration in this context is defined as being with GTC Scotland, college lecturers are not employed by the local authority and cannot therefore discharge the statutory duty in relation to the provision of education in the school context. The respondent notes a further confusion in that Footnote 3 in the consultation document suggests that those college lecturers who are registered with GTC Scotland can teach in schools without supervision. The respondent suggests that this is contrary to the statutory provisions highlighted above and contrary to the recent Court of Session decision which reinforced GTC Scotland's position that registrants should only be employed in the sector for which they are registered. The respondent therefore suggests that when College lecturers are delivering teaching in a school they are 'supervised' or accompanied by a GTC Scotland registered teacher. The respondent suggests that these arrangements should be in place regardless of whether the college lecturer is registered with GTC Scotland, noting that even when registered College lecturers will be registered under a different sector.

The University of Edinburgh expresses concern about 'skills for life' and transition to work, particularly at the interface between Secondary and Further Education via Secondary pupils taking up courses at Further Education colleges. The respondent suggests that the divide between Secondary level and Further Education does not ensure pupils are equally supported through this transition, noting that pupils may be taught at college by specialists with limited age-appropriate knowledge.

Respondent concerns

A few respondents express concern about inconsistency across the proposed definitions, questioning why the definition for Secondary registered teachers includes Broad General Education while the definition for Further Education does not.

A few respondents express concern that the proposal does not accurately reflect the variety of routes into work within the Further Education sector and suggest that a more flexible approach is required.

A few respondents express concern about the requirement that lecturers will need to be supervised when working in schools, noting that the implications of this requirement will need to be clearly explained. One respondent suggests that Local Authorities will need time to explore the implications arising from this proposal.

One respondent expresses concern that the proposal requires learning and teaching in Further Education colleges to be like that of schools, noting that these are not always aligned. The respondent suggests that the proposal may prevent Secondary teachers having the opportunity to upskill and expand their repertoire of expertise and competence through teaching in College settings.

One respondent expresses concern about the impact of the proposed changes on specialist staff, noting that it may become more difficult for them to transition into teaching. They suggest

that this may negatively impact diversity within the sector. One respondent states that, in their view, the proposed changes would end their 25 year teaching career.

One respondent expresses concern about the need to ensure that relevant Career Long Professional Learning is available within interdisciplinary learning and Skills for Learning, Life and Work.

A few respondents express scepticism about the motives underpinning the proposal, suggesting that bringing Further Education lecturers into Secondary teaching may be a strategy to address staff shortages.

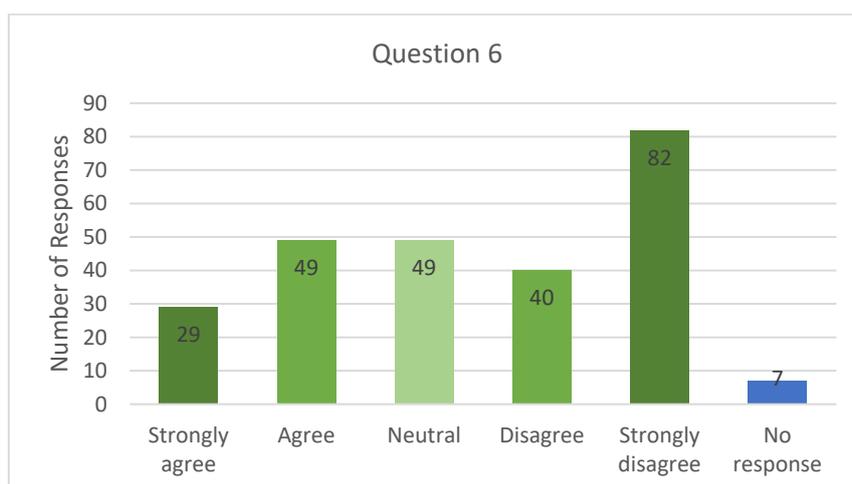
One respondent expresses concern about cost and questions the registration fee.

Q6: The proposed change is to cease the existing category of Additional Support Needs.

6.1 Quantitative analysis

The responses to this proposal are divided but indicate a significant level of disagreement with the proposal. Only one third (30%) of respondents indicate that they either Strongly Agree or Agree to the proposal, with nearly half (48%) of respondents indicating that they either Strongly Disagree or Disagree. Just under one-fifth (19%) of respondents provided a neutral response.

When analysed by perspective, slightly over one-quarter (27%) of individual teachers indicate that they support the proposal, with the same proportion (27%) remaining neutral. The majority of local authority officers (85%) and university lecturers (86%) support the proposal. Four of the five national educational bodies indicate support for the proposal with one body indicating that they strongly disagree. The groups that indicate that they do not support the proposal are parents/carers (100%), education stakeholders (81%), students/pupils (67%), college lecturers (54%), individual teachers (44%), university lecturers (14%) and local education officers (10%).



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	20%	7%	20%	27%	27%	0%
Education stakeholder	5%	5%	14%	33%	38%	5%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	9%	18%	27%	16%	28%	3%
Local authority	100%	0%	0%	0%	0%	0%
Local authority officer(s)	40%	45%	0%	10%	0%	5%
National educational body	20%	60%	0%	0%	20%	0%
Parent(s)/carer(s)	0%	0%	0%	4%	96%	0%
Student/pupil	0%	0%	0%	0%	67%	33%
University lecturer	0%	86%	0%	0%	14%	0%
Total	11%	19%	19%	16%	32%	3%

6.2 Qualitative analysis

6.2.1 Comments expressing support for the proposal

The University of Edinburgh, Bòrd na Gàidhlig and the NASUWT express broad support for the proposal while noting the need for reassurance that the proposals will not dilute the achievements of Additional Support Needs specialists. Education Scotland express support, stating that the proposal allows flexibility in staffing and recruitment, and increases career options for teachers. The respondent also notes the need to consider employment rights of people currently registered as Additional Support Needs specialists. The Scottish Sensory Centre welcomes the proposal, stating that it allows specific fields within the wide umbrella term of Additional Support Needs to be recognised, thereby increasing transparency for both employers and parents.

Children In Scotland express support for the intentions behind the proposal, noting that their work with GTC Scotland on the refreshed Professional Standards for teachers highlighted that children and young people believe an essential part of being a good teacher is provision of support based on the individual needs of every child. Through their experience of Enquire, the Scottish advice service for additional support for learning, Children In Scotland agree with the proposal that all teachers should understand their responsibilities towards children and young people with Additional Support Needs, and that specialists should be fully registered teachers. Children in Scotland further welcomes the proposal for the establishment of Accredited Specialisms, noting that this allows individuals to demonstrate their specific skill set to learners and employers. They acknowledge the assertion that this allows for specific specialisms to be formally recognised.

Some respondents express support in general terms, stating that Additional Support Needs should be the responsibility for all, and the proposal improves integrity within the Additional Support Needs sector. A few respondents state that the presumption of mainstreaming for pupils with Additional Support Needs means that there must be a corresponding presumption that mainstream teachers have the level of knowledge necessary to meet needs and ensure inclusion. A few respondents note that ensuring all teachers have a basic grounding in Additional Support Needs combined with opportunities to specialise through an Accredited Specialism ensures that Additional Support Needs pupils get highest quality teaching experiences.

6.2.2 Suggestions about the proposal

A few stakeholders, including Education Scotland and Edinburgh Steiner School, request clarity over potential impact on people currently registered as Additional Support Needs specialists. These respondents request clarification about transitional arrangements, particularly whether the proposal will be retrospective and what, if any, protective provisions will be put in place for current specialists. The College sector requests further detail on the approach to be taken and seeks reassurance of how the proposal would work in practice.

Children In Scotland suggest that GTC Scotland needs to support teachers to access a wide range of training in Additional Support Needs both throughout Initial Teacher Education and continuing professional development. They suggest that GTC Scotland explore the effectiveness of current delivery around additional support for learning in Initial Teacher Education with the policy officials who are leading a review of its content and impact. The respondent notes that they have listened to pupils who have stated that it is important to them to feel as though teachers have had enough training to understand why they need additional support at school. The respondent provides the view of one young person:

“I think there should be an education programme for the teachers about being a young carer and mental health because a lot of them don’t get it at all. It should be an enforced course and not optional.”

A few respondents suggest dual registrations for Additional Support Needs specialists, enabled through specialist initial qualification routes, that would allow specialists to work across Primary and Secondary settings.

A few respondents provide suggestions about qualifications for Additional Support Needs specialists, including:

- more flexibility for routes into Additional Support Needs, for example people with a relevant degree, such as Psychology, Special Educational Needs, or disability and inclusion, undertaking a PGDE to qualify as an Additional Support Needs specialist;
- mandatory qualifications for Additional Support Needs, similar to requirements to work with young people with hearing or vision impairment;
- require a separate Additional Support Needs qualification, combined with additional accreditations, to work in Additional Support Needs schools and bases;
- that pay scales recognise additional qualifications, accreditations and experience;
- that dual qualifications, for example maths with Additional Support Needs, may be a more effective way to represent the breadth of the Additional Support Needs sector;
- dual registration for Additional Support Needs specialists to enable them to work across the full age range.

One respondent suggests inclusion of a category for additional registration in Complex Additional Support Needs, noting that the Donaldson Review highlighted the current lack of recognition within education for the highly specialist teaching required for pupils with complex needs. The respondent notes that the review concluded that education fails to recognise, train and support teachers teaching pupils with complex needs, suggesting that this puts a duty on GTC Scotland to explicitly recognise and value teachers of pupils with complex needs.

One respondent expresses concern about maintaining standards, suggesting that additional specialisms be assessed and awarded by an external body, such as a university, rather than training provided by a local authority.

6.2.3 Comments expressing concern about the proposal

Stakeholder concerns

Colleges Scotland, along with five colleges, expresses concern about the proposal, stating that they believe that the Additional Support Needs specialism should be recognised by GTC Scotland. The respondents express specific concern about the arrangements for recognising Additional Support Needs qualifications for College lecturers, noting that they are not able to support the proposal until they can fully ascertain the impact of the proposal on the College sector workforce.

Colleges Scotland expresses further concern about the lack of clarity regarding how College staff within Additional Support Needs teams will be registered. The respondent notes that College lecturers are employed in Additional Support Needs teams to deliver specific support and learning to students with complex and diverse additional support needs, highlighting that this is central to their ability to develop unique programme content at appropriate SCQF levels. The respondent highlights the College sector's success in changing lives through programmes such as Work Readiness at SCQF Level 4. The respondent states that they consider Additional Support Needs to be a clear specialism requiring different knowledge and skills beyond the reasonable adjustments and differentiation required for all pupils/students.

Specifically, the College sector requests clarity on:

- the registration process for staff employed within Additional Support Needs teams;
- whether all 'enhanced' qualifications, including Additional Support Needs, will be applied equally across all categories of registration;
- whether the 'registration enhancement' system could limit or restrict teaching or unexpectedly or unintendingly impact working lives;

-
- whether a teacher registered under this category should be able to teach in other sectors, for example at Secondary level, if that is their age group of expertise.

The Educational Institute of Scotland expresses concerns about the proposal, stating that this may be perceived as a diminution in the status of the role. Specifically, the respondent questions the presumption of mainstreaming which states that all teachers are teachers of young people with additional support needs, noting that this does not mean that an Additional Support Needs specialism is not required. The respondent states that this stance is resulting in essential specialist support being unavailable for young people in school due to budgetary constraints, which is impacting negatively on learning and wellbeing of all children alongside being a major cause of work-related stress for teachers. The respondent states that while they welcome the inclusion of Additional Support Needs within the specialisms identified in the Lead Teacher Framework, they express disappointment that the value of the contributions made by teachers in these roles is not being recognised by the allocation of additional funding by the Scottish Government. The respondent states that their concerns would only be alleviated if another more effective mechanism were introduced to capture and value the Additional Support Needs specialism.

Children In Scotland note the breadth of pupil experience and express concern about the availability and suitability of training to meet the support needs for all pupils. The respondent states that GTC Scotland has a central role in ensuring teachers receive robust assistance to identify individual methods of support for children and are given practical help to utilise a range of learning techniques within the same lesson. Children In Scotland suggest a review of current delivery around additional support for learning in Initial Teacher Education to establish effectiveness for meeting pupil needs.

Edinburgh Steiner School and Drumduan School express concern about impact of the proposals on specialist staff, noting the potential for the proposals to exclude practitioners with extensive specific training, for example specialists in eurythmy, art, and music therapists, resulting in restrictions in the range of therapeutic and developmental offers within specialist curricula. The respondents state that they believe the category must remain and, if required, a list of recognised Additional Support Needs qualifications and professions created. They request clarity on whether highly skilled specialists would need a teaching qualification for employment, providing the example of whether a eurythmy teacher could be employed as a specialist within a Steiner school under their own professional body.

The Scottish Council for Independent Schools expresses concern about the potential impact on recruitment, particularly if appointing from outside Scotland. The respondent requests further clarity on the evidence base to justify the removal of the Additional Support Needs category.

Connect notes that there is currently no career pathway for teachers who want to teach Additional Support Needs, suggesting that the expertise of those working in this sector is mixed. The respondent suggests that while GTC Scotland registration could be one way forward on this, they question whether the proposal achieves this, without providing further detail.

Respondent concerns

Many respondents note the breadth of the Additional Support Needs sector and highlight the range of specialists who provide support to meet additional needs, including: occupational therapists, counsellors, educational psychologists, therapeutic eurythmy specialists, spatial dynamics movement therapists, anthroposophical art therapists, and speech therapists. As such, respondents question the requirement that all teachers have full registration, and therefore by default a mainstream teaching qualification, suggesting that this is rooted in a narrow and academic definition of learning support. These respondents raise strong concerns about the impact of the proposal on specialist staff, noting that this creates job insecurity for staff with therapeutic rather than educational qualifications. The respondents request clarity on how such specialists would be recognised by GTC Scotland along with a clear and full

rationale for the proposed change that recognises and includes educational approaches outwith mainstream provision.

Some respondents express concern that the proposal would dilute quality and amount of Additional Support Needs provision at a time when the numbers of learners with additional needs is increasing, particularly given the challenges over the last two years. These respondents state that they consider this to be a specialist role that requires recognition and suggest that this proposal would negatively impact on learners with additional needs. One respondent suggests that the proposal would significantly negatively impact the educational and emotional needs of vulnerable children.

Some respondents express concern about a lack of clarity about the proposal, specifically requesting clarity on:

- how GTC Scotland would ensure quality within specialist interventions, for example ensuring literacy and reading specialists have sufficient depth of knowledge;
- how ASN teachers working across the full age range would be registered;
- how currently Additional Support Needs registered teachers will maintain their single or dual ASN registration;
- how mandatory Additional Support Needs qualifications, such as Qualified Teacher of the Hearing Impaired and Qualified Teacher of the Visually Impaired, will be recognised;
- the difference between an Additional Support Needs registration category and the proposed Accredited Specialism Framework.

Respondents express further concern about:

- the potential to further exacerbate staff shortages within Additional Support Needs provision;
- the potential impact on job security for specialist staff if their roles are not protected;
- the potential for increased pressure on teachers to meet all needs of all learners without sufficient time, training, resources or knowledge.

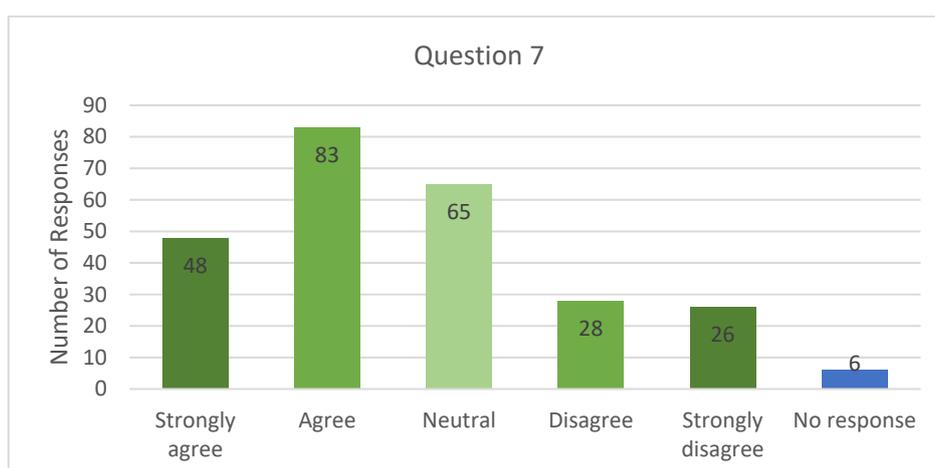
One respondent expresses concern about the perceived assumption that equates the Additional Support Needs specialism with other specialities, stating that this undermines additional support needs teaching and fails to recognise that there are specialist additional support needs classes and schools, and a specific additional support needs curriculum (The Milestones). Given the breadth and scope of the additional support needs sector, the respondent questions why they will no longer be able to have specific registration with their professional body that reflects their expertise, stating that GTC Scotland appear to be out of touch with the additional support needs and complex needs sector.

Q7: Once on the Register of Teachers, GTC Scotland propose to recognise a teacher’s qualifications in additional support needs, and other specialist areas through a process of registration enhancement.

7.1 Quantitative analysis

Responses to this proposal are divided, although there is a preference in support of the proposal. Just over half (51%) of respondents indicate that they either Strongly Agree or Agree with the proposal, with one quarter (25%) of respondents remaining neutral. Slightly over one-fifth (21%) of respondents indicate that they either Strongly Disagree or Disagree with the proposal.

When analysed by perspective, the majority of individual teachers (58%) support the proposal, with just over one-fifth (21%) remaining neutral. There is broad support across the other groups, with the majority of local education officers (80%), university lecturers (71%) and college lecturers (54%) supporting the proposal. Four of the five national educational bodies support the proposal. The groups indicating that they do not support the proposal are education stakeholders (33%), college lecturers (27%), university lecturers (28%), parents/carers (26%) and individual teachers (20%). One national educational body indicates that they Strongly Disagree to the proposal.



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	27%	27%	20%	20%	7%	0%
Education stakeholder	10%	0%	48%	33%	0%	10%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	19%	39%	21%	8%	12%	1%
Local authority	100%	0%	0%	0%	0%	0%
Local authority officer(s)	30%	50%	5%	10%	0%	5%
National educational body	40%	40%	0%	0%	20%	0%
Parent(s)/carer(s)	9%	0%	65%	9%	17%	0%
Student/pupil	0%	0%	67%	0%	0%	33%
University lecturer	14%	57%	0%	14%	14%	0%
Total	19%	32%	25%	11%	10%	2%

7.2 Qualitative analysis

7.2.1 Comments expressing support for the proposal

A few stakeholders express support for the proposal, stating that they believe this will make it easier for teachers to move in and out of the Additional Support Needs sector. The NASUWT and Education Scotland welcome the broadening of recognition of specialisms, indicating that this provides a positive recognition of Career Long Professional Learning and supports the new development of Lead Teacher roles and specialisms.

A few stakeholders express support with some caveats, with Drumduan School noting that they are supportive of registration enhancement only if the Additional Support Needs registration category remains, noting that this may be a useful mechanism to recognise additional skills and specialities. In contrast, the Educational Institute of Scotland expresses support for the proposal only if the Additional Support Needs registration category is removed. The respondent notes that if removed, registration enhancement may be an appropriate mechanism to recognise a teacher's specialism in Additional Support Needs. The Educational Institute of Scotland suggests that any altered arrangements be as inclusive as possible and enable recognition of all relevant qualifications and experience.

