GTC Scotland

College Lecturer Registration – Standard for Provisional Registration (Lecturers in Scotland's Colleges) Consultation Analysis

Section 1: Introduction and Methodology

1.1. Background to the consultation

In March 2018 Colleges Scotland Employers Association and the EIS - Further Education Lecturers' Association (EIS-FELA) agreed that mandatory GTC Scotland registration was part of the outcome of national bargaining (NJNC Circular 03/18). Registration with GTC Scotland forms part of the agreed national terms and conditions of employment for all college lecturers under the harmonisation arrangements. Therefore, while registration for college lecturers is not a legislative requirement as it is for school teachers, it is an employment requirement.

Under current Registration and Standards Rules GTC Scotland can and has registered lecturers as further education teachers who hold a recognised teaching qualification, or the equivalent for those qualified outside Scotland.

In March 2022 we provided an update to our partners about the outcomes of GTC Scotland's work in reviewing our registration rules. By way of summary, a consultation outlining proposed changes to the existing GTC Scotland Registration and Standards Rules 2015 closed in January 2022. GTC Scotland's governing Council considered what action was needed in response to the feedback provided and determined that there was a need for further engagement and consultation with partners.

As a result, new registration rules did not come into place from April as originally planned and GTC Scotland has continued to operate within the Registration and Standards Rules 2015. The registration rules form one of the main policy pillars for GTC Scotland and are our legal position in terms of registration requirements – essentially, they outline what it means to be identified as a teacher in Scotland.

The consultation on proposed new registration rules included a proposal for a category of interim registration as a grandparenting mechanism for the existing college lecturer workforce who do not yet have a teaching qualification to access the Register of Teachers. Having a teaching qualification remains central to what it means to be part of the Register of Teachers in Scotland. The longstanding policy position of GTC Scotland's Council is that experience or service alone is not a route to registration. What a teaching qualification constitutes is set out in schedule 2 of the GTC Scotland Registration and Standards Rules 2015.

As the proposal for interim registration did not progress following consideration of consultation feedback, GTC Scotland has continued to work with our partners to seek a solution to support the current college lecturer workforce to gain registration within our existing framework. We have also continued to explore the legislative context that could provide a valuable lever for this programme of work.

To date there is no firm proposal that legislative change is likely to present any solution in the near or medium-term future.

This position led to another full review of the possible options to support registration for all current college lecturers, recognising that the phasing of registration is likely to continue to be

impacted by a group of lecturers not currently having eligibility to register. This review included exploring previous options that had been considered and put aside in order to propose interim registration.

The outcome of this review is a proposed solution that can be applied under the existing registration rules – Provisional (Conditional) Registration (PCR).

The Proposed Solution

For Provisional (Conditional) Registration (PCR) to be applied, and in alignment with the existing Registration and Standards Rules 2015, GTC Scotland must be assured through the application process that the applicant has met a relevant Standard for Provisional Registration, with this Standard for Provisional Registration acting as a standard for entry to the Register of Teachers.

In line with existing and established arrangements, individuals registered with PCR are provisionally registered on the condition that they complete a recognised teaching qualification within five years of registration. Individuals who do not complete a recognised teaching qualification within this timeframe, and therefore failing to meet the condition placed on their registration, may be removed from the Register of Teachers in accordance with Rule 12.4.3 of GTC Scotland's Registration and Standards Rules 2015. Provisional (Conditional) Registration is not an enduring category of registration and therefore an applicant could not reapply on the same basis.

There is currently no Professional Standard for Provisional Registration that applies to College Lecturers and so a draft Standard for Provisional Registration for Lecturers in Scotland's Colleges has been created. Under the 2011 Order, GTC Scotland's governing legislation, GTC Scotland is required to consult before establishing new standards and must have regard to any views expressed by those consulted.

GTC Scotland cannot use the existing Professional Standard for College Lecturers in this situation as it includes expected and aspirational elements and is not viewed as a mandatory benchmark.

It is proposed that the status of PCR is utilised for the registration of college lecturers who have not yet obtained a TQFE and are employed as a lecturer in a college in Scotland as of a set date. The date will be agreed in partnership with representatives in College Lecturer Registration Working Group (CLRWG) and will be subject to all required governance processes.

Whilst the term Standard for Provisional Registration is more commonly associated with teachers of school education, it is vital to stress that the creation of a Standard for Provisional Registration, and the use of Provisional (Conditional) Registration is the last and only remaining lawful route to registration for lecturers who do not yet meet the requirements of the Registration and Standards Rules 2015 under current policy arrangements.