Children in Scotland welcomes the principle that a teacher's commitment to Additional Support Needs be recognised and have parity of esteem with other aspects of education. The respondent notes that this may go some way to supporting their call for numbers of specialised staff to increase in schools, may bolster staff morale and recognise the work many teachers do without current recognition. However, they also express caution, stating that the establishment of an 'accredited specialism' in Additional Support Needs should not dilute the need for all teachers to be well trained and supported in their ability to support all learner needs.

A few respondents express support for the proposal, stating that the proposal reflects the current Initial Teacher Education system, whereby all teachers are expected to have a basic grounding in Additional Support Needs, and is in line with inclusive practice principles. Respondents state that it is an enhanced role which requires additional specialist professional learning and note that the proposal aligns well with the Children and Young People's Workforce Knowledge and Skills Framework.

A few respondents express support, stating that it will support career pathways and portfolio development through recognition of further training and qualifications. One respondent suggests a review of Career Long Professional Learning (CLPL) opportunities to ensure availability of a range of professional training. A few respondents express cautious support but highlight the need for careful implementation to ensure that the proposal does not reduce the diverse and rich range of specialisms currently offered through blocking registration of experienced practitioners and specialists.

7.2.2 Suggestions about the proposal

The University of Edinburgh suggests inclusion of a separate enhanced registration category for Qualified Teachers of Deaf Learners and Qualified Teachers of Learners with Vision Impairment. The respondent states that this would recognise the additional specialist qualifications required by the Scottish Government, as stated in the Requirements for Teachers (Scotland) Regulations 2005.

The Educational Institute of Scotland suggests that the recognition of a specialism in Additional Support Needs should only be available once the registrant is on the Register of Teachers, noting that this will allow sufficient time for the teacher to develop their practice and pedagogy prior to specialising in one area. The respondent further suggests that recognition enhancement should consider practice experience rather than relying solely on qualifications. The respondent notes that highly experienced teachers and lecturers may be performing lead teacher roles in schools or departmental leads in colleges without necessarily having

undertaken a formal qualification in Additional Support Needs. The respondent therefore suggests that consideration be given to recognising experiential as well as qualified-based routes to developing area specialisms.

The NASUWT suggests that reassurance be offered to Additional Support Needs specialists that this is not an attempt to dilute recognition of their achievements.

A few respondents suggest extending the proposal to include other additional qualifications to ensure equity across the sector and enable teachers to fully represent the breadth of their training and knowledge. A few respondents further suggest coordination with universities to ensure their offers of certification reflect the needs of the education sector, suggesting provision of a list of recognised certifications on GTC Scotland's website. A few respondents suggest that there is a need for financial recognition commensurate with training and qualifications.

7.2.3 Comments expressing concern about the proposal

Stakeholder concerns

Colleges Scotland, along with five colleges, expresses concerns with the registration enhancement proposal, requesting further detail on scope and implementation to enable full assessment of potential impacts on the College workforce. The respondents state that they can only support the proposal if it is applied equally to all categories of registration to ensure recognition that teachers across all educational levels may have expertise in Additional Support Needs. They express concern about future impacts and interpretations, specifically whether the registration enhancement proposal could become limiting or restrictive. Respondents from across the College sector state that should there be a time when registered teachers in any category cannot teach certain things, or their working lives are otherwise unexpectedly impacted by this new 'registration enhancement' approach, this would not be supported by the College sector.

The Educational Institute of Scotland request clarity on whether those currently registered in the Additional Support Needs category will be deemed to meet the criteria for enhanced registration as an Additional Support Needs specialist or whether they would be required to re-apply to have their application considered.

Children In Scotland expresses concerns about the potential negative impact on the quality and availability of Additional Support Needs provision, noting that the needs of children with additional support needs are not always being met in Scottish education. The respondent refers to the 'Children in Scotland Manifesto for 2021-26', in which they highlight that the recent Independent Review of the Implementation of Additional Support for Learning found that Additional Support for Learning (ASL) is not visible or equally valued within Scotland's education system. They point to their recent 'Not Included, Not Engaged, Not Involved' research undertaken in partnership with Scottish Autism and the National Autistic Society in which they highlight the impact that the lack of support and specialist staff is having, particularly on children with additional support needs. The report highlights the experiences of autistic children who are experiencing unlawful exclusions and demonstrates the effect on their health, wellbeing and learning. The report resulted in a round table chaired by the Deputy First Minister with key autism stakeholders in 2019 and the establishment of an Autism in Schools Short-Life Working Group. The respondent notes that they have called for funding to support the holistic learning needs of children and young people, arguing that numbers of specialist and support staff in schools should return to 2010 levels. While welcoming the aims of the proposal for additional enhancement, Children In Scotland requests clarity on whether GTC Scotland intends to introduce targets for schools or local authorities regarding teachers with Additional Support Needs specialisms and, if so, how might this be monitored and supported.

The University of Edinburgh and Scottish Sensory Centre express concerns about the potential impact of the proposals on Qualified Teachers of Hearing Impaired and Qualified Teachers of the Visually Impaired. Both respondents suggest recognition of mandatory qualifications and different qualification levels, highlighting Scottish Government guidance recommending that teachers of learners with vision or hearing impairments obtain additional qualifications at Post Graduate Diploma Masters level SCQF 11 or above. The University of Edinburgh suggests a separate enhanced registration category for teachers of pupils with hearing or vision impairments, while The Scottish Sensory Centre suggests recognition of different qualification levels.

Drumduan School expresses concern about the removal of the Additional Support Needs registration category, noting that they support the proposal for registration enhancement only if the Additional Support Needs category remains. They further state that they only support the proposal if additional enhancement supports, rather than limits, the diverse range of available professional skills and specialisms.

The Scottish Council of Independent Schools expresses concern that the proposal does not accurately reflect the knowledge and skills of Additional Support Needs teachers, noting that this sector is much broader than other specialist areas that have received professional recognition. The respondent suggests that Additional Support Needs should be given equal status to Primary and Secondary registration.

Connect suggests that 'Additional' and 'Enhanced' registration makes any specialism an 'add on' rather than core area, noting that all teachers should be good teachers in their chosen field and then able to specialise in a subject area or in another aspect of teaching or leadership.

Respondent concerns

Many respondents express concern about qualification requirements, with some noting that the proposal does not reflect the diversity of Scottish education whereby many highly trained specialist staff working to support pupils, for example therapists and creative practitioners, do not have mainstream teaching qualifications. The same respondents therefore request clarity on whether specialist staff, many of whom work to support children with a broad range of additional support needs but do not hold mainstream teaching qualifications, will be able to receive full registration. The same respondents express concern about whether all current additional support staff will be able to automatically transfer their registration, noting the potential significant negative impact on staffing if mainstream teaching qualifications are a prerequisite to registration.

Some respondents express further concern about the focus on qualifications, noting the importance of both practice experience and alternative routes into Additional Support Needs teaching. A few other respondents express concern about professional standards within the Additional Support Needs sector, suggesting that enhancement should require specific qualifications to ensure Additional Support Needs teachers are sufficiently qualified.

Some respondents express scepticism about the intentions and potential impact of the proposals, suggesting that they will cause unnecessary bureaucracy, will not respect existing professional experience and will prove divisive. A few respondents express concern that the proposals will devalue the Additional Support Needs specialism and ultimately negatively impact on the number of Additional Support Needs teachers at a time when the numbers of children with additional needs is increasing. The same respondents request reassurance that the proposals will not undermine the level and quality of current Additional Support Needs provision.

A few respondents express concern about the proposed removal of the Additional Support Needs registration category, stating that it should have its own category to accurately reflect the level of expertise and practice required and ensure that it remains an attractive career path. A few respondents state that current training does not provide teachers with sufficient knowledge and expertise to work with either very young children or children with additional

needs, suggesting the development of a dual qualification to enable students to specialise in working with one of these groups.

A few respondents express concern about the lack of detail in current proposal, stating that further information is needed before they can take a view. Concerns expressed include:

- lack of clarity about the difference between registration enhancement and professional recognition;
- lack of clarity about what enhancement would look like for teachers;
- lack of clarity about incentives for enhancement;
- lack of detail on the Accredited Specialism Framework;
- lack of clarity about potential costs for a registrant.

A few respondents suggest that Scotland needs Additional Support Needs teachers who specialise in generalised support for learning, complex additional support needs or supporting Social, Emotional and Behavioural Difficulties (SEBD), and question how this proposal will encourage the development of these specialisms.

A few respondents express concern about the proposal stating that Additional Support Needs should not be seen as separate from main registration, questioning what would happen if a teacher did not meet the enhancement criteria. The same respondents state that Additional Support Needs should be incorporated into mainstream provision.

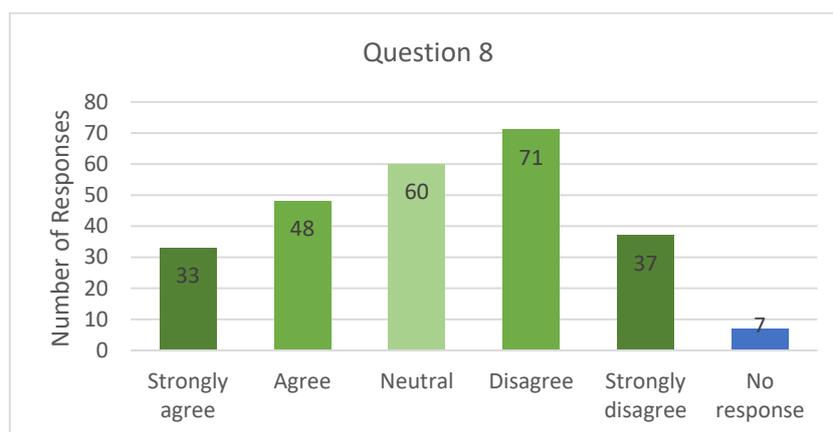
A few respondents express concern about consistency, questioning the logic of not allowing Primary and Secondary teachers to teach cross-sector while allowing Additional Support Needs teachers to teach whole classes rather than supporting individuals or small groups, noting that they view the roles of class teachers and additional support teachers to be completely different.

Q8: GTC Scotland propose that in order to protect the integrity of the Register of Teachers, the status of Provisional (Conditional) registration should no longer be issued.

8.1 Quantitative analysis

The responses to this proposal were divided but indicate a significant level of disagreement with the proposal. Just under one-third of respondents (32%) indicate that they either Strongly Agree or Agree with the proposal, with nearly one-quarter (23%) of respondents remaining neutral. A significant proportion (42%) of respondents indicate that they either Strongly Disagree or Disagree.

When analysed by perspective, responses from individual teachers are divided. Just under one-third (31%) of teachers support the proposal, with a similar proportion (29%) remaining neutral. A significant proportion (38%) of individual teachers do not support the proposal. Similarly, responses from university lecturers and college lecturers are also divided. There is however broad support from local authority officers (65%) and four of the five national educational bodies also support the proposal. The groups indicating that they do not support the proposal are parents/carers (91%), students/pupils (67%), education stakeholders (62%), university lecturers (43%), individual teachers (38%) and college lecturers (27%). One national educational body indicates that they Strongly Disagree with the proposal, and a small proportion (10%) of local authority officers indicate that they do not support the proposal.



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	20%	13%	40%	20%	7%	0%
Education stakeholder	5%	5%	14%	43%	19%	14%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	9%	22%	29%	24%	14%	1%
Local authority	0%	100%	0%	0%	0%	0%
Local authority officer(s)	45%	20%	20%	10%	0%	5%
National educational body	20%	60%	0%	0%	20%	0%
Parent(s)/carer(s)	9%	0%	0%	65%	26%	0%
Student/pupil	0%	0%	0%	67%	0%	33%
University lecturer	43%	14%	0%	14%	29%	0%
Total	13%	19%	23%	28%	14%	3%

8.2 Qualitative analysis

8.2.1 Comments expressing support for the proposal

One stakeholder expresses support for the proposal, noting that it would make it easier for teachers to move to Scotland and gain appropriate registration.

A few respondents express support, stating that the proposal would protect integrity of the register and maintain professional standards. A few respondents note that the proposal would simplify processes.

8.2.2 Suggestions about the proposal

Education Scotland suggest that existing support mechanisms for registrants with Provisional (Conditional) status continue and be developed further across the system, for example by Education Scotland colleagues, local authority CLPL leads and headteachers.

West College Scotland note that College lecturers use the Provisional (Conditional) category of registration to gain additional qualifications for teaching in Secondary or Primary school sectors. The respondent therefore suggests that alternative transition pathways be established before this category is removed.

A few respondents make specific suggestions, including that this should also apply to teachers in the University context, and that any 'conditional' status is not publicly available. One respondent suggests that rather than removal of the category, the Provisional (Conditional) status be time limited.

8.2.3 Comments expressing concern about the proposal

Stakeholder concerns

Colleges Scotland, along with two individual Colleges, expresses concern about the proposal. The respondents state that the Provisional (Conditional) category is used to support lecturers to 'top-up' their qualifications and move from registration as a lecturer in the Further Education category to registration in the Primary or Secondary categories. The respondents state that without the availability of another mechanism by which lecturers could undertake registration changes, the College sector is unable to support removal of the Provisional (Conditional) category.

The Educational Institute of Scotland expresses concern about the proposal, suggesting that the consultation paper has not outlined a compelling rationale to justify the removal of Provisional (Conditional) registration. The respondent details the purpose and development of the registration category, noting that this category supports registration of teachers in the independent sector and teachers qualified outside Scotland, and enables lecturers in the Further Education sector to transfer to another registration category. The respondent states that they understand this category of registration to be operating effectively and therefore questions the perceived threat to the integrity of the Register of Teachers. The respondent expresses further concern about the timing of this proposal, noting that with the introduction of mandatory registration of college lecturers along with the potential for increased applications from applicants qualified outside Scotland, the need for this registration status is likely to increase.

The Scottish Council of Independent Schools also questions the rationale underpinning the proposal, requesting evidence to support the suggestion that the Provisional (Conditional) category compromises the integrity of the Register. The respondent states that the category was created to assist with teacher recruitment shortages and suggests that this was a proactive and pragmatic solution, noting that this was agreed by the GTC Scotland Council.

Edinburgh Steiner School and Drumduan School express significant concern about the proposal. Edinburgh Steiner School provides a detailed history on the establishment of the Named School Only category of registration, noting that this was established in negotiation with GTC Scotland as part of the Provisional (Conditional) category of registration. The respondent expresses serious concern therefore about the proposal to remove the Provisional (Conditional) category of registration, noting that if the proposal were to affect the Named School Only category it would constitute a grave breach of trust that would seriously threaten the stability of Edinburgh Steiner School and damage the breadth of Scottish education. Specifically, both respondents seek:

- urgent assurance that the proposal will not threaten the Named School Only category;
- clear commitments that any Steiner teachers currently registered under the Named School Only category would not have their registration withdrawn as a result of these proposals;
- clarity about how teachers who have completed their full training in another country, and where they have been teaching for some time, would be registered;
- clarity about how teachers trained in Steiner education, either within or outside of Scotland, would be registered;
- clarity about how this proposal might affect the ability of school managers to employ specialist personnel who meet specific needs within their schools.

The Edinburgh Steiner Teacher Education programme expresses concern, noting that their current agreement with GTC Scotland is for teachers to work in any Steiner school in Scotland under a Named School Only arrangement. The respondent further notes that many teachers have not been able to complete this 3-year, part-time programme due to both delays in accreditation and the pandemic, suggesting that a 5-year extension is required to allow teachers to complete the programme and gain full registration. Respondents further state that if teachers are no longer able to undertake this qualification, there would no longer be any Scottish trained Steiner teachers and express serious concern about the potential detrimental impact on the independent school sector in Scotland.

Respondent concerns

Many respondents express serious concern about the impact of the proposal on teachers working outside of mainstream provision. These respondents note that the Named School Only category was created to reflect the full breadth of the Scottish education sector and express strong concern that removal of this category of registration will severely restrict representation of alternative models and pedagogies. Respondents state that a significant proportion of the workforce within the Steiner/Waldorf educational approaches do not come through mainstream training routes and are therefore registered under the Named School Only registration category. These respondents express concern that any changes to the Named School Only registration category, and the potential that staff will need to compete 'top up' qualifications prior to gaining employment, would have significant and devastating impacts on their ability to recruit staff. Many respondents emphasise the potentially devastating impact of removal of the Provisional (Conditional) registration category on their schools, noting that until teacher numbers are at a sustainable level the removal of this category would create more difficulty than its retention.

Many respondents express concern about the potential negative impact of the proposal for teachers with qualifications from outside of Scotland, noting the provision in Article 17 of the Public Services Reform (General Teaching Council for Scotland) Order 2011 to facilitate registration of internationally trained teachers within the Provisional (Conditional) category. Some respondents suggest that removal of this category will have a significant detrimental impact on diversity within the sector, particularly for language teaching and STEM subjects. A few respondents state that removal of this category suggests that teachers moving into

Scottish education from overseas would need to do a full probationary year before becoming fully registered. Respondents note the salary implications and request clarification.

A few respondents express concern about lack of detail in the proposals, specifically requesting clarity on whether the provisional registration applies during the probationary year.

A few respondents express concern about people currently registered under the Provisional (Conditional) category and request clarity on how their registrations will be transferred under the new system.

A few respondents express concern about full registration during the probationary year, suggesting that newly qualified teachers do not have sufficient practice experience and therefore their registration status should be provisional until completion of probation.

A few respondents express concern about the rationale that the proposal protects integrity of the register, noting that the integrity of the Register of Teachers is protected through reflective professional development and update of practitioners, Continuing Professional Development, ongoing development plans, peer feedback and observation, rather than through narrow categorisation. A few respondents also express concern that the proposal will limit the ability of GTC Scotland to review individual cases, thereby reducing the potential for people with exceptional circumstances to be registered.

One respondent expresses concern about the process for teachers seeking multiple registrations. The respondent notes that some teachers, particularly in all-through schools, contribute to different curricular phases and therefore may be registered for one phase while having provisional status for the other with registration pending. The respondent seeks clarity about how this process might continue.

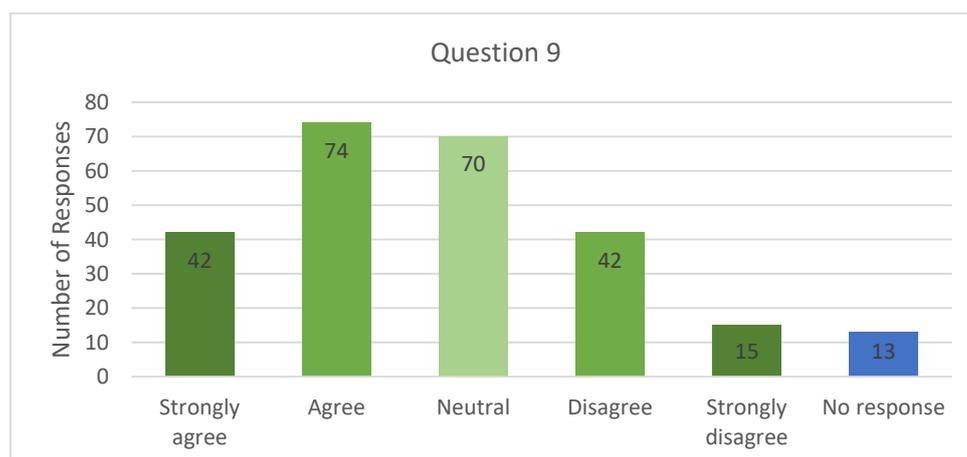
One respondent expresses concern about practitioners trained in England gaining full registration despite only having Early Years practice experience. The respondent requests clarification as to whether Early Years Only will be recognised.

Q9: GTC Scotland propose that the Full Registration (Associate) status is closed and that we review the practical operation of Professional Update to ensure it is fit for purpose.

9.1 Quantitative analysis

Responses to this proposal were divided, although there is a preference in support of the proposal. Although slightly less than half (45%) of respondents indicate that they either Strongly Agree or Agree with the proposal, over one-quarter (27%) provided a neutral response. Just over one-fifth (22%) of respondents indicate that they either Strongly Disagree or Disagree with the proposal.

When analysed by perspective, half of individual teachers (50%) support the proposal, with a further 30% remaining neutral. Similarly, the majority of local authority officers (80%) and university lecturers (58%) support the proposal. Over half (53%) of college lecturer responses are neutral, with the majority of the remaining responses (40%) indicating support. Four of the five national educational bodies support the proposal, with one remaining neutral. The groups that indicate that they do not support the proposal are parents/carers (83%), students/pupils (67%), education stakeholders (34%) and individual teachers (16%), university lecturers (14%), college lecturers (7%) and local education officers (5%).



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	20%	20%	53%	7%	0%	0%
Education stakeholder	5%	5%	29%	29%	5%	29%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	16%	34%	30%	10%	6%	3%
Local authority	0%	100%	0%	0%	0%	0%
Local authority officer(s)	45%	35%	15%	5%	0%	0%
National educational body	20%	60%	20%	0%	0%	0%
Parent(s)/carer(s)	0%	4%	9%	70%	13%	4%
Student/pupil	0%	0%	0%	67%	0%	33%
University lecturer	29%	29%	29%	0%	14%	0%
Total	16%	29%	27%	16%	6%	5%

9.2 Qualitative analysis

9.2.1 Comments expressing support for the proposal

A few stakeholders express general support for the proposal, noting that the current Associate status has little meaning. Education Scotland expresses support and welcomes the review of the practicalities associated with Professional Update, noting that this is aligned with the withdrawal of Associate status. The NASUWT notes that it understands the rationale for the proposal but requests further detail before being able to provide full endorsement.

A few respondents express support for the proposed review of Professional Update. These respondents state that Professional Update is unnecessarily bureaucratic, does not meet the requirements of the profession and is not ‘fit for purpose.’

A few respondents express support for the proposal to close the Associate status, stating that anyone wishing to remain on the register should be engaged in teaching.

9.2.2 Suggestions about the proposal

Education Scotland suggests that consideration be given to the capacity of the system to manage the proposed changes. The University of Edinburgh notes that it will be important to ensure the integrity of Professional Update is maintained and suggests that its core purpose remains focused on development rather than performance.

A few respondents make suggestions about Professional Update, including that any new system:

- is a robust, teacher-driven Professional Review and Development (PRD) system that is linked to competency, conduct and professional knowledge;
- is coordinated with professional learning opportunities offered by universities so that Career Long Professional Learning (CLPL) offers meet professional needs;
- is streamlined, easy to navigate and recognises professional competency;
- takes into account the varying circumstances and roles of the teaching profession, including supply staff and retired teachers;
- increases teachers’ commitment to professional learning;
- ensures consistency, for example through combining the two systems currently used to record Continuing Professional Development (MyPL and Gateway) to ensure consistency across Scottish Education;
- engages with leadership in Higher Education to support staff working in this sector to actively engage in Professional Update.

9.2.3 Comments expressing concern about the proposal

Stakeholder concerns

A few stakeholders, including the Educational Institute of Scotland, the NASUWT and the University of Edinburgh, express concern about the lack of detail in the proposal. These respondents state that without provision of detail about the practical operation of Professional Update, they cannot comment on the proposal to remove Associate status. The NASUWT specifically requests more detail on ‘the intention... to ensure that Professional Update itself accommodates and recognises different circumstances.’

A few stakeholders, including the Educational Institute of Scotland, the Scottish Sensory Centre and Drumduan School, express concern about the impact of the proposal on people currently registered in this category, including retired teachers, people on career breaks and those working in other areas, for example Higher Education. These respondents note that closure of the Associate category may negatively impact on the available pool of supply staff, which is particularly an issue in rural areas.

Respondent concerns

Many respondents express concern about the potential negative impact on people currently eligible for Associate status, including retired teachers, people on career breaks, people working overseas, or people working in other areas of education. These respondents note that this may have a negative impact on the availability of supply teachers and create barriers to people returning to teaching after a career break, after a period working overseas or period in other sectors. Many respondents express concern that closure of the Associate status would negatively affect their ability to recruit specialist and supply staff. A few respondents question the timing of the proposal to remove any registration categories at a time of ongoing sector-wide staff shortages, suggesting that the rationale for the proposal is to simplify administrative processes rather than responding to the needs of the sector. A few respondents express further concern that the proposal will ultimately restrict diversity across the Scottish education system.

A few respondents express concern that the proposal to adapt Professional Update is not relevant for people with Associate status, suggesting that it is unrealistic to expect registrants to be involved in the Professional Update process if they are not currently working in the Scottish educational system. A few respondents suggest that the proposal is discriminatory against people who may have to temporarily leave teaching due to life circumstances and suggest that rather than being removed from the register they should instead be expected to meet requirements when they return to teaching.

A few respondents express concern about the lack of detail in the proposal, noting that Associate registrants need to know how GTC Scotland proposes to address the issue of the Professional Update before any decision about the proposal is made.

A few respondents question the need to review the Professional Update process, noting that registrants have only just got used to the current professional update processes and that they believe it to be in line with many other regulated professions. In contrast, a few respondents express concern about the efficacy of the current Professional Update process, stating that it is ineffective and open to error.

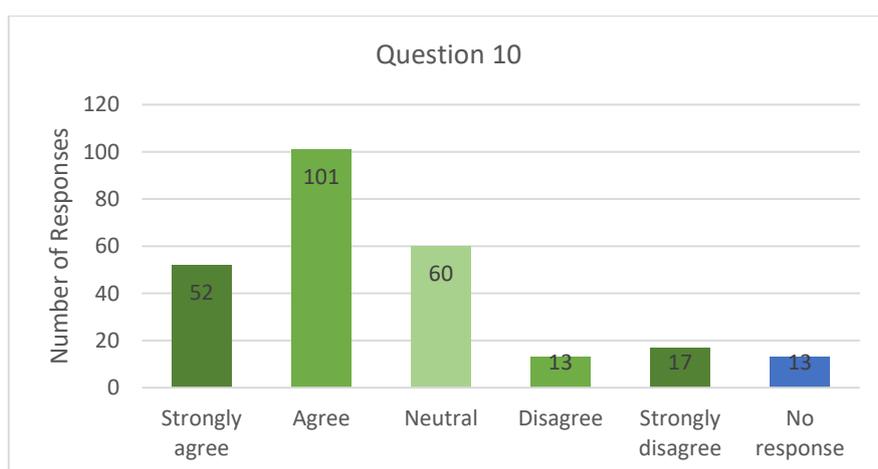
A few respondents express concern that Associate status is used by local authorities to encourage staff to complete the Professional Update process, requesting clarity about whether failure to engage in the Professional Update process would result in removal from the register. These respondents also request clarity on what may replace this category, noting that Associate status is a useful interim measure used by local authorities during recruitment processes.

Q10: GTC Scotland propose that there are two registration status for the Primary Education and Secondary subject education categories of registration: Provisional Registration and Full Registration.

10.1 Quantitative analysis

Responses to this proposal are broadly supportive. Over half of respondents (59%) indicate that they either Strongly Agree or Agree with the proposal. Just under one-quarter (23%) provided a neutral response. A small proportion (12%) of respondents indicate that they either Strongly Disagree or Disagree with the proposal.

When analysed by perspective, the majority (67%) of individual teachers support the proposal, with 16% remaining neutral. All university lecturers and local authority officers support the proposal, along with the majority (54%) of college lecturers. Four of the five national educational bodies indicate support for the proposal. The majority (74%) of parents/carers and students/pupils (67%) remain neutral. Similarly, the majority (76%) of education stakeholders either did not respond to the question or provided a neutral response. One national educational body does not support the proposal along with a small proportion of parents/carers (17%), education stakeholders (15%) and individual teachers (14%).



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	27%	27%	40%	0%	0%	7%
Education stakeholder	10%	0%	43%	10%	5%	33%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	19%	48%	16%	6%	8%	3%
Local authority	100%	0%	0%	0%	0%	0%
Local authority officer(s)	40%	60%	0%	0%	0%	0%
National educational body	20%	60%	0%	0%	20%	0%
Parent(s)/carer(s)	0%	9%	74%	4%	13%	0%
Student/pupil	0%	0%	67%	0%	0%	33%
University lecturer	71%	29%	0%	0%	0%	0%
Total	20%	39%	23%	5%	7%	5%

10.2 Quantitative analysis

10.2.1 Comments expressing support for the proposal

A few stakeholders, including the University of Edinburgh, express general support for the proposal, noting that it will provide clarity for the Register. The NASUWT expresses support, although requests further detail before providing full endorsement.

A few respondents express general support, noting that the proposal would streamline registration and improve transparency. A few respondents express cautious support, suggesting that further clarity is needed on category classifications and the re-registration process.

10.2.2 Suggestions about the proposal

A few respondents make suggestions, including:

- that Provisional and Full registration categories should apply to teachers in all categories;
- that there should be a category for students to ensure thorough fitness to teach processes and maintain quality;
- that there should be a longer probationary period, suggesting 18 months to 2 years.

10.2.3 Comments expressing concern about the proposal

Stakeholder concerns

A few respondents, including the Scottish Council of Independent Schools, the Educational Institute of Scotland and Drumduan School, express concern about removal of Provisional (Conditional) registration, noting that this provides flexibility particularly for those teachers who have qualified outside Scotland. The Educational Institute of Scotland states that despite close monitoring, it is unaware of any evidence to suggest that the integrity of the Register of Teachers is compromised by the existence of the Provisional (Conditional) Registration status.

Drumduan School expresses further concern that the Primary category encompasses ages 7 to 14 to ensure applicability for independent schools and specialist teachers.

Respondent concerns

Many respondents express concern about the impact on all-through schools, requesting clarity on whether the Primary category will encompass the 7 to 14 age range.

A few respondents request urgent clarification about the Named School Only category, noting that this is currently within Provisional (Conditional) registration. These respondents express concern about job security for teachers in post with Provisional (Conditional) registration, and consequently the operation of schools which are reliant on this registration category. These respondents question the statement that the Provisional (Conditional) registration is 'interim' and with only a few registrants, noting that these registrants are clustered within specific institutions and bring a diverse range of specific specialisms. The same respondents express serious concern about the removal of the Provisional (Conditional) category, noting the severe operational difficulties this would cause for their schools and the negative impact on diversity and inclusivity. A few respondents state that the proposal fails to reflect the whole education system, suggesting that GTC Scotland is therefore working against its own mission to represent the whole of Scottish education.

A few respondents express concern about lack of clarity, including how the current proposal differs from current arrangements and the expectations related to Provisional registration.

A few respondents express concern about the proposal, noting that the Associate category should not be removed until the proposals have been published and fully consulted upon.

A few respondents express general concern about the proposal, suggesting that there should be one registration category only.

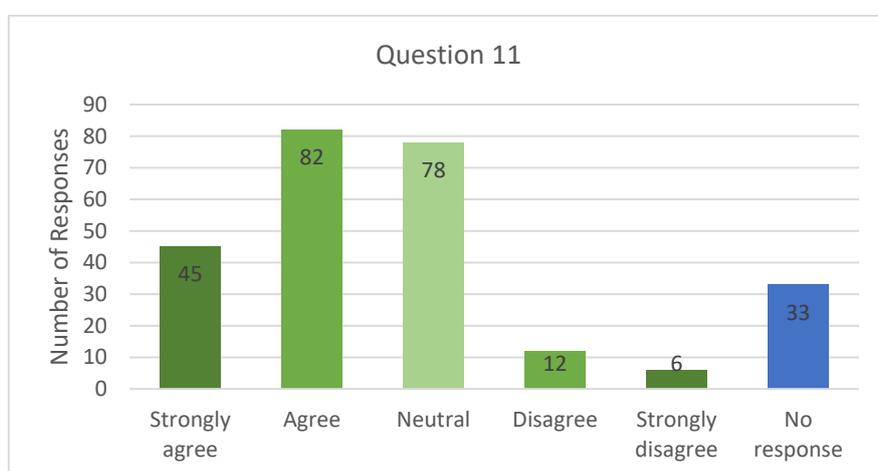
One respondent expressed a general concern about the MSc Transformative Learning and Teaching category, without providing further details.

Q11: GTC Scotland propose to broaden the scope of teaching qualifications that meet registration criteria in the category of further education.

11.1 Quantitative analysis

Responses to this proposal are broadly supportive. Half of respondents (50%) indicate that they either Strongly Agree or Agree with the proposal. Slightly under half (43%) provided either a neutral response or did not provide an answer. A small proportion (7%) of respondents indicate that they either Strongly Disagree or Disagree with the proposal.

When analysed by perspective, there is support for this proposal across all groups. The majority of university lecturers (86%) and college lecturers (60%) support this proposal, with all other responses remaining neutral. Similarly, half of individual teachers (50%) and local authority officers (50%) support the proposal with only a small proportion (9% and 20% respectively) of respondents indicating that they disagree. No other groups indicate that they disagree with the proposal.



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	27%	33%	40%	0%	0%	0%
Education stakeholder	43%	14%	10%	0%	0%	33%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	16%	34%	33%	5%	4%	8%
Local authority	0%	100%	0%	0%	0%	0%
Local authority officer(s)	10%	40%	30%	20%	0%	0%
National educational body	20%	60%	20%	0%	0%	0%
Parent(s)/carer(s)	4%	13%	39%	0%	0%	43%
Student/pupil	0%	0%	0%	0%	0%	100%
University lecturer	43%	43%	14%	0%	0%	0%
Total	18%	32%	30%	5%	2%	13%

11.2 Qualitative analysis

11.2.1 Comments expressing support for the proposal

Colleges Scotland, along with seven colleges, welcomes the proposal to broaden the scope of teaching qualifications that meet registration criteria for college lecturers, noting that this would more fully represent the range of qualifications, skills and experiences of college lecturers. The respondents reiterate however their opposition to using the name of 'Further Education'. West College Scotland note that new vocational pathways that lead to a refreshed College Teaching Qualification would be a positive step in realising parity of esteem between vocational and academic qualifications.

The Scottish Sensory Centre expresses support, suggesting that this will ensure that students in College are taught by staff who are appropriately qualified. The respondent notes however that there is a need for a separate category to ensure that this is not seen as an easier or alternative route to teaching in schools.

The Educational Institute of Scotland welcomes the proposal provided that the process will ensure that admission standards are not diluted. The respondent states that the ability of GTC Scotland to recognise equivalent or comparable qualifications will ensure that admission standards are maintained whilst recognising the diverse range of alternative routes into the profession. The respondent further suggests that the proposal would ensure that those who have equivalent qualifications which have been undertaken in recognised Scottish institutions will be given equal access to the Register as those with equivalent teaching qualifications obtained outwith Scotland.

A few respondents express general support, noting that this is in line with the Alison Wolfe report in England that those qualified in Further Education should be eligible to teach in Secondary. A few respondents suggest that this would improve the depth and breadth of the pool of qualified teachers, increase Continued Professional Development opportunities for registrants, and enhance the Senior Phase curriculum in partnership with Secondary.

11.2.2 Suggestions about the proposal

Colleges Scotland notes that GTC Scotland will be aware that the Scottish Funding Council review, supported by the Scottish Government, has identified two pathway models for exploring more joined up and integrated tertiary approaches across both college and university sectors. Colleges Scotland further notes that TQFE as the single qualification that is recognised in the context of UHI is equally pertinent when considering and acknowledging the increasing and deepening collaborations across the whole tertiary system. The respondent suggests therefore that any changes need to be carefully considered in the context where colleges are one of two sectors in the tertiary landscape and not school education.

Bòrd na Gàidhlig suggests developing greater delivery through the medium of Gaelic within the Further Education sector. The respondent notes that they have proposed an inter-organisation consultation for any new registration framework for Scotland and propose that Sabhal Mòr Ostaig and other relevant Further Education providers are included as consultees.

A few respondents suggest that the broadening of qualifications should be done on a subject-by-subject basis to respond to demand and that this proposal should be extended to Preparatory, Primary and Secondary teachers. One respondent notes that Qualified Teacher Status (via work placement/assessment only) in England and Wales are fully recognised qualifications, suggesting that they be recognised qualifications in Scotland. One respondent suggests that this proposal consider teachers with international qualifications and experience, suggesting that internationally qualified teachers currently experience barriers to registration.

11.2.3 Comments expressing concern about the proposal

Stakeholder concerns

Colleges Scotland, along with two colleges, expresses concern about the 'subject specialism' language being adopted in the New Registration Rules draft, under section 3.2 (Academic or Vocational Qualification Requirements). The respondents suggest that this language be replaced with 'degree area' or similar wording to avoid any implication that a specialism is required to be a registered lecturer.

Colleges Scotland and the Educational Institute of Scotland express concern about the requirement that an applicant 'hold the highest level of qualification available in the United Kingdom for their particular subject specialism,' noting that this is unfairly restrictive as the timeframe to which this applies is not specified. The respondents highlight there may now be HND and degree qualifications which did not exist at the time of original training or qualification, and therefore they suggest that any implication that registrants should complete the now 'highest' level of qualification to register is discriminatory and an unfair burden on prospective registrants.

Colleges Scotland expresses further concern about the potential requirement for additional qualifications for college lecturers beyond the requirements relating to the TQFE. The respondent notes that the TQFE is the teaching qualification which allows registration with GTC Scotland, and it has clear pathways and academic entry requirements. The respondent expresses concern that the framework which allows GTC Scotland to assess teaching qualifications for equivalency to TQFE be fair, transparent and at no point seek to bring in higher requirements than those which exist within the pathway to TQFE.

Glasgow Clyde College expresses concern that other qualifications, for example PGCE, be recognised as providing the same level of skills and knowledge as TQFE. The respondent suggests that there should be no need for someone with a TQFE equivalent qualification to undertake TQFE so they can be GTC Scotland registered.

The Educational Institute of Scotland expresses concern about the drafting of Schedule 2, paragraph 3.2, noting that this is an additional requirement which has been included in the Registration Rules. The respondent questions why the inclusion of these additional academic or vocational qualification requirements is necessary.

The Educational Institute of Scotland expresses further concern that, as currently drafted, it is proposed that the applicant seeking registration under the provisions of Schedule 2 must, in addition to a teaching qualification, also hold 'the highest level of qualification available in the UK for their particular subject specialism'. A list of qualifications is then provided. The EIS states that this requirement may impose a barrier to registration by replicating provisions which are contained in Annex C of the 2006 Professional Standards for Lecturers in Scotland's Colleges. The EIS states that, the College Lecturer Registration Working Group (CLRWG) has already recommended in a report to the Scottish Government that Annex C should be reviewed to take cognisance of and reflect the fact that some experienced lecturers may, through no fault of their own, not have undertaken one of the qualifications in the specified list. The respondent notes that the group acknowledged that in assessing entry to TQFE, consideration should not be confined solely to formal academic qualifications obtained but that evidence of the applicant's experience and existing qualifications should be considered and mapped against entry requirements to determine if the applicant had the requisite skills and experience to undertake the TQFE. The respondent expresses concern however that proposals in the GTC Scotland consultation paper appear to perpetuate the issues identified as barriers in Annex C and will therefore further impede the registration process.

Respondent concerns

A few respondents express concern that the proposal could become a potential mechanism by which to remove subject specialism through enabling someone to register in the Further

Education category, then move into Secondary teaching at senior phase. A few respondents express concern about potential impact on employment and career development opportunities for Secondary school staff, suggesting that this proposal be facilitated with appropriate Continuous Professional Learning (CPL) for secondary colleagues to ensure the employment and opportunities stay with school staff.