1.2. The consultation

We consulted key stakeholders on a proposed Standard for Provisional Registration (Lecturers in Scotland's Colleges). While we appreciate that not all participants in the consultation may have wished to or felt able to answer all of the questions, participants were encouraged to answer questions as fully as they felt it appropriate.

The consultation ran for six weeks via an online survey, launching on 30th September 2022 and closing on 11th November 2022. 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).

GTC Scotland provided one document relating to this consultation:

- Draft Standard for Provisional Registration (Lecturers in Scotland's Colleges)

1.3. Methodology

GTC Scotland commissioned Social Research, ReImagined to carry out the processing, coding and reporting of consultation responses. Social Research, ReImagined is an established research consultancy providing professional support in all aspects of public consultation, data analysis and reporting.

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.

1.4. Coding

Thematic coding was used to capture all open comments made within the consultation. 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
- Comments providing 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.

1.5. Quantitative and qualitative analysis

The consultation contained 1 closed question and used a Likert scale to capture responses. Respondents were able to provide further free-text comments on the proposal. Both quantitative and qualitative data were analysed.

Quantitative analysis

A bar chart illustrating the response to the main closed Likert consultation question is provided. While further breakdown of the data by perspective group is provided, it should be noted that the limited number of responses per group reduces the reliability.

Qualitative analysis

In order to indicate the relative weight of the summarised qualitative comments, in other words to make is 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'

1.6. Equality, diversity and inclusion impacts

The consultation included the opportunity to comment on equality, diversity and inclusion impacts. These responses were analysed separately. A summary of these responses is provided.

1.7. Participation

During the 6-week consultation period GTC Scotland received 52 responses to the consultation. The majority (30) of respondents were either individual teachers or college lecturers. College Management or Human Resources formed the third largest group with 10 respondents.

| Perspective	Count	Percentage
Government organisations	0	0%
Parent(s)/carer(s)	0	0%
Student/pupil	1	2%
Another perspective	1	2%
University lecturer	2	4%
Education stakeholder	2	4%
National educational body	3	6%
Local authority officer(s)	3	6%
College Management / Human Resources	10	19%
College lecturer	15	29%
Individual teacher	15	29%
TOTAL	52	100%

Section 2: Consultation responses

To what extent do you agree with the content of the proposed Draft Standard for Provisional Registration (Lecturers in Scotland's Colleges)?

2.1. Quantitative analysis

The majority (58%) of respondents either strongly agreed or agreed with the proposal. A further 14% remained neutral with just over one quarter (28%) of respondents indicating that they either disagree or strongly disagree with the proposal.

When analysed by perspective, the groups indicating support for the proposal are local authority officers (100%), college management/human resources (60%) and college lecturers (58%). The views from individual teachers are mixed, with nearly half (46%) expressing support for the proposal while a further 40% state that they disagree with the proposal. Similarly, the views of education stakeholders and national educational bodies are mixed expressing both agreement and disagreement with the proposals. Just over one fifth (21%) of college lecturers and college management/human resources (20%) state that they disagree with the proposal.

It is important to note however that the low number of responses per perspective group reduces the reliability of the data when analysed by perspective.
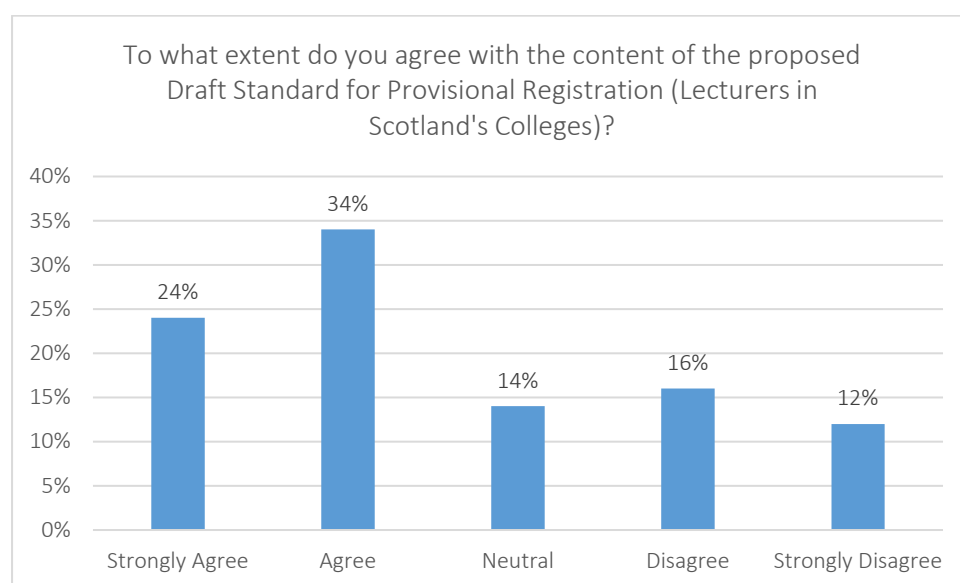
Perspective	Strongly Agree	Agree	Neutral	Disagree	Strongly disagree
Another perspective	0%	0%	0%	100%	0%
College lecturer	29%	29%	21%	7%	14%
College Management / Human Resources	20%	40%	20%	10%	10%
Education stakeholder	50%	0%	0%	50%	0%
Individual teacher	13%	33%	13%	27%	13%
Local authority officer(s)	33%	67%	0%	0%	0%
National educational body	50%	0%	0%	0%	50%
Student/pupil	100%	0%	0%	0%	0%
University lecturer	0%	100%	0%	0%	0%
Total	**24%**	**34%**	**14%**	**16%**	**12%**