A few respondents express concern that broadening the entrance requirements may dilute skills and abilities within the teaching profession, resulting in a negative impact on quality and retention. A few respondents request more detail to enable them to fully assess how this proposal would maintain current standards.

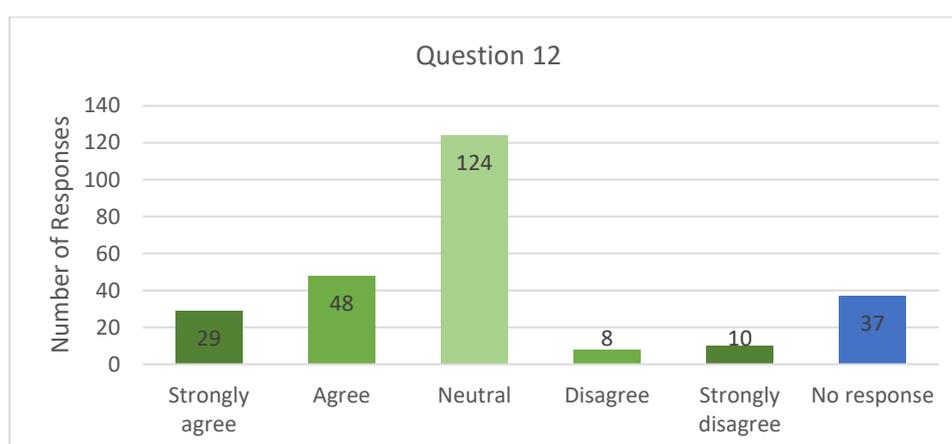
A few respondents express concern about further widening of entrance requirements, suggesting that some current University qualifications are not producing probationers ready to teach under current entrance standards, so express concern that the proposals would further dilute quality.

Q12: GTC Scotland propose that a transitional/grandparenting arrangement is put in place for the onboarding onto the Register of Teachers of the lecturing workforce employed on and prior to 1 April 2019.

12.1 Quantitative analysis

A significant proportion (62%) of responses to this proposal are either neutral or no response was provided. Of the remaining responses, 30% either Strongly Agree or Agree to the proposal. A small proportion of respondents (7%) indicate that they do not support the proposal.

When analysed by perspective, and excluding the neutral responses, it is possible to identify broad support across all groups. The groups most supportive of the proposal are university lecturers (71%), college lecturers (40%), local authority officers (40%), education stakeholders (29%) and individual teachers (29%). Three of the five national educational bodies indicate that they support the proposal, with the other two remaining neutral. The groups that do not support the proposal are college lecturers (33%) and education stakeholders (19%). One local authority indicates that they Strongly Disagree with the proposal. A small proportion of parents/carers (8%) and individual teachers (4%) do not support the proposal.



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	33%	7%	27%	33%	0%	0%
Education stakeholder	24%	5%	24%	5%	14%	29%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	7%	22%	58%	1%	3%	10%
Local authority	0%	0%	0%	0%	100%	0%
Local authority officer(s)	10%	30%	55%	0%	0%	5%
National educational body	20%	40%	40%	0%	0%	0%
Parent(s)/carer(s)	4%	4%	35%	4%	4%	48%
Student/pupil	0%	0%	0%	0%	0%	100%
University lecturer	57%	14%	29%	0%	0%	0%
Total	11%	19%	48%	3%	4%	14%

12.2 Qualitative analysis

12.2.1 Comments expressing support for the proposal

Colleges Scotland, along with five colleges, welcome the proposed Interim Registration Category and development of appropriate transition arrangements for the existing lecturer workforce to become registered with GTC Scotland.

The Educational Institute of Scotland welcomes proposals to create transitional/grandparenting arrangements to facilitate the registration of those lecturers who are currently in the sector. The respondent notes that adoption of transitional provisions is a well-established procedure and one which was adopted by GTC Scotland when teachers in the independent school sector were required to register.

A few respondents express support for the proposal, stating that such transitional arrangements are essential and that grandparenting arrangements ensure inclusivity and diversity.

12.2.2 Suggestions about the proposal

Colleges Scotland, along with five colleges, suggests a revision of the proposed implementation date to 1st April 2022. Colleges Scotland provides a detailed rationale for this change, including reference to discussions held by the College Lecturer Registration Working Group (CLRWG), noting that a change in date is necessary to ensure that the proposal includes the entire college lecturer workforce.

Education Scotland suggest that effective and clear communication of the transition arrangements and timescales is needed for those affected.

12.2.3 Comments expressing concern about the proposal

Stakeholder concerns

Colleges Scotland, along with four colleges, expresses serious concern about the proposed implementation date of 1st April 2019. The respondents state that this would mean that the grandparenting scheme would be partial and not applicable to all college lecturers currently employed within the sector. The respondents note that the proposed date comes from a National Joint Negotiating Committee (NJNC) Circular 03/18 relating to pay (salary placement) rather than the gaining of teaching qualifications. The respondents therefore suggest that proceeding with the 1st April 2019 date would be both arbitrary and discriminatory to lecturing staff.

Glasgow Clyde College expresses concern about the proposal, stating that interim registration should not be a way of deferring indefinitely the need to transition to a fully qualified lecturer workforce. The respondent highlights the commitments made in National Joint Negotiating Committee Circular 03/18 to transition to a fully qualified workforce and the current extreme demand for TQFE which is severely restricting access. The respondent expresses concern about availability of funding, noting that it is critically important to ensure that funding is in place to enable all lecturers with interim registration to move to full registration within a reasonable timescale.

The Educational Institute of Scotland expresses similar concern about the proposed date and questions the provided rationale. The respondent suggests that in the interest of fairness and equity, the transitional arrangements apply to all lecturers working in the sector prior to 4th April 2022, providing extensive details on the legal basis for this date. The respondent questions the proposed 1st April 2019 date, suggesting that the National Joint Negotiating Committee (NJNC) Circular 03/18 relates solely to pay and there is no link between these provisions and the contractual requirements for college lecturers to register with GTC

Scotland. The respondent suggests that to seek to link pay provisions with a date for mandatory registration is arbitrary and unfair, providing extensive detail to justify this view. The respondent further notes that due to the TQFE backlog many lecturers will be unable to enrol in TQFE through no fault of their own, suggesting therefore that provision be made under Rule 5 to allow GTC Scotland to extend the time for interim registration, where it is considered appropriate.

One stakeholder seeks reassurance that only suitably qualified and competent staff with appropriate professional values would be able to enter the teaching profession, stating that this is not clear within the current proposals.

Respondent concerns

A few respondents express concern about the commitments made in the National Joint Negotiating Committee Circular 03/18, suggesting that these are historically significant commitments to transition to a fully qualified lecturer workforce. The respondents express concern that interim registration should not be a way of deferring indefinitely the need to transition to a fully qualified lecturer workforce. The respondents suggest that there needs to be a national framework in place to provide the funding to enable all lecturers in Scotland to access training and become professionally qualified within a reasonable timescale.

A few respondents express concern about the lack of detail in the proposal and request further information in accessible language. A few respondents express scepticism about motives and seek reassurance about the mechanisms for quality assurance in Further Education to ensure the proposal does not dilute quality.

A few respondents express concern about the proposed timescale and start date, specifically that the proposed date of 2019 is not appropriate and that it should go back for a minimum of 5 years.

A few other concerns include:

- that the grandparenting arrangement only applies to the lecturing workforce, suggesting that this should apply to teachers in all registration categories;
- that this should ensure transition to full qualification;
- whether use of the term 'grandparenting' is appropriate, suggesting that this may be a discriminatory term;
- that placing restrictions on lecturers will put people off entering Further and Higher Education and reduce diversity of experience in Scottish universities.

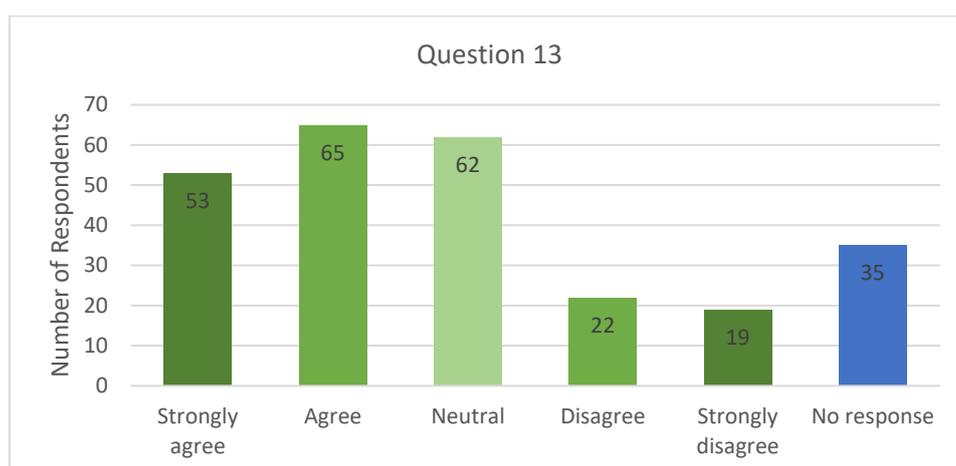
One respondent expresses concern about the effectiveness of transitional/grandparenting arrangements, noting that the experience of these in Primary, Preparatory and Secondary education is that they are ill-defined in extent and duration. This respondent expresses concern about the lack of effective access to Professional Update for Provisional (Conditional) Registrants, noting that this is contrary to the two-strand approach intended by Article 17 of the Public Services Reform (General Teaching Council for Scotland) Order 2011.

Q13: GTC Scotland propose that any lecturer appointed on or after 1 April 2019 will require a recognised or validated teaching qualification for entry to the Register of Teachers as a teacher of further education.

13.1 Quantitative analysis

Responses to this proposal were divided, although there is a preference in support of the proposal. Just under half of respondents (46%) indicate that they either Strongly Agree or Agree with the proposal. Just over one third (38%) provided either a neutral response or did not provide an answer. A small proportion (16%) of respondents indicate that they either Strongly Disagree or Disagree with the proposal.

When analysed by perspective, the groups indicating support for the proposal include university lecturers (86%), local authority officers (75%), college lecturers (67%) and individual teachers (49%). Four of the five national educational bodies agree with the proposal with the one remaining body remaining neutral. The main groups that do not support the proposal are education stakeholders (52%) and college lecturers (27%). A small proportion of university lecturers (14%), individual teachers (14%), parents/carers (13%) and local authority officers (5%) indicate that they either Disagree or Strongly Disagree with the proposal.



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	47%	20%	7%	27%	0%	0%
Education stakeholder	0%	5%	14%	14%	38%	29%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	20%	29%	29%	8%	6%	9%
Local authority	100%	0%	0%	0%	0%	0%
Local authority officer(s)	45%	30%	15%	5%	0%	5%
National educational body	0%	80%	20%	0%	0%	0%
Parent(s)/carer(s)	0%	4%	35%	4%	9%	48%
Student/pupil	0%	0%	0%	0%	0%	100%
University lecturer	57%	29%	0%	14%	0%	0%
Total	21%	25%	24%	9%	7%	14%

13.2 Qualitative analysis

13.2.1 Comments expressing support for the proposal

A few stakeholders express support for the proposal, with one stakeholder noting the importance of recognising appropriate teaching qualifications achieved outside Scotland.

A few respondents express support for the proposal, suggesting that this would ensure consistency across all teaching and learning environments, ensure fairness of pay, and assure quality of provision.

13.2.2 Suggestions about the proposal

Education Scotland suggests that enhanced communication of the requirements is required. The Educational Institute of Scotland suggests that, given the current backlog in accessing TQFE and the resulting barriers for newly appointed college lecturers to progress their application for registration, a combined multi-agency approach is adopted to provide a solution to these issues. The respondent suggests:

- An NJNC agreement is reached by which registration for this group of lecturers can be obtained either through completion of an agreed specified number of teaching hours in a college setting, which will constitute sufficient teaching experience for Provisional (Conditional) registration purposes, or on successful completion of a recognised teaching qualification, whichever comes first;
- Agreement with GTC Scotland that for a limited period of five years, they will provide Provisional (Conditional) Registration to those who have completed the agreed teaching experience, on the basis that an agreed timeframe has been provided within which TQFE will be undertaken;
- Over the 5-year period, work continues to address the issues of TQFE access, including: the work outlined in the report sent to the Scottish Government from the CLRWG in December 2020; regular reviews of the progress; and a commitment of ring-fenced resources from the Scottish Government to fund TQFE provision;
- Rules to be revisited in 5 years.

A few respondents suggest:

- that appointment staff without prior teaching registration should be allowed, providing completion of training occurs within a given timeframe;
- that this should only include Qualified Teacher Status assessment;
- inclusion of a defined timeframe by which to achieve qualification as part of conditions of employment;
- the rule should be from the year of implementation with all registered prior to this able to do a specific GTC Scotland course to validate their license.

13.2.3 Comments expressing concern about the proposal

Stakeholder concerns

Colleges Scotland, along with seven colleges, expresses concern about the proposed start date, stating that the 1st April 2019 date is inappropriate and arbitrary. The respondents suggest that any lecturer appointed on or after 1 April 2022 should require a recognised or validated teaching qualification for entry to the Register of Teachers as a teacher of further education, noting that this would support transitional arrangements for those already working in the sector.

Glasgow Clyde College expresses concern about the proposed date, noting that this would create three groups of staff: interim registrants; full registrants; and those outside of the

register due to not having TQFE. The respondent suggests that a later date of introduction, for example April 2022, would initially reduce the size of the latter category. The respondent expresses further concern about access to TQFE, noting that the remission arrangements for TQFE agreed as National Bargaining create a barrier to getting high numbers of staff qualified.

Respondent concerns

A few respondents express concern about the proposed date, noting that this should be a future rather than retrospective date.

A few respondents express concern about the potential impact on guest lecturers and industry specialists, noting that the proposal may create a barrier to people from the able trades and craftworkers to enter Further Education. Respondents highlight the valuable contribution of specialists and suggest that the proposal would restrict diversity of knowledge and experience, negatively impacting on quality and diversity of provision across further and higher education. These respondents express further concern that guest lecturers should not be required to have a teaching qualification.

A few respondents express concern about the rationale underpinning the proposal, noting the different pedagogies for teaching adults and children, and suggesting that teaching of adults requires diversity of expertise and knowledge, not just teaching ability.

One respondent expresses concern about quality assurance, noting that having a teaching qualification does not guarantee good practice.

One respondent expresses concern about consistency, suggesting that this proposal contradicts the proposal for individuals registered in the category of Secondary Subject Education and questions why this is necessary when some staff are already registered in the category of Education with Nursing and Midwifery Council.

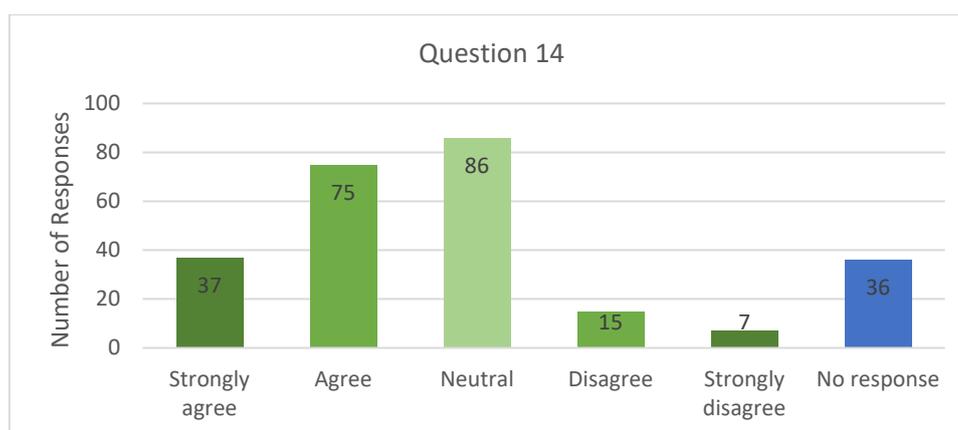
One respondent expresses concern about job security, noting that they believe that this proposal would result in them losing their job.

Q14: GTC Scotland propose that there are two registration status for the Further Education category of registration: Interim Registration and Full Registration.

14.1 Quantitative analysis

Responses to this proposal are broadly supportive. Slightly under half (43%) of respondents indicate that they either Strongly Agree or Agree with the proposal however a similar proportion (48%) provided either a neutral response or did not provide an answer. Only a small proportion (9%) of respondents indicate that they either Strongly Disagree or Disagree with the proposal.

When analysed by perspective, the groups indicating support for the proposal include all university lecturers (100%), local authority officers (85%), college lecturers (47%) and individual teachers (44%). Four of the five national educational bodies agree with the proposal with the one remaining body not providing a response. A significant proportion of individual teachers (50%), education stakeholders (57%), parents/carers (86%), and all students/pupils (100%), either remain neutral or do not provide a response. The main groups that do not support the proposal are college lecturers (33%) and education stakeholders (29%). A small proportion of individual teachers (7%) and parents/carers (4%) indicate that they either Disagree or Strongly Disagree with the proposal.



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	20%	27%	20%	33%	0%	0%
Education stakeholder	14%	0%	24%	19%	10%	33%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	12%	32%	41%	4%	3%	9%
Local authority	0%	100%	0%	0%	0%	0%
Local authority officer(s)	40%	45%	10%	0%	0%	5%
National educational body	0%	80%	0%	0%	0%	20%
Parent(s)/carer(s)	0%	9%	43%	0%	4%	43%
Student/pupil	0%	0%	0%	0%	0%	100%
University lecturer	57%	43%	0%	0%	0%	0%
Total	14%	29%	34%	6%	3%	14%

14.2 Qualitative analysis

14.2.1 Comments expressing support for the proposal

Colleges Scotland, along with six colleges, expresses strong support for the proposal to have Interim and Full Registration available for the Further Education category, with the caveat that the category be renamed College Education and that Interim Registration be applicable to those employed as lecturers in Colleges prior to 1st April 2022.

A few respondents express support for the proposal, noting that it is a welcome development for GTC Scotland to be responsible for registration and regulation of College lecturers in Scotland and that a requirement for Interim Registration ensures competence.

14.2.2 Suggestions about the proposal

Dundee and Angus College suggest retention of Provisional (Conditional) Registration to ensure lecturers wishing to top-up their qualifications to become registered Primary or Secondary teachers have a clear and supportive route through registration categories.

A few stakeholders make the following suggestions:

- 3-year timeframe for becoming fully qualified;
- enable anyone with an appropriate teaching qualification from outside Scotland to move to full registration as soon as practicable;
- Interim Registration be applied to lecturers employed in the sector before 1st April 2022.

A few respondents suggest that the rules should be the same as schools to minimise overcomplication and that if lecturers were employed without a teaching qualification, they could be employed on the basis of receiving training towards such a qualification.

Two respondents provide contrasting suggestions about timeframes, one suggesting that there should be no time limit for Interim Registration, with another suggesting that there should be a clear and limited timeframe for Interim Registration alongside embedded support to ensure momentum is maintained to work towards Full Registration.

14.2.3 Comments expressing concerns about the proposal

Stakeholder concerns

Colleges Scotland, along with four colleges, expresses concern about the proposed category name, urging renaming of the category to College Education, and concern about the proposed date noting that Interim Registration should be applicable to those employed as lecturers in colleges prior to 1st April 2022.

The Educational Institute of Scotland expresses concern about the proposal, suggesting retention of three categories of registration status: Interim, Full, and Provisional (Conditional). The respondent suggests that this facilitates registration for lecturers qualified outside Scotland who may require to complete top-up qualifications and for new lecturers employed after 4th April 2022 who meet the required criteria. The respondent expresses further concern about the time limit for achieving full registration to be set out in an Interim Registration Policy, noting that they would welcome further discussion with GTC Scotland prior to the drafting of the policy to ensure that the time limits set are realistic and achievable, particularly given the difficulties lecturers currently face in accessing TQFE.

The University of Edinburgh states that while not unsupportive of the proposal, they question the rationale for having an Interim, rather than Provisional, category for Further Education and note that this creates an inconsistency across sectors.

One stakeholder requests more clarity, although they note that the proposal partly addresses the issues related to the proposal to broaden the scope of teaching qualifications that meet registration criteria in Further Education.

Respondent concerns

A few respondents express concern about the proposal, suggesting that this creates a two-tiered system, that there should only be one category of registration and that the proposed approach is too bureaucratic.

A few respondents express concern about funding, noting the need for Government commitment to resource the transition towards a fully qualified lecturer workforce if professional registration of lecturers is to achieve its full potential and command public confidence.

A few respondents express concern about the rationale for the proposal, suggesting that transparency and equity the two registration statuses should be the same across all sectors.

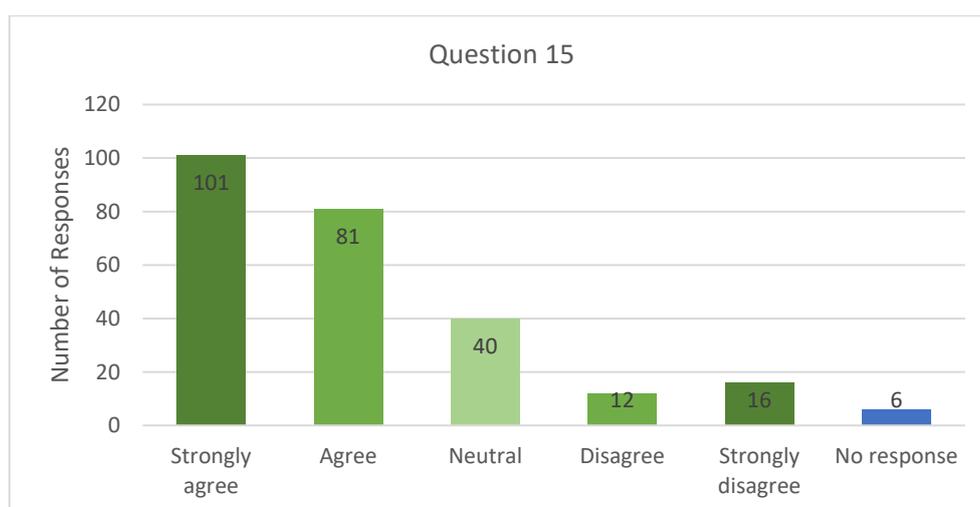
One respondent expresses concern about the impact of the proposal on specialists in Further Education, suggesting the use of competency assessments for people without a teaching qualification.

Q15: To be registered on the Register of Teachers, GTC Scotland propose that individuals who qualified outside Scotland must hold a teaching qualification (meaning they have completed teacher education comparable to that required of a teacher qualified in Scotland) and have academic qualifications as outlined in Schedule 2 of the Rules.

15.1 Quantitative analysis

Responses to this proposal are broadly supportive. Almost three-quarters (71%) of respondents indicate that they either Strongly Agree or Agree with the proposal. Just under one-fifth (18%) provided either a neutral response or did not provide an answer. A small proportion (11%) of respondents indicate that they either Strongly Disagree or Disagree with the proposal.

When analysed by perspective, the groups indicating support for the proposal include local authority officers (95%), university lecturers (86%), college lecturers (86%), individual teachers (78%) and education stakeholders (53%). Four of the five national educational bodies agree with the proposal with one body indicating that they disagree with the proposal. A significant proportion of parents/carers (74%), education stakeholders (43%), and all students/pupils (100%), either remain neutral or do not provide a response. The main groups that do not support the proposal are college lecturers (14%), university lecturers (14%), individual teachers (12%) and parents/carers (17%).



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	33%	53%	0%	7%	7%	0%
Education stakeholder	5%	48%	29%	5%	0%	14%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	45%	33%	9%	5%	7%	1%
Local authority	100%	0%	0%	0%	0%	0%
Local authority officer(s)	75%	20%	5%	0%	0%	0%
National educational body	40%	40%	0%	20%	0%	0%
Parent(s)/carer(s)	4%	4%	70%	0%	17%	4%
Student/pupil	0%	0%	67%	0%	0%	33%
University lecturer	57%	29%	0%	14%	0%	0%
Total	39%	32%	16%	5%	6%	2%

15.2 Qualitative analysis

15.2.1 Comments expressing support for the proposal

Colleges Scotland, along with two colleges, expresses support for the proposal while reiterating their earlier concern about the requirement for qualifications to be no higher and cause no additional burden to TQFE pathway requirements and qualification.

The Educational Institute of Scotland expresses support for the proposal while reiterating their earlier concern in relation to the academic or vocational qualifications specified in Schedule 2. The respondent notes that equivalency of qualifications is crucial to ensure there is no dilution of standards.

Bòrd na Gàidhlig expresses general support, suggesting the need for further reflection to establish clarity regarding provision that may impact on Gaelic-Medium Education in Scotland, for example Canadian qualifications such as those provided by St. Francis Xavier University in Nova Scotia.

A few respondents express support, stating that this will ensure equivalency, increase transparency and consistency, and prevent dilution of standards. One respondent expresses support provided it is a fair and transparent comparison, including those qualified from England with Qualified Teacher Status.

15.2.2 Suggestions about the proposal

Drumduan School, along with many respondents, state that they welcome a broadening of the scope of teaching qualifications that meet registration requirements and suggests that this will support quality and flexibility of teacher appointment and deployment in Steiner schools. The respondent further suggests that if this is not possible, a separate registration category specific for Steiner Teachers would be required.

Colleges Scotland, along with three colleges, expresses support for the proposal with the caveat that consideration be given to employer references and assessments. The respondents note that the criteria for ensuring compatibility of qualifications can be relatively restrictive, suggesting that some form of employer assessment may be useful for individuals seeking registration who cannot register due to a technicality of the Qualified Outside Scotland (QoS) process. The respondents suggest that not ensuring some flexibility would potentially restrict the development of high-quality teaching in Scotland. The respondents further note that the College sector would be willing to support the development of a process for employer assessment.

The Scottish Sensory Centre suggests that alongside teaching and academic qualifications, all teachers qualified outside of Scotland should meet equivalent communication standards.

Education Scotland suggests that consideration be given to ensure mechanisms and professional learning opportunities are provided by partners to support the transition to a new system, similar to the Return to Teach programmes at some universities.

A few respondents suggest that there needs to be some flexibility, noting that it may be necessary to look at individual cases to recognise experience and suggesting that employer references should also inform this process.

A few respondents from Edinburgh Steiner School suggest that Steiner Teacher qualifications be recognised, as long as they are recognised by the Association of Steiner Waldorf Teacher

Educators or the Steiner Waldorf Schools Fellowship (UK) or those associated with a university internationally.

One respondent suggests the need to ensure consistency across the sector, specifically that requirements of those who qualify outside of Scotland should be in line with those who are allowed to teach at UK independent schools. The respondent provides examples of people with substantial amount of experience working as pupil support assistants or bilingual community support workers not allowed to teach English as an Additional Language or Additional Support Needs, or gain the equivalent salary, because they have foreign teaching qualifications. The respondent suggests that the mechanism by which teachers in the independent sector can enrol on a course to gain their teaching qualification be extended to all teachers trained overseas.

15.2.3 Comments expressing concern about the proposal

Stakeholder Concerns

Colleges Scotland, along with two colleges, express concern about the removal of the Provisional (Conditional) category, noting that without this category lecturers would need to completely retrain to become registered in Primary or Secondary categories rather than using the current top-up arrangements. The respondents state that removal of this category is not acceptable to the College sector.

The University of Edinburgh expresses concern about potential negative impact of the proposal on diversity and representation across Scottish education. The respondent states that to build a culturally diverse profession, it is important to ensure there are no unnecessary bureaucratic barriers to recruitment particularly with regards to language teachers and people with expertise in engineering or arts and crafts. The respondent further suggests that the subjects listed as part of the academic qualifications in Schedule 2 of the rules are traditional in focus and scope, stating that they are not reflective of the changing landscape and opportunities to develop applied and broader expertise. The respondent notes that this includes teachers who are able to support students to undertake socially relevant projects in community-based contexts for health and wellbeing, citizen science, activism, and creative industries.

The Educational Institute of Scotland expresses similar concerns about diversity and inclusion, noting the possible equality impact of the proposal. The respondent states that removal of the Provisional (Conditional) registration could result in a teacher or lecturer qualified outwith Scotland having to completely re-train when previously a top-up qualification, gained while being in paid employment, would have allowed them to apply for full registration. The respondent notes that the costs of retraining may be prohibitive and adversely impact women and people from ethnic minority backgrounds. The respondent therefore suggests further consideration be given to retaining the status of Provisional (Conditional) registration to ensure that applicants whose qualifications may fall short of the equivalence test would be eligible for full registration on completion of the appropriate top-up qualification.

Edinburgh Steiner School expresses similar concerns, stating that they are unable to support the proposal unless it includes provisions which would allow recruitment of teachers from overseas who teach in subjects which do not feature within British mainstream education and who are therefore likely to hold qualifications which lie outside the range of academic qualifications outlined in the Rules. The respondent provides the example of Eurythmy, a form of specialist therapeutic artistic movement taught in Steiner schools and often by teachers who have trained overseas, noting that if the proposal were implemented without flexibility, their school would be greatly constrained in the recruitment of key staff with specialist Steiner-based skills. The respondent suggest that this would greatly limit its educational offering and damage the range and diversity of Scotland's educational provision.

The Scottish Council of Independent Schools also expresses concern about the need for flexibility, without providing further details.

Glasgow Clyde College express concern about consistency, stating that GTC Scotland has accepted that lecturers joining the register do not require academic qualifications.

Respondent concerns

Many respondents express concerns about the proposal for equivalency and comparable qualifications. These respondents express serious concern about the potential negative impact on diversity across Scottish education, particularly at a time of workforce shortages, and specifically highlight the potential impact on Steiner/Waldorf schools. Respondents note that many people trained overseas have valuable specialist skills and qualifications that are not available in Scotland, and that some teachers will have come through alternative routes such as Teach First. These respondents seek clarity on which qualifications will be deemed 'comparable' and how this comparability will be decided. One respondent suggests the need for a case-by-case dialogue with GTC Scotland when a teacher who holds a less well-known qualification from abroad is proposed for registration. The respondent provides the example that in Steiner/Waldorf education, a teacher may have a training certificate or diploma that is highly regarded by our network of schools but not recognised by GTC Scotland. The respondent suggests that a process of ongoing dialogue regarding 'exceptions' or 'exemptions' would be welcome.

A few respondents express concern about the proposal, stating that retention of Provisional Registration is important to enable people from outside Scotland to complete their registration, to support recruitment in under-served areas and increase diversity in the teaching profession.

A few respondents express concern about the registration process, suggesting that this is too restrictive. One respondent recounts their own experience of not being able to teach in Scotland due to the Assessment Only route not being considered valid and suggests that this qualification be allowed for conversion to teach in Scotland. Other concerns are around Qualified Teacher Status from outside of Scotland, noting that teachers who have gained Qualified Teacher Status without the PGCE have to undertake a rigorous process of evidence to prove they meet teaching standards as well as passing an introductory year Newly Qualified Teacher. This respondent suggest that the register broadens criteria in line with England and Wales. In contrast, one respondent expresses concern about subject specialisms, requesting that GTC Scotland not follow other parts of the UK where anyone with a teaching qualification can teach any subject at Secondary level.

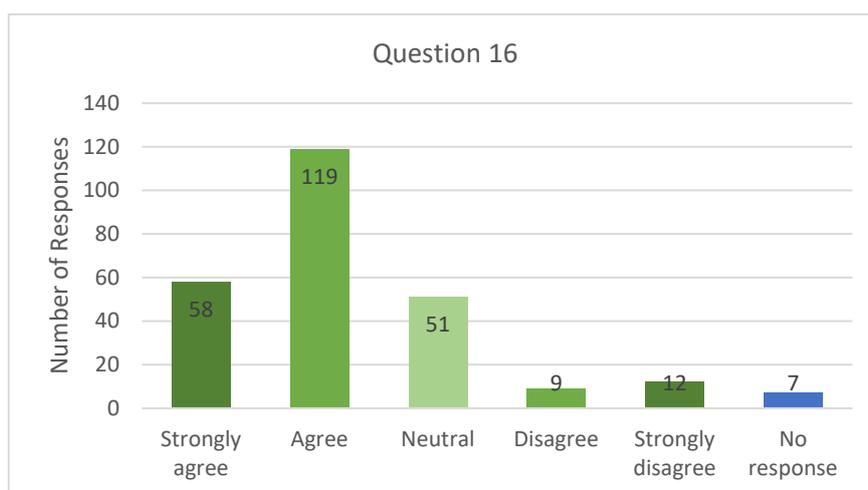
A few respondents express concern about maintaining standards, including of English language communication and of the level of direct classroom practice experience.

Q16: GTC Scotland then propose that, if the criteria above have been met, individuals who qualified outside Scotland will be placed on the register according to their qualifications in line with the requirements for registration and definitions for each category of registration set out in the Rules.

16.1 Quantitative analysis

Responses to this proposal are broadly supportive. The majority of respondents (69%) indicate that they either Strongly Agree or Agree with the proposal. Just over one-fifth (23%) provided either a neutral response or did not provide an answer. A small proportion (9%) of respondents indicate that they either Strongly Disagree or Disagree with the proposal.

When analysed by perspective, the groups indicating support for the proposal include local authority officers (95%), college lecturers (80%), university lecturers (72%), individual teachers (76%) and education stakeholders (53%). Four of the five national educational bodies agree with the proposal with one body indicating that they disagree. A significant proportion of parents/carers (74%), education stakeholders (34%), and all students/pupils (100%), either remain neutral or do not provide a response. The main groups that do not support the proposal are parents/carers (17%), education stakeholders (15%), university lecturers (14%), individual teachers (7%) and college lecturers (7%).



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	33%	47%	13%	0%	7%	0%
Education stakeholder	5%	48%	24%	10%	5%	10%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	25%	51%	16%	3%	4%	1%
Local authority	0%	100%	0%	0%	0%	0%
Local authority officer(s)	30%	65%	0%	0%	0%	5%
National educational body	40%	40%	0%	20%	0%	0%
Parent(s)/carer(s)	4%	4%	70%	0%	17%	4%
Student/pupil	0%	0%	67%	0%	0%	33%
University lecturer	43%	29%	14%	14%	0%	0%
Total	23%	46%	20%	4%	5%	3%

16.2 Qualitative analysis

16.2.1 Comments expressing support for the proposal

A few respondents and stakeholders express general support for the proposal, noting that equivalent rules are appropriate.

16.2.2 Suggestions about the proposal

Colleges Scotland, including four colleges, reiterates their previous points regarding: qualification levels being no higher than TQFE pathway requirements and qualification; registration criteria; and category definition.

The University of Edinburgh suggests that consideration be given to how this process is managed and the requirements placed on those who need to be registered to teach in Initial Teacher Education within Higher Education Institution contexts.

A few respondents make the following suggestions:

- teachers trained outside of Scotland complete a probationary period to ensure they fully understand and engage with what it means to be a teacher in Scotland;
- valid qualifications include Assessment Only route Qualified Teacher Status;
- ensure appropriate validation for creative teachers;
- provisional registration for teachers who have recently arrived in Scotland to ensure a supportive transition into the Scottish system;
- a teacher qualified outside of Scotland holding a qualification allowing them to teach Secondary level is also recognised in the College sector.

16.2.3 Comments expressing concerns about the proposal

Stakeholder concerns

The Educational Institute of Scotland reiterates concerns about the proposed changes to the registration criteria and the definition of each category of registration, noting that the same concerns apply when considering applications from individuals who have qualified outside Scotland. The respondent states that there must be parity across the processes.

Drumduan School and Edinburgh Steiner School express concern about the proposal, noting that a Steiner Teacher category is required to avoid serious recruitment issues and prevent significant negative impacts on cultural diversity.

Respondent concerns

Many respondents express concern about the proposal, noting that a Steiner Teacher or Steiner School category is required to avoid serious recruitment issues and prevent significant negative impacts on cultural diversity.

A few respondents express concern about registration requirements, noting that the need for an alternative, flexible method of assessment with exemptions and exceptions. Concerns raised include:

- the requirement for teachers trained overseas to have a certain number of days of teaching in a Scottish school, suggesting that their experience abroad be considered to ensure equity;
- lack of recognition of vocational teaching courses such as Teach First;
- teachers from international schools with an international PGCE from a UK university not being eligible;
- reduction in diversity through excluding people with extensive alternative experiences and qualifications;

-
- it should be made easier rather than more difficult to attain the Standard for Full Registration.

A few respondents, including teachers with direct experience of transferring into the Scottish system, express concerns about transparency, noting the importance of ensuring that criteria are published and consistently applied to support diversity in the workforce.

A few respondents express concern about registration of teachers trained outside the UK, including Steiner/Waldorf teachers, who are trained to teach across the full age range. These respondents note that if they cannot be accommodated by the proposed tripartite model there would need to be a Named School Only arrangement to allow them to teach according to the pedagogy for which they have been trained.

A few respondents express concern about standard of English, stating that this is important to maintain quality of experience for both teachers and students.

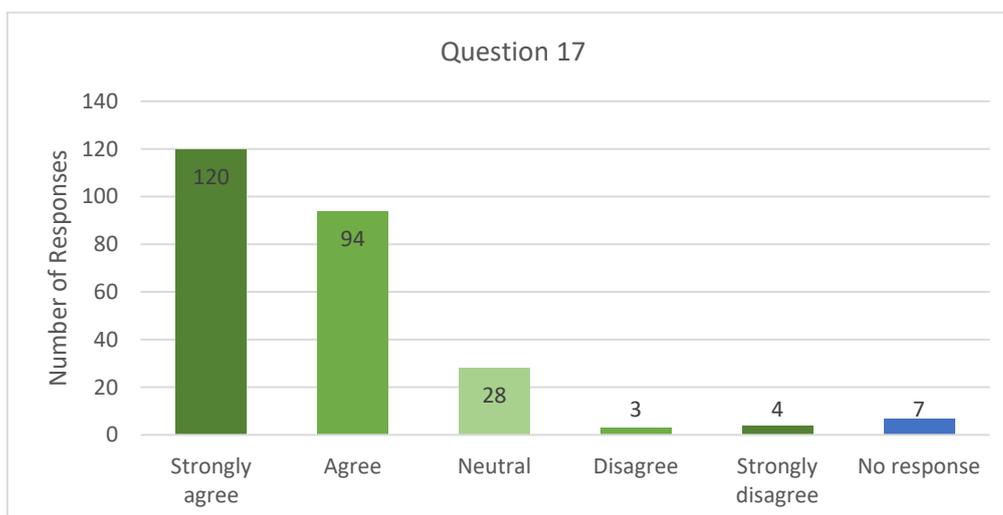
One respondent expresses concern about lack of clarity, noting that the proposal does not appear to be different to current arrangements.

Q17: GTC Scotland propose that there should be an Additional Registration Framework to allow a registered teacher to add another category to their registration. This framework should be clearer and more accessible than the current system for Professional Registration.