2.2. Qualitative analysis

2.2.1 Comments expressing support for the proposal

EIS-FELA welcomes the proposal, noting that Provisional (Conditional) Registration offers an immediate route to access the Register of Teachers for all college lecturers in the existing workforce. EIS-FELA further recognises that creation of the Provisional (Conditional) Registration route requires the creation of a Standard for Provisional Registration.

College Employers Scotland, along with seven colleges, welcomes the proposal, stating that the content of the Draft Standard is reasonable in terms of expectations and reflects the qualities and skills of the existing workforce. The sector further supports the focus on professional values included within the Draft Standard.

A few respondents express general support for the proposal, welcoming the opportunity to implement benchmarks and standards for the profession.

2.2.2 Comments providing suggestions about the proposal

EIS-FELA offer the following suggestions to clarify and strengthen the proposed Standard:

- EIS-FELA suggest inclusion of a specified date to clearly define the group of lecturers to whom the Standard applies. They suggest that a date provides specificity and should replace the use of the terms 'existing' and 'currently' within the proposed Standard, stating that in their view these terms do not provide a clear timeframe.
- EIS-FELA suggest merging the first two sentences of the Standard to improve clarity. They suggest the first sentence reads as: 'This Professional Standard, known as the Standard for Provisional Registration (Lecturers – in Scotland's Colleges) (SPRL), outlines entry criteria to the Register of Teachers in Scotland for existing college lecturers who do not currently meet the registration requirements for Full Registration.'
- EIS-FELA suggest re-phrasing of the third sentence in the Introduction of the Draft Standard to remove the implication that the Standard is not part of the criteria for registration under the 2015 Rules and ensure clarity that the Professional Standard is understood as forming part of the registration requirements outlined in the 2015 Rules. EIS-FELA suggest re-phrasing the sentence to read: 'Being assessed to meet this Professional Standard, together with the other registration requirements set out in the Registration and Standards Rules 2015.'
- EIS-FELA suggest replacing the word 'learners' with 'students' throughout the proposed Standard to ensure consistency in terminology.
- EIS-FELA suggests that consideration be given to the development of joint training to promote a clear understanding across the sector of the purpose of the Standard and how it should be used in practice to support the registration process.
- EIS-FELA suggests that sections 2.1.1, 2.1.2, 2.1.3 and 2.2.1 are redrafted as follows to improve clarity and more accurately reflect the values, safeguarding responsibilities and terminology within the college sector:

  '2.1.1 Understand your role and the impact of this on students and society as a whole, by supporting individuals to learn and develop, by upholding the professional values of:

  - Students at the centre

  - Leadership of learning

- Continuous professional development.'

'2.1.2 Recognise the trust placed in college lecturers to effectively teach and to act in a way which supports the safety and wellbeing of students. By acting with integrity and professionalism in all that you do, you commit to social justice and work to provide students, their communities and the public with trust and confidence in those who teach, honouring teaching as a trusted and respected profession.'

'2.1.3 Engage in learning, reflection, enquiry, leadership of learning and collaborative practice as key aspects of your professionalism and the support and development of the wider profession. This commitment to the profession, to professional learning, to the development of students, and to helping support that of colleagues, is demonstrated through all aspects of your professional practice. It is demonstrated by working collegially, with enthusiasm, adaptability, critical thinking and associated constructive professional dialogue.'

'2.2.1 Support the safety and wellbeing of students, being fair and effectively managing your assumptions and personal beliefs.'

Implementation

West College Scotland suggests that endorsement for registration be delegated to suitable staff within colleges to help manage the process and reflect individual college shapes, sizes and scales. Similarly, they suggest that the proposal for line managers to sign off on the five yearly professional update also be delegated. They request clarity on who and how individuals who line manage teaching staff