17.1 Quantitative analysis

Responses to this proposal are broadly supportive. The vast majority of respondents (84%) indicate that they either Strongly Agree or Agree with the proposal. A small proportion (14%) of respondents provided either a neutral response or did not provide an answer. Only (3%) of respondents indicate that they either Strongly Disagree or Disagree with the proposal.

When analysed by perspective, the groups indicating support for the proposal include all university lecturers (100%), local authority officers (95%), parents/carers (87%), individual teachers (84%), education stakeholders (76%), college lecturers (74%) and students/pupils (67%). Four of the five national educational bodies agree with the proposal with one body providing a neutral response. A significant proportion of students/pupils (33%), college lecturers (27%), education stakeholders (24%) and individual teachers (14%) either remain neutral or do not provide a response. One local authority does not support the proposal.



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	47%	27%	27%	0%	0%	0%
Education stakeholder	52%	24%	10%	0%	0%	14%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	43%	41%	13%	1%	1%	1%
Local authority	0%	0%	0%	100%	0%	0%
Local authority officer(s)	45%	50%	0%	0%	0%	5%
National educational body	40%	40%	20%	0%	0%	0%
Parent(s)/carer(s)	74%	13%	4%	0%	9%	0%
Student/pupil	67%	0%	0%	0%	0%	33%
University lecturer	57%	43%	0%	0%	0%	0%
Total	47%	37%	11%	1%	2%	3%

17.2 Qualitative analysis

17.2.1 Comments expressing support for the proposal

Colleges Scotland, along with five colleges, expresses cautious support for the development of an Additional Registration Framework noting that greater clarity and guidance for individuals seeking additional registration is very much welcomed. The respondents state that the College sector welcomes the potential for ‘top up’ qualifications to allow College lecturers to qualify as Primary or Secondary teachers, with the caveat regarding Provisional (Conditional) registration. The respondents further reiterate their previous comments regarding registration criteria and category definition and emphasise that any future use of the proposal to restrict or limit delivery of individuals would not be acceptable.

The University of Edinburgh expresses support for the proposal, noting the flexibility that additional registration categories provide for individuals. The respondent welcomes an updated framework that provides greater clarity.

The Scottish Sensory Centre expresses support, noting that the proposal is especially important for teachers of learners with visual impairment and teachers of deaf children.

Drumduan School expresses support, suggesting that additional registration represents a teacher’s full range of skills and specialisms. Education Scotland expresses similar support, noting that this proposal broadens the scope for a teacher’s career trajectory and allows for flexibility and inclusivity.

Bòrd na Gàidhlig expresses support for the proposal while noting the potential impact on the pilot Additional Teaching Qualification funded by the Bòrd and being delivered by the University of Strathclyde. The respondent further notes that the pilot will be evaluated at the end of 2022 and it is hoped to extend the pilot subject to evaluation.

One stakeholder welcomes the proposal while noting the need for the scheme to operate equally across the Primary, Secondary and College sectors.

A few respondents express support for the proposal, specifically that:

- the current system is not fit for purpose;
- the proposed system would provide more flexibility;
- the proposed system would offer teachers the opportunity to enhance their registration through accredited specialisms;
- the proposal would make teachers more employable;
- simplifying the framework would increase the number of teachers who are dual qualified thereby enabling use of the current talent pool already employed by the schools and going some way to ease the shortage of some subject teachers.

17.2.2 Suggestions about the proposal

The University of Edinburgh suggests that it will be important to recognise the distinctions between ‘additional registration’ and ‘accredited specialisms’, and notes that dual registration from Initial Teacher Education and agreed Teacher Induction Scheme pathways should still be retained.

Other suggestions provided by respondents include:

- that the proposal also be applied to Early Learning and Childcare and Additional Support Needs;
- provision of a comprehensive list of available certifications, including an up-to-date list of institutions where those certifications can be pursued;
- financial recognition when any additional qualification has included completion of further education;

-
- a partnership approach between the university sector and local authorities to improve processes;
 - flexibility be embedded into the new system to capture any changes in subjects or expertise;
 - that additional registration represents a teacher's full range of skills and specialisms.

One respondent suggests that teachers be allowed to teach any age range, excluding early years and childcare.

One respondent suggests that the proposal requires improved understanding of what academic qualifications entail, for example that most Masters and all PhD qualifications involve a very broad range of expertise, and therefore should be accepted for the academic part of the qualifications.

17.2.3 Comments expressing concern about the proposal

Stakeholder concerns

The Educational Institute of Scotland expresses concern about lack of clarity. The respondent states that the consultation paper does not specify what a new Additional Registration Framework would contain and whether existing rules which govern the transfer between categories would be changed, stating that as a result they are unable to definitively comment. The respondent notes the flexibility provided by current arrangements and suggests that while these provisions could be collated in one framework for accessibility and clarity, they do not believe it necessary to change existing provisions in relation to routes for professional registration. The respondent does however suggest that current arrangements are extended to be inclusive of registrants in the Further Education category.

The NASUWT expresses general support for the proposal, however they note that they would prefer to see more details on the proposed Additional Registration Framework before fully endorsing the change.

One stakeholder expresses concern that the proposal is overly technical, stating that they are not clear for the rationale for a separate framework and suggest enhancement of the existing framework.

Respondent concerns

A few respondents express concern about the lack of detail in the proposal, requesting more information about the Additional Registration Framework be provided. Specifically, respondents request further information on:

- how the Additional Registration Framework differs from the Accredited Specialism Framework;
- potential costs;
- types of acceptable additional or specialist qualifications;
- whether this would focus on mainstream categories at the expense of diversity;
- how the proposal may affect small schools, for example whether it would preclude an upper school teacher of Physics, with a Physics degree, from taking lessons in maths;
- how registered specialists and people with qualifications outside of Scotland will either transfer onto the new system or meet Scottish qualifications in a timely manner.

A few respondents express concern about the proposals in relation to cross-registration, noting the potential significant negative impact of the proposals if this is not allowed. Specifically, these respondents request clarity on the process and requirements for:

- fully registered teachers of primary education who are seeking additional registration as a fully registered secondary subject education teacher; and,

-
- fully registered teachers of secondary education who are seeking additional registration as a registered primary education teacher.

These respondents request clarity on the potential to either amend the proposal to enable cross-registration to teach from Class 1 – 8 or include a separate category of Preparatory School Teacher. The respondents note that this would ensure the continued functioning of Steiner/Waldorf schools as class teachers could continue with the class from Class 1 – 8 and Secondary teachers could continue to teach specialty subjects at Lower School and Middle School level.

One respondent expresses concern about the proposed implementation date of April 2022, noting that this does not give sufficient time for either effective consultation or completion of the Equality Impact Assessment.

One respondent expresses concern about the potential negative impact on teachers already teaching a variety of classes across several subjects, suggesting that time for additional training needs would need to be built in.

One respondent expresses concern about the proposal being applicable at Primary level, providing the example that a French speaking qualified teacher should be able to teach rudimentary French to young pupils. This respondent expresses concern that the proposal may restrict flexibility, noting that in small schools it is essential that various teachers can support pupils in a variety of skills and subjects.

A few respondents express concern about the necessity of the proposal and the potential for increased bureaucracy for teachers.

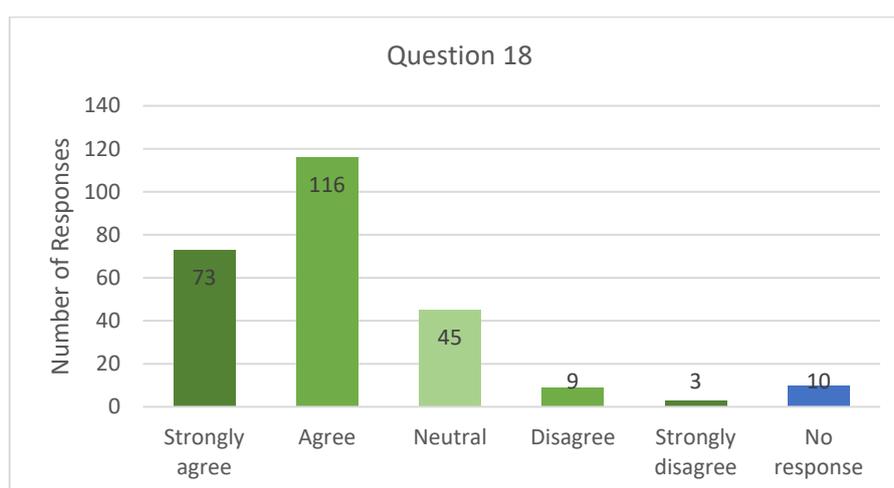
One respondent expresses concern about the robustness of the proposed system, suggesting that the current system of Secondary staff undertaking professional learning to transfer to Primary level undermines Primary education.

Q18: GTC Scotland propose the creation of a qualification-based Accredited Specialism Framework to allow a registered teacher to add area(s) of specialism to their registration.

18.1 Quantitative analysis

Responses to this proposal are broadly supportive. Almost three-quarters of respondents (74%) indicate that they either Strongly Agree or Agree with the proposal. Just over one-fifth (22%) provided either a neutral response or did not provide an answer. A small proportion (5%) of respondents indicate that they either Strongly Disagree or Disagree with the proposal.

When analysed by perspective, the groups indicating support for the proposal include local authority officers (95%), university lecturers (86%), individual teachers (76%), college lecturers (67%), and education stakeholders (39%). Three of the five national educational bodies agree with the proposal with two bodies remaining neutral. A significant proportion of education stakeholders (62%), students/pupils (33%), college lecturers (27%), individual teachers (19%) and parents/carers (13%) either remain neutral or do not provide a response. A small proportion of parents/carers (9%), college lecturers (7%) and individual teachers (6%) indicate that they do not support the proposal.



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	40%	27%	27%	7%	0%	0%
Education stakeholder	10%	29%	48%	0%	0%	14%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	32%	44%	16%	5%	1%	3%
Local authority	0%	100%	0%	0%	0%	0%
Local authority officer(s)	50%	45%	5%	0%	0%	0%
National educational body	20%	40%	40%	0%	0%	0%
Parent(s)/carer(s)	4%	74%	13%	0%	9%	0%
Student/pupil	0%	67%	0%	0%	0%	33%
University lecturer	29%	57%	0%	0%	0%	14%
Total	29%	45%	18%	4%	1%	4%

18.2 Qualitative analysis

18.2.1 Comments expressing support for the proposal

Colleges Scotland, along with three colleges, expresses cautious support for the rationale for an Accredited Specialism Framework.

The NASUWT expresses cautious support, noting that they would prefer to see more details on the proposed Accredited Specialism Framework before fully endorsing this change.

The University of Edinburgh welcomes the proposal and expresses support for this approach.

The Scottish Sensory Centre expresses support for the proposal, noting that this is especially important for teachers of learners with visual impairment and teachers of deaf children.

One stakeholder expresses support, noting that they welcome this approach for adding a range of additional qualifications.

A few respondents express support, welcoming the flexibility and opportunity for teachers to gain qualifications while in practice.

18.2.2 Suggestions about the proposal

The University of Edinburgh suggests that the Accredited Specialism process be a qualification-based route and through award of formal qualification. The respondent suggests that qualification should be developed through appropriate practice-focused masters level study and award, with minimum qualification level being a Postgraduate Certificate. The University of Edinburgh further suggests that GTC Scotland consults with providers of relevant continuing teacher education qualifications to inform the process and requirements of gaining Accredited Specialism. The respondent specifically notes that it is unclear whether there is an intention to develop an accreditation approach for certain formal qualifications and suggests consultation is required. The University further suggests that this proposal needs to be financially supported through complementary approaches by Scottish Government.

Bòrd na Gàidhlig suggests that Gaelic-Medium Education teachers have a recognised pathway to acquiring Accredited Specialism in Gaelic-Medium Education. The respondent suggests that the Accredited Specialism route is open to a developing set of Gaelic-Medium Education qualifications, specifically through:

- qualifications provided through Gaelic-Medium Education Initial Teacher Education at Sabhal Mòr Ostaig, University of Strathclyde or the University of Edinburgh Degree in Primary Education with Gaelic;
- additional qualifications relating to Gaelic-Medium Education, noting that there are currently developments under discussion;
- additional qualifications relating to Leadership in and of Gaelic-Medium Education, noting that these are currently in development.

Education Scotland suggests that consideration be given to working collaboratively with a range of stakeholders and professional learning providers across Scotland to ensure that the framework remains relevant, contextual and aligns with existing system-wide specialisms.

West College Scotland suggests that further discussion on the scope and potential impact of the proposal would be welcome.

A few respondents suggest that there should be separate recognition for the mandatory qualifications for Qualified Teachers of the Hearing Impaired and Qualified Teachers of the Visually Impaired, and that any such mandatory qualifications should be easy to add onto the system.

One respondent suggests that a commitment to developing high quality Career Long Professional Learning (CLPL) is key to successful delivery of this proposal.

One respondent suggests that the process should be straightforward, suggesting that a headteacher's signature should be sufficient evidence for registration.

18.2.3 Comments expressing concern about the proposal

Stakeholder concerns

The University of Edinburgh expresses concern about how the professional recognition process will complement the Accredited Specialisms, suggesting that clear distinctions will need to be made to individuals, organisations and employers. The respondent states that they would not be supportive of professional recognition being sufficient to award an Accredited Specialism but would certainly value this as part of the wider achievements and professional development of an individual.

Colleges Scotland, along with three colleges, expresses concern over the reach of the framework and the possibility of future unintended consequences or impacts on any teacher, but especially lecturers in the College sector. Specifically, respondents state that the College sector would not support the requirement to register with an industry specialism, as this would be akin to having a 'subject' within the category on the Register, and the College sector does not support this approach. The respondents express further concern that this approach could present challenges for College lecturers already teaching access and additional support as it is unclear from the examples how some of the specialisms in this area would be differentiated from the Accredited Specialism Framework.

The Educational Institute of Scotland expresses concern about the rationale underpinning the proposal, stating that it is currently not clear why the proposed qualification-based approach cannot be incorporated in the current procedures for professional recognition. The respondent notes that the consultation document does not provide information on the types or levels of qualification which would be accepted as part of this accreditation procedure and does not link proposals with the Professional Standards and Professional Update. The respondent expresses concern that the focus on qualification within the proposed Accredited Specialism Framework may create a two-tier system with experienced-based specialisms potentially being undervalued.

The Educational Institute of Scotland expresses further concern over the reference in the consultation document to employers using the accredited specialism designation 'to identify teachers with the necessary expertise and experience that they may require in particular specialist contexts.' The respondent expresses concern about individual decisions to undertake learning being influenced by the actions of the employer, particularly in relation to the imposition of additional selection criteria in recruitment or development opportunities, or where there is a shortage of teachers in a given subject area. The respondent states that external factors should not be the driving factor for completion of specialist study. The respondent also expresses concern that the requirement to renew professional recognition after a period of five years has been removed from the draft Rules and states that they would welcome confirmation that such renewal will no longer be necessary.

Drumduan School expresses concern about the proposal, noting that this may limit teachers to Primary or Secondary when they may be able to offer skills in both areas. The respondent states that this is particularly relevant for Steiner/Waldorf education.

Glasgow Clyde College expresses concern that adding an areas of specialism could lead to lecturers self-limiting how they are utilised within Colleges.

The Scottish Council of Independent School expresses concern about a lack of clarity, suggesting that it is unclear how the proposal differs from current arrangements for adding further areas of specialism.

Respondent concerns

Many respondents express concerns about the potential negative impact of the proposals on some specialists, suggesting that for some specialisms accreditation should be based on qualifications, skills and experience. The same respondents express further concern about preventing teachers being able to teach across Primary and Secondary levels. These respondents note that for these reasons, the proposal may have a significant negative impact on the continued functioning of their schools.

Similarly, a few other respondents also express concern about potential impact on specialists, requesting clarity on how the proposals may impact people currently employed as specialists and how this may impact specialists who may not have a teaching qualification but bring valuable professional experience.

A few respondents request further clarity on the proposal, noting that there is currently not sufficient detail to provide comprehensive comments. Respondents request more specific detail on:

- whether it will focus on University modules only;
- differences between the Additional Registration Framework and the Accredited Specialism Framework;
- implementation of the framework, including proposed start date;
- whether this will be reflected on Search the Register;
- potential costs;
- who would decide on appropriate qualifications and how this process would be managed and recorded;
- how specialisms, for example handwork, gardening or eurythmy, would be accredited.

A few respondents express other concerns, specifically:

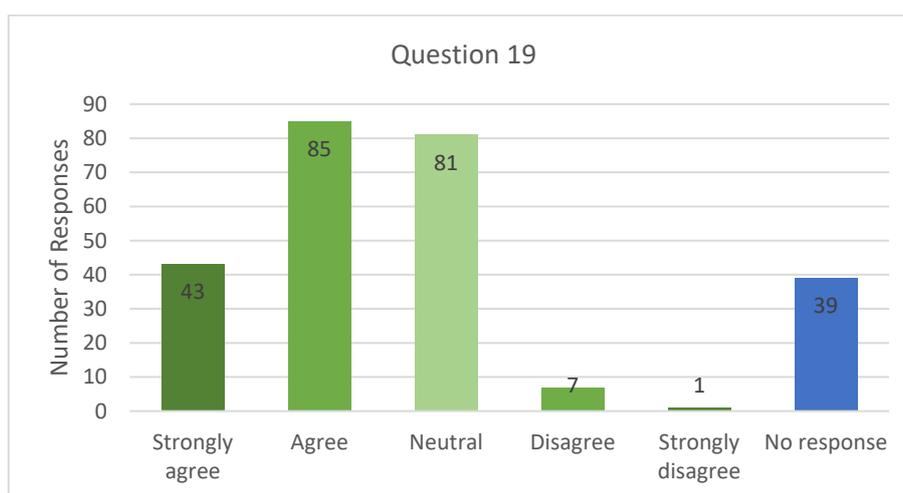
- funding, noting the need for funding across all sectors
- timing of training, noting that this should take place during work time;
- the focus on qualifications, noting that some people bring valuable practice experience;
- negative impact on teachers being able to teach across various related subjects, for example a physics teacher teaching maths.

Q19: GTC Scotland propose amendments relating to the Professional Standard for Headship, including an additional Schedule 3, to ensure the Rules reflect current practice, routes and recognition of Professional Standard for Headship.

19.1 Quantitative analysis

Responses to this proposal indicate broad support, although almost half of respondents (47%) either remained neutral or did not provide a response. Overall, half of respondents (50%) indicate that they either Strongly Agree or Agree with the proposal and only a small proportion (3%) indicating that they either Strongly Disagree or Disagree.

When analysed by perspective, the groups indicating support for the proposal include all local authority officers (100%), all university lecturers (100%), individual teachers (54%) and college lecturers (40%). Four of the five national educational bodies agree with the proposal with one body remaining neutral. All students/pupils (100%) and almost all parents/carers (96%) and education stakeholders (91%), along with a significant proportion of college lecturers (60%) and individual teachers (42%), either remain neutral or do not provide a response. A small proportion of individual teachers (5%) indicate that they do not support the proposal.



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	20%	20%	40%	0%	0%	20%
Education stakeholder	5%	5%	43%	0%	0%	48%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	16%	38%	34%	4%	1%	8%
Local authority	0%	100%	0%	0%	0%	0%
Local authority officer(s)	50%	50%	0%	0%	0%	0%
National educational body	20%	60%	20%	0%	0%	0%
Parent(s)/carer(s)	4%	0%	48%	0%	0%	48%
Student/pupil	0%	0%	0%	0%	0%	100%
University lecturer	29%	71%	0%	0%	0%	0%
Total	17%	33%	32%	3%	0%	15%

19.2 Qualitative analysis

19.2.1 Comments expressing support for the proposal

The University of Edinburgh expresses support for the award of the Standard for Headship as a mandatory requirement for all newly appointed Headteachers. The respondent also recognises the need to create an equivalency for those moving to Scotland who have gained equivalent headship qualifications or substantive experience in role in other countries.

One respondent expresses general support for the proposal, without providing further details.

19.2.2 Suggestions about the proposal

The University of Edinburgh suggests that careful consideration be given to implementation in order to identify distinctions and ensure the equivalency aligns to the Standard for Headship, while also enabling individuals to come to Scottish education and have their qualifications and expertise valued. The respondent suggests consultation with key stakeholders in the provision of Headship preparation.

Bòrd na Gàidhlig suggests that the specific context of leadership in Gaelic-Medium Education be provided for within the Rules. The respondent states that this may relate to Professional Standard for Headship acquired within the Gaelic-Medium Education context or future development of new qualifications, such as a module in Leadership of Gaelic-Medium Education for English-speaking members of a Senior Leadership Team who have strategic responsibility for Gaelic-Medium Education.

Education Scotland notes that the current national Into Headship programme was re-accredited in 2021 and was commended for the collaborative partnership approach in its design and delivery. The respondent therefore suggests that, given its members' expertise and experience, the National Design group be seen as a key partner in all future discussions around Rules and the reflection of current practice.

The Educational Institute of Scotland suggests that application of the equivalence provisions in assessing headship qualifications achieved outside Scotland be monitored closely to ensure no dilution in standards.

Two further suggestions from respondents include:

- alternative, practical routes for new headteachers who are appointed based on experience rather than Standard for Headship to ensure workloads remain manageable;
- the development of professional standards for curriculum and academic leadership for the college sector;
- that registration be sector neutral.

19.2.3 Comments expressing concern about the proposal

Stakeholder concerns

No stakeholders express concern about the proposals.

Respondent concerns

Some respondents express a variety of concerns about the proposals, specifically:

- unmanageable workloads for newly appointed Headteachers;
- extreme pressure for Headteachers already in post, noting the already high levels of scrutiny and requesting a review of the blanket legal requirement for all Headteachers appointed from August 2020 to gain Standard for Headship;

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- the timescale for completion, noting that this is unrealistic, particularly during a pandemic;
 - lack of diversity among Headteachers, particularly in Edinburgh;
 - lack of clarity about international experience and qualifications;
 - ensuring that Headship remains accessible and attractive to a wide range of people, recognising experience and enabling progression while working;
 - that Standard for Headship focuses on academic qualifications and qualities while overlooking the leadership qualities required in practice;
 - there needs to be increased frequency of Quality Improvement Officer visits;
 - the need to address the levels of stress and bullying across the sector;
 - that this is another unnecessary change to management processes.

Q20: GTC Scotland proposes that the Registration Rules detail the obligations and requirements for registrants in maintaining their registration.

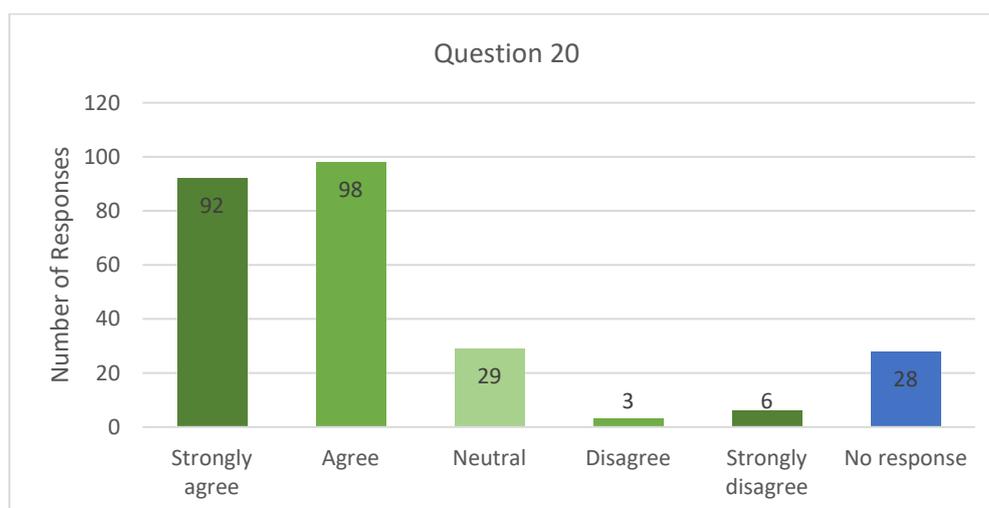
These obligations and requirements are:

- participating in a system of ongoing professional learning, review and development (Professional Update);
- notifying GTC Scotland, without delay, that they:
- have been charged with or found guilty of a criminal offence;
- are subject to disciplinary or fitness to practice processes with another professional or regulatory body;
- notifying GTC Scotland that they have changed employer, name and/or address and any other changes or amendments required to their registration record;
- remaining a member of the PVG scheme and provide updates to GTC Scotland as requested.

20.1 Quantitative analysis

Responses to this proposal are broadly supportive. Almost three-quarters of respondents (74%) indicate they either Strongly Agree or Agree with the proposal. Just over one-fifth (22%) provided either a neutral response or did not provide an answer. A small proportion (3%) of respondents indicate that they either Strongly Disagree or Disagree with the proposal.

When analysed by perspective, the groups indicating support for the proposal include all local authority officers (100%), university lecturers (86%), individual teachers (79%), college lecturers (73%) and education stakeholders (67%). All five national educational bodies agree with the proposal. All students/pupils (100%) and the majority of parents/carers (74%), along with a significant proportion of education stakeholders (34%), college lecturers (20%), individual teachers (16%) and university lecturers (14%) either remain neutral or do not provide a response. A small proportion of college lecturers (7%) and individual teachers (5%) indicate that they do not support the proposal.



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	40%	33%	20%	7%	0%	0%
Education stakeholder	10%	57%	10%	0%	0%	24%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	36%	43%	11%	1%	4%	5%
Local authority	100%	0%	0%	0%	0%	0%
Local authority officer(s)	75%	25%	0%	0%	0%	0%
National educational body	80%	20%	0%	0%	0%	0%
Parent(s)/carer(s)	13%	13%	22%	0%	0%	52%
Student/pupil	0%	0%	0%	0%	0%	100%
University lecturer	57%	29%	14%	0%	0%	0%
Total	36%	38%	11%	1%	2%	11%

20.2 Qualitative analysis

20.2.1 Comments expressing support for the proposal

The Educational Institute of Scotland, the NASUWT and Colleges Scotland, along with six colleges, express broad support for the proposal. The University of Edinburgh expresses support for the proposal, stating that the requirements are appropriate and reasonable expectations.

20.2.2 Suggestions about the proposal

The NASUWT welcomes the treatment of the Protecting Vulnerable Groups scheme as a national requirement and suggests that this could end of the practice whereby teachers registered to teach with more than one employer, for example supply teachers, are required to pay for a Protecting Vulnerable Group process with multiple employers.

Bòrd na Gàidhlig suggests that teachers within the Gaelic-Medium Education sector demonstrate specific skill development relating to Gaelic-Medium Education as an essential element in Professional Update. The respondent suggests that this may include demonstrating the application of professional learning particular to the Gaelic-Medium Education sector or Gaelic-Medium Education specific professional development, such as developing greater knowledge of immersion education.

Two respondents make suggestions, specifically:

- that as part of their annual fee, GTC Scotland do an annual check of teacher's details rather than defaulting it to teachers;
- there be a minimum number of teaching days per year.

20.2.3 Comments expressing concern about the proposal

Stakeholder concerns

Colleges Scotland, along with three colleges, expresses concern about the proposal that a registered teacher must notify GTC Scotland that they have been charged with or found guilty of a criminal offence. The respondents note that the Protection of Vulnerable Groups scheme supports GTC Scotland in exercising its regulatory duty, suggesting therefore that the proposed process of notification could be both inappropriate and burdensome to both individual registrants and GTC Scotland themselves. The respondents express further concern about the broad scope of rule 14. 4. 3 (f) in the New Registration Rules, noting that

GTC Scotland could remove an individual from the Register 'if GTCS reasonably consider this removal to be appropriate'. The respondents express concern about the breadth of this statement and request further clarification, including specific examples of circumstances where this may apply.

The Educational Institute of Scotland expresses similar concerns about the requirement to notify GTC Scotland when a registrant has been charged with or found guilty of a criminal offence, noting that there are already mechanisms in place to ensure GTC Scotland is advised of criminal convictions via the police and Disclosure Scotland. The respondent expresses further concern about the requirement for registrants to report a charge when there has not yet resulted in a conviction, suggesting that this is unnecessarily onerous. The respondent further suggests that inclusion of this Rule could potentially result in further allegations of failing to inform GTC Scotland simply because a registrant is unaware of the need to do so. The respondent suggests that this is unfair.

The Educational Institute of Scotland expresses further concern about consistency within the Rules, noting a lack of correlation between Rule 7 and Rule 14 in the draft Rules. The respondent notes that Rule 7 refers to registrants notifying GTC Scotland of a change of employer but that this is not replicated in draft Rule 14 which gives GTC Scotland authority to remove the registrant's name from the Register. The respondent suggests that this is an inconsistency, whereby there appears a requirement to notify but no consequence of failure to do so. The registrant further notes that the requirement to participate in Professional Update has been moved from a distinct stand-alone provision in the current Rules to form part of the requirements to maintain registration under new Rule 7. The respondent expresses concern about this change, suggesting that the impact of the pandemic has had a disproportionate impact on the ability of some teachers to complete this process and suggests that GTC Scotland put in place supportive measures to enable the teacher or lecturer to engage fully with the Professional Update process.

The Educational Institute of Scotland expresses further concerns about draft Rule 14.4.3(d) which deals with situations in which a teacher or lecturer holds Interim, Provisional or Provisional (Conditional) Registration and allows GTC Scotland to remove them from the Register if they have not gained full registration and/or met the specified condition(s) within the time limit prescribed by GTC Scotland. The respondent questions the fairness of removal of a registrant before expiry of the time limit, suggesting that this is premature and given the serious consequences of removal for a registrant, notably a threat to their livelihood, the respondent questions whether such action could be justiciable.

The Educational Institute of Scotland expresses concern about the provisions contained in Rule 14.4.3 that extend the grounds for removal. The respondent notes that Rule 14.4.3(f) introduces a broad provision which enables GTC Scotland to remove a teacher from the Register 'if GTCS reasonably consider this removal to be appropriate'. The respondent notes that this new addition to the Rules is not specifically mentioned in the consultation document and expresses serious concern about the lack of specificity along with insufficient notice to registrants of potential circumstances which could result in a loss of livelihood. The respondent states that they fail to see the need for inclusion of this Rule and suggest that it is deleted from the draft Rules.

The University of Edinburgh also requests clarity on the notification requirements, noting that after initial registration this area is usually an employment rather than registration issue.

Education Scotland expresses concern about the Protecting Vulnerable Groups requirement, requesting clarity on requirements for registered teachers who do not work directly with children and therefore do not fit into the specified Fitness to Teach example.

Respondent concerns

A few respondents express concerns about the proposals, specifically:

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- clarification about why registrants need to notify GTC Scotland about change in employer;
 - clarification about the rationale for informing GTC Scotland about criminal offences, noting that this is the role of the Protecting Vulnerable Groups scheme and Disclosure Scotland;
 - clarification for how people living overseas and with international addresses can retain registration, particularly if they are not able to be members of the Protecting Vulnerable Groups scheme.

A few respondents express concern about Professional Update, specifically:

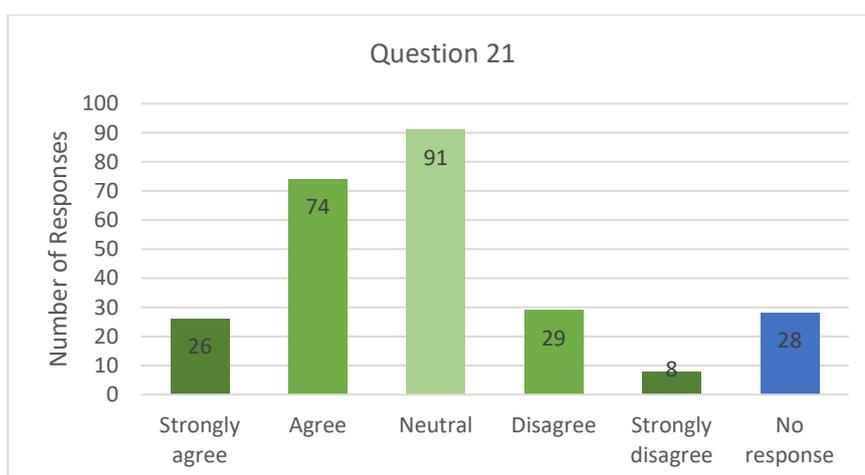
- the current Professional Update processes are time-consuming, unnecessarily interfere with a teacher's ability to do their job and need to be refined and reduced;
- the GTC Scotland website is not fit for purpose in relation to recording Professional Update;
- whether registrants will have choice about courses and evidence within Professional Update, suggesting that a sabbatical period for a formal refresh might be more appropriate;
- that ongoing professional learning should be relevant to a teacher's stage and ambition rather than led by external requirements for professional development;
- whether teachers will be informed that they will be removed from the register if they miss the Professional Update deadline;
- difficulties with recording Professional Update for those with Provisional (Conditional) Registration;
- in order to ensure integrity of the Register, criminal concerns and disciplinary actions should be in a separate category to ongoing professional development;
- clarification on Professional Update requirements for registrants in non-teaching roles.

Q21: GTC Scotland propose that a registration review is no longer referred to the panel process and instead a formal internal review process will be followed as detailed in the Rules.

21.1 Quantitative analysis

Responses to this proposal indicate broad support, although almost half of respondents (47%) either remained neutral or did not provide a response. Of the remaining respondents, the majority (39%) indicate that they either Strongly Agree or Agree with the proposal. A small proportion (14%) of respondents indicate that they either Strongly Disagree or Disagree.

When analysed by perspective, the groups indicating support for the proposal include local authority officers (80%), college lecturers (53%), individual teachers (42%) and university lecturers (29%). Three of the five national educational bodies agree with the proposal with two bodies providing a neutral response. All students/pupils (100%) and the majority of parents/carers (87%) and university lecturers (71%), along with a significant proportion of education stakeholders (48%), individual teachers (44%) and college lecturers (33%), either remain neutral or do not provide a response. The groups that do not support the proposal are education stakeholders (43%), individual teachers (14%), college lecturers (13%), parents/carers (8%) and local authority officers (5%). One local authority does not support the proposal.



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	13%	40%	33%	13%	0%	0%
Education stakeholder	5%	5%	29%	38%	5%	19%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	10%	32%	39%	10%	4%	5%
Local authority	0%	0%	0%	100%	0%	0%
Local authority officer(s)	25%	55%	10%	5%	0%	5%
National educational body	0%	60%	40%	0%	0%	0%
Parent(s)/carer(s)	0%	4%	35%	4%	4%	52%
Student/pupil	0%	0%	0%	0%	0%	100%
University lecturer	29%	0%	71%	0%	0%	0%
Total	10%	29%	36%	11%	3%	11%

21.2 Qualitative analysis

21.2.1 Comments expressing support for the proposal

A few respondents express general support for the proposal, noting that this simplifies the review process.

21.2.2 Suggestions about the proposal

Education Scotland suggest that while the proposal is appropriate in terms of streamlining the current process to make it more efficient and proportionate, consideration should be given to having an independent associate as part of the internal review, for example a local authority officer or other appropriate stakeholder, for the purpose of transparency in the appeal.

One respondent suggests that while an initial internal review would suffice in most cases, a panel review should be allowed for exceptionally difficult cases or where the teacher chooses to appeal.

21.2.3 Comments expressing concern about the proposal

Stakeholder concerns

Colleges Scotland, along with seven colleges, expresses concern about fairness, consistency and transparency of processes. The respondents request clarity about specifically how the current processes will change, noting that the statement that processes will be 'simplified and streamlined' indicates change but lacks specificity. The respondents express concern about the move away from external and diversity of involvement to an internal, singular process and noting that there are advantages of these issues being dealt with by an external panel, for example through ensuring consistency of decisions and diversity of thought.

The NASUWT states that while they understand the rationale for the proposal, they express concern about the move from a panel to an internal review process and request provision of more details about the proposal before endorsing this change.

The Educational Institute of Scotland expresses significant concerns about proposals, specifically that the proposal to remove the adjudication of these reviews from Panels would detract from the transparency of proceedings and the right of the applicant to make representations in person at a hearing. The respondent questions whether the new procedure would conform with Article 6 of the European Convention on Human Rights which makes provision for 'a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.' The respondent expresses concern that replacing the current hearing system with a review procedure by an officer employed by GTC Scotland detracts from the rights of the applicant to have decisions independently reviewed. The respondent notes the serious potential impact of the decisions under review in relation to employment of applicants, highlighting the importance of transparent, independent and fair processes.

One stakeholder requests clarity, noting that they would not support a move from a three-person panel to a single person decision making process.

Respondent concerns

Some respondents express concern about transparency and impartiality, questioning whether the proposed approach would be sufficiently robust and able to adequately deal with the complex issues that may arise. A few respondents express concern, noting that these processes should be undertaken by the regulatory body and not be the responsibility of the local authority or school.

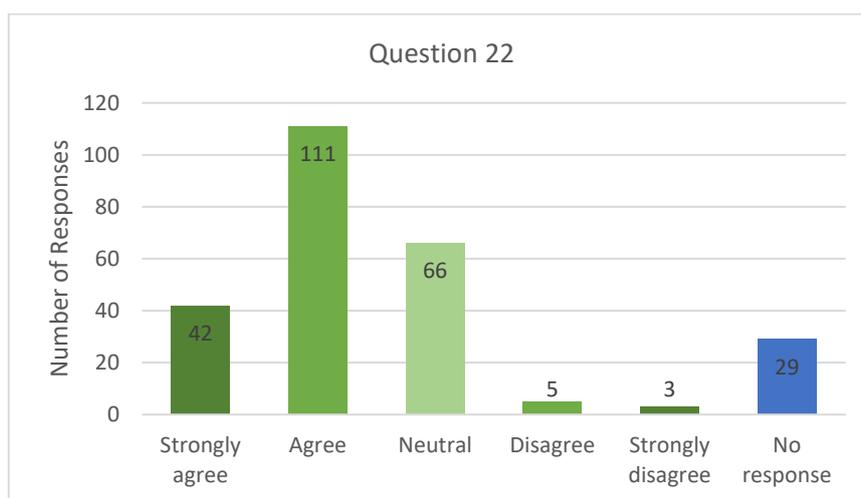
A few respondents request clarity about the proposal, specifically about who will have responsibility for these processes and how they will be implemented.

Q22: GTC Scotland propose to refine and modernise the information that is held on its register retaining current and previous employment information to enable GTC Scotland’s regulation function and better support election processes.

22.1 Quantitative analysis

Responses to this proposal are broadly supportive, although a significant proportion (37%) provided either a neutral response or did not provide an answer. The majority of respondents (59%) indicate they either Strongly Agree or Agree with the proposal. A small proportion (3%) of respondents indicate that they either Strongly Disagree or Disagree.

When analysed by perspective, the groups indicating support for the proposal include local authority officers (95%), education stakeholders (72%), individual teachers (61%), university lecturers (58%), college lecturers (53%) and parents/carers (17%). Four of the five national educational bodies agree with the proposal with one body remaining neutral. All students/pupils (100%) and the majority of parents/carers (52%), along with a significant proportion of university lecturers (43%), college lecturers (40%), individual teachers (35%) and education stakeholders (10%), either remain neutral or do not provide a response. A small proportion of college lecturers (7%), individual teachers (4%) and parents/carers (4%) indicate that they do not support the proposal.



Perspective	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No response
College lecturer	13%	40%	40%	7%	0%	0%
Education stakeholder	5%	67%	10%	0%	0%	19%
Government organisations	0%	100%	0%	0%	0%	0%
Individual teacher	17%	44%	29%	2%	2%	6%
Local authority	0%	100%	0%	0%	0%	0%
Local authority officer(s)	40%	55%	5%	0%	0%	0%
National educational body	20%	60%	20%	0%	0%	0%
Parent(s)/carer(s)	4%	13%	26%	4%	0%	52%
Student/pupil	0%	0%	0%	0%	0%	100%
University lecturer	29%	29%	43%	0%	0%	0%
Total	16%	43%	26%	2%	1%	11%

22.2 Qualitative analysis

22.2.1 Comments expressing support for the proposal

Colleges Scotland, along with four colleges, expresses support for this change in terms of effective execution of regulatory powers related to safeguarding both the teaching profession in Scotland and the young and adult learners being taught. The respondents request clarity on how this change will support election processes, however they state that the overall regulatory purpose requirements make sense.

The NASUWT expresses support for this proposal, with the caveat that teachers must be clearly informed, and their data treated appropriately and in accordance with the General Data Protection Regulations (GDPR).

The Educational Institute of Scotland expresses support for the proposal, stating that they accept that it may be necessary to retain this information for regulation purposes.

A few respondents express general support, with the caveat that this respects General Data Protection Regulations (GDPR).

22.2.2 Suggestions about the proposal

The Educational Institute of Scotland suggests that retention of data in relation to previous employers be restricted to a period of five years.

Colleges Scotland, along with four colleges, suggests that clarity is needed on how this change will support election processes.

22.2.3 Comments expressing concern about the proposal

Stakeholder concerns

The Educational Institute of Scotland requests clarity on the statement in Schedule 1 of the draft rules which lists the information that will be retained on the register, noting that it is not clear how all previous contact details and employment information would be relevant, especially when updated contact details have been provided. The respondent notes that any retention period must be reasonable in terms of General Data Protection Regulations and fully justifiable.

Respondent concerns

A few respondents express concern about the proposals, specifically:

- that the information retained should not be publicly available;
- that holding of extra data is not justifiable;
- that it is unclear why it is necessary to hold information about previous employment as it is unclear how this relates to registration.

One respondent expresses concern about the proposal for orders imposed by a Fitness to Teach Panel to be publicly available. The respondent suggests that this may be unfair, as it could negatively impact a teacher's future employability and reputation, as well as potentially negatively impact a school if they have multiple teachers with orders from a Fitness to Teach Panel on their records.

23. GTC Scotland is committed to ensuring equality, diversity and inclusion in all its work. Please tell us if you consider that any of the proposals for the new Registration Rules, as set out in this consultation, will create any equality, diversity and inclusion impact(s) - positive or negative - on any individuals who may be affected by or utilise the rules.

23.1 Qualitative analysis

23.1.1 Comments expressing support for the Equality, Diversity and Inclusion aspects of the proposal

Education Scotland express support, noting that the proposals as planned should support an enhanced approach to equality, diversity and inclusion, stating that the provision of the Equality Impact Assessment (EQIA) as part of the consultation was helpful. The respondent suggests however that equality, diversity and inclusion impacts continue to be monitored.

Bòrd na Gàidhlig and one other stakeholder express general support, without providing further detail.

Some respondents express general support, making general statements that the proposals seem 'fair' and noting that they don't have any specific concerns.

23.1.2 Suggestions for improving Equality, Diversity and Inclusion

One respondent suggests inclusion of explicit reference to reasonable adjustments and accessibility. This respondent notes that the paragraph at the start of the standards for full registration explains teacher's entitlement to reasonable adjustments, stating that a paragraph such as this in the Rules affirms teachers' right to reasonable adjustments. The respondent suggests that inclusion of such a statement in the revised Rules would explicitly acknowledge GTC Scotland's commitment to the needs of teachers with disability and affirm the value of disabled teachers in Scottish education.

One respondent suggests that GTC Scotland should follow the Equality Act 2010, specifically for protected characteristics, without providing further detail.

One respondent suggests that fees be pro rata for part time staff to avoid discrimination, without providing further detail.

23.1.3 Comments expressing concern about the Equality, Diversity and Inclusion aspects of the proposal

Stakeholder concerns

Colleges Scotland, along with five colleges, express the following concerns:

- that the proposed date for the grandparenting scheme will result in some college lecturing staff being unfairly excluded from registering with GTC Scotland, suggesting that this will disproportionately impact younger lecturers who have more recently joined the sector;
- that removal of the Provisional (Conditional) registration could also impact upon equality and equity for the lecturer workforce;

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- that the proposed move from a 'panel process' to 'formal internal review', with one individual reviewing decisions, may disproportionately impact those with protected characteristics due to lack of diversity in the review process.

The Educational Institute of Scotland expresses concern about the potential negative impact on equality, equity, diversity and inclusion of the proposal to remove the category of Provisional (Conditional) registration and of the proposal to limit the transitional or grandparenting provisions of interim registration to a narrow section of the existing workforce of college lecturers. The respondent expresses concern that these proposals may impact negatively on the diversity within the profession, noting that these may add barriers to registration routes for women returning from periods of family related absence.

Edinburgh Steiner School and Drumduan School express concerns about the potential significant negative impact of the proposals on the independent school sector. The respondents express concern that the proposals may limit diversity and be exclusionary as they do not give due regard to diverse approaches to education. These respondents note that any potential adverse impact on the operation of Steiner/Waldorf schools threatens to restrict diversity of provision in Scotland's education system, suggesting that this would therefore restrict equality of opportunity for pupils requiring alternative approaches to learning.

The Scottish Council of Independent Schools expresses concern that removal of the Additional Support Needs registration category and the proposed 2-tier model of Primary and Secondary registration discriminates against staff in independent schools. The respondent questions where the Named School Only category features in the proposals, noting the need to clarify registration for schools that offer alternative curricular models, specifically Steiner, Preparatory and International Baccalaureate. The respondent states that in their view the proposal is not inclusive and does not support diversity.

Some stakeholders and respondents express concern about the potential negative impact of the proposals on teachers with international qualifications, noting that any delay in allowing staff who obtained teaching qualifications from outside of Scotland to register has the potential to be discriminatory. The same respondents note the diversity of experience that international staff bring to Scottish education, urging that this issue be addressed as soon as practicable.

Respondent concerns

Many respondents express concern about the potential of the proposals to reduce diversity, specifically:

- the significant negative impact of removal of the Named School Only category on diversity within Steiner/Waldorf schools;
- the significant negative impact of the removal of the Provisional (Conditional) registration category on diversity of background and experience within Scottish education;
- the significant negative impact on vulnerable pupils outside of mainstream provision;
- the significant negative impact on overall diversity of educational provision in Scotland.

Some respondents express concern about the potential negative impact of the proposals on teachers with international experience and qualifications. Specific concerns include:

- teachers migrating to Scotland from international education systems, specifically mentioning England, the USA and Hong Kong;
- teachers who trained at international schools;

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- for teachers from countries experiencing conflict where it may be more challenging to provide evidence;
 - teachers trained in Scotland but who are returning to Scotland after a period teaching abroad, suggesting that Rule 7(b) and Rule 8 unfairly exclude teachers who work abroad for a period of time due to not being able to maintain PVG registration or provide a PVG update on request;
 - teachers with vocational or practitioner experience rather than coming through traditional qualification routes;
 - the impact of removal of the Provisional (Conditional) registration category on teachers who may have difficulty meeting the comparability qualification criteria.

A few respondents express general concern that the proposals are narrow and exclusionary to teachers from non-traditional backgrounds, noting that this may negatively impact diversity in Scottish education.

A few respondents express concern about the proposed removal of the Additional Support Needs category, suggesting that this ignores the level of specialism required to teach in a Special School and does not value the specialist skills of Additional Support Needs staff. A few respondents suggest that this is discriminatory towards Additional Support Needs pupils as it may reduce quality of provision they receive.

A few respondents express concern about the potential discriminatory impact of the proposals on:

- teachers who have taken a career break, including parental leave, noting that Associate status had previously helped address this issue;
- transgender people, stating that the requirement for registrants to state biological sex rather than gender is discriminatory. One respondent suggests that gender inclusive options be available in the registration process;
- teachers with disabilities
- teachers who are carers.

One respondent expresses concern about data privacy, suggesting that holding teachers' data on a publicly accessible website is a potential breach of privacy, noting the potential negative consequences if this data were to be used by parents, pupils or media. The respondent raises specific concern about potential misuse of this information in situations of domestic abuse.

One respondent expresses concern about timescales for enhanced registration, suggesting the need for flexible timescales to ensure inclusion of work/life balance and teacher workload. This respondent also expresses concern about additional costs incurred for enhanced registration, noting that this may create a barrier for some teachers.

24. Please share any additional comments you may wish to provide GTC Scotland on the proposed amendments to the current Registration and Standards Rules 2015.

24.1 Qualitative analysis

24.1.1 Additional comments expressing support

A few respondents express general support for the proposals, noting that they simplify and streamline the registration process.

One respondent expresses support, noting that the review provides the opportunity to have their Additional Support Needs expertise recognised.

One respondent expresses support for GTC Scotland becoming responsible for registration and regulation of College lecturers in Scotland.

24.1.2 Additional comments making suggestions

Education Scotland suggests that the proposed date for the changes to come into effect, 4 April 2022, be reviewed as this may present a challenge for effective communication across the profession.

Bòrd na Gàidhlig suggests further discussion and exploration, noting that they are happy to assist the team at GTC Scotland in providing a framework for registration that meets the needs of both the English-medium and Gaelic-medium sectors.

Children in Scotland suggests sharing their work in relation to additional support for learning, noting that they are happy to share their learning from children, young people and families on their needs and wants with regards to Additional Support Needs.

A few respondents suggest that further review and consultation is necessary, noting that the implementation date of April 2022 may need to be revised. These respondents further suggest that significant review is needed to ensure that the proposals fully represent the diversity of Scottish education.

A few respondents suggest that specialist qualifications be recognised financially, potentially using a points scale.

One respondent suggests inclusion of reasonable adjustments and accessibility in the Rules, noting that this would help disabled teachers feel acknowledged and supported by GTC Scotland.

One respondent suggests a hierarchy of Additional Support Needs teaching be established, similar to the points scale in teaching. This respondent suggests that this would recognise and reward qualifications, hard work and ongoing efforts by specialist teachers.

One respondent suggests that competences for Qualified Teachers of the Visually Impaired and Qualified Teachers of the Deaf be used as the criteria to measure performance of these specialist teachers, noting that the other GTC Scotland competences are too general. The respondent suggest that this may help focus the registrant on developing specific skills.

One respondent suggests that there is a need to encourage schools to create time and space for professional learning activities and conversations, particularly at ‘pinch points’ such as traditional sign-off times.

One respondent suggests consideration be given to workplace opportunities to gain Qualified Teacher Status, including for teachers from England and Wales who have gained Qualified Teacher Status through assessment only routes.

One respondent suggests that the GTC Scotland website be made more user friendly to enable professionals to register their ongoing professional development quickly and efficiently.

One respondent suggests that the ‘grandparent clause’ be applied equally across all categories.

One respondent suggests inclusion of Scottish Secondary Teachers’ Association in all decisions.

One respondent makes suggestions about the role of GTC Scotland. The respondent suggests that GTC Scotland regulate the contracts being issued by local authorities and/or school governing bodies and the remits of different roles within schools. This respondent further suggests that GTC Scotland be an impartial body that questions any abrupt, sudden or unexpected departures of teaching staff from the profession.

24.1.3 Additional comments expressing concern

Stakeholder concerns

The Educational Institute of Scotland expresses concern that there is no proposal to introduce greater flexibility in the collection of fees, including making provision for the option for members to pay by instalments. The respondent notes that payment of fees is a particular issue for part-time staff, the majority of whom are women, who may find that a large proportion of their monthly income is subsumed by a one-off annual subscription payment. The respondent requests that consideration be given to this issue, suggesting that the option be provided to pay the annual subscription in monthly instalments.

Colleges Scotland, along with five colleges, express a number of serious concerns. First, they express concern about the proposed wording of the Further Education category, noting that this is crucial to the success of the lecturer registration process and ongoing partnership working between the College sector, employers and employees and GTC Scotland. The respondents state that the ramifications of this description, if not fully considered, discussed and agreed in the most open and transparent way possible could be devastating to an essential part of the Scottish education system and school-college partnerships. Colleges Scotland directs GTC Scotland to the following website: <https://www.cdn.ac.uk/school-college-partnership-report-co-creating-learner-journey/>. The respondents strongly recommend that the description of this category be developed in a collegiate fashion between relevant groups, including where necessary school leaders and Local Authorities.

Second, the same respondents express concern about inclusion of the following sentence on page 13 of the consultation: ‘In the current context GTC Scotland has no information that TQFE provision is being prioritised to address the backlog of college lecturers who wish to undertake a teaching qualification.’ The respondents suggest that this is an unfair and unnecessary comment within the context of the consultation. They note that while this sentence may be related to the following paragraph, it is open to broad and potentially negative interpretation for the College sector. The respondents express concern that this sentence

undermines the significant partnership working invested into lecturer registration to date. Two colleges provide specific examples of investments made to support lecturer registration. Colleges Scotland suggest that representatives from the College sector would be happy to discuss with GTC Scotland how they are prioritising TQFE training to address the backlog of unqualified lecturers.

Third, the respondents express significant dissatisfaction about the process by which the consultation came about and the content of the consultation. They state that the mechanism in place to support joint working between College employers, Scottish Government, GTC Scotland, TQFE providers, and EIS-FELA, was not adequately informed of the content of the consultation, suggesting that clearer communication should have been forthcoming in the run up to the publication of the consultation. The respondents state that they are therefore aggrieved at the description of the Further Education category appearing with no prior discussion, noting that this has created a significant amount of bad feeling and concern over the direction of travel of the lecturer registration project. They state that the College sector requests that all parties adopt the learning coming from this process to inform future work.

Fourth, Colleges Scotland states that the sector considers the parameters of the existing, single Register of Teachers in Scotland to be restrictive for registration of the lecturer workforce. They note that this is a view shared by CLRWG partnership colleagues and suggests that this view is also shared by GTC Scotland. The respondents strongly advise and express support for an essential legislative change to allow a separate Register of Lecturers to be held by GTC Scotland. The respondents state that many of the issues highlighted in the sector response to the consultation could be rectified in full or in part by a separate Register of Lecturers being held by GTC Scotland. In undertaking any work to consider legislative change, the compulsion for lecturer registration could also be considered if deemed appropriate and/or necessary by relevant parties. It is vital that GTC Scotland registration is fit for purpose for the distinctive role, purpose and operations of the college sector as part of the tertiary education and landscape in Scotland, along with universities, and that we avoid a potential 'make do' outcome which will have important, and possibly unintended, consequences for the profession of College lecturers and the workforce as a whole. On that basis the respondents strongly urge legislative change.

Glasgow Clyde College expresses the following specific concerns:

- lack of legislative backing for registration for enforcement;
- substantial risk of inconsistency of application across colleges due to criteria being based on a national agreement;
- lack of clarity about consequences if someone refuses to register, or wishes no longer to be registered, but continues to be employed by a college;
- lack of clarity about what happens if GTC Scotland remove someone from the register but a college does not have grounds for dismissal. The respondent requests clarity on the legal basis by which a college could dismiss a lecturer for being removed or removing themselves from the register;
- that TQFE as the standard for registration is not appropriate for staff on fractional contracts, suggesting that it is necessary to reform the teacher education system for colleges from the ground up, noting that this process should not be led by Higher Educational Institutions (HEIs).

Drumduan School and Edinburgh Steiner School express concern about retention of the Named School Only category, suggesting the development of a Steiner Schools Only registration as a preferable alternative.

The Scottish Council of Independent Schools requests that GTC Scotland address the lack of registration options for certain specialist and subject categories, for example Photography and Outdoor Education.

The Edinburgh Steiner Teacher Education Course expresses concern at the lack of communication from GTC Scotland since a meeting between GTC Scotland and the Edinburgh Teacher Education Course on 16th September 2020. The respondent notes the people present at the meeting and requests clarity about the impact of these proposals on the agreement to recognise the ESTEC Programme as providing Teaching Qualified status and a bespoke Steiner registration category. The respondent notes that it is imperative for Edinburgh Steiner Teacher Education Course to know where it stands with regard to potential GTC Scotland registration for graduates, noting that current students are expecting to be eligible for registration.

Respondent concerns

Many respondents express serious concern about the potential impact of the changes to Registration Categories on schools in the independent sector, noting that the proposals are not suitable for specialist teachers and instructors. These respondents request retention of the Provisional registration and Named School Only categories, urging that any amendments to the current Registration Rules not compromise the ability to recruit and retain specialised staff and teachers with Waldorf education expertise. Many of these respondents note that the British Education Research Association's (BERA) Manifesto for Education for Environmental Sustainability 2021 suggestions for education are integral to the Steiner approach. One respondent states that they feel threatened and saddened by the proposed changes.

A few respondents express concern about the registration process increasing workload pressure. Specific issues mentioned include:

- the reference requirement, suggesting a 'tick box' style questionnaire be used to enable ease of completion;
- potential bureaucracy for existing registrants, requesting automatic transfer onto the new system;
- the annual 'sign off', suggesting that this is unnecessarily bureaucratic and not representative of quality of practice;
- problems with the GTC Scotland website, noting that the website is often 'down';
- submission requirements for probationers when moving to full registration, suggesting that the process is too bureaucratic and that use of mentor and Headteacher reports may be more representative and effective.

A few respondents express concern about the lack of detail included in the consultation, specifically for enhanced registration, the Frameworks and for teachers currently in post under Provisional (Conditional) registration. The same respondents question the usefulness of a consultation without sufficient information and suggest that the timeframe for consultation was insufficient.

A few respondents express concern about the proposed timeframe for implementation, suggesting that this is unnecessarily rushed.

One respondent expresses concern about the potential negative impact on the independent special school sector, particularly schools which offer a range of subjects in the Broad General Education and Senior Phase. The respondent notes that, as indicated in the PU Validation returns from Educating through Care Scotland, their teachers are required to have a

comprehensive knowledge of a range of subjects beyond their own registered specialist subject. The respondent therefore expresses concern that the proposed expectation that teachers can only teach their registered subject would severely reduce the curriculum on offer. The respondent suggests further dialogue to explore and understand this issue.

One respondent expresses concern about equivalency for international qualifications, suggesting that not recognising some qualifications is discriminatory.

One respondent expresses concern about lack of recognition of registration with other bodies, suggesting that other registration bodies should be recognised by GTC Scotland.

One respondent expresses concern about the level of control the proposals will create over teaching content, suggesting that the proposals set a narrow path that will prevent fulfilment and enjoyment of the profession.

One respondent expresses concern about the speed at which the fee and registration for Further Education lecturers has been decided.

One respondent expresses concern about removal of the Additional Support Needs category, suggesting that this avoids responsibility towards children with additional needs who are not able to cope with a class teacher.

One respondent expresses concern about Professional Update for supply staff, noting that this process is ineffective for staff not in post within one establishment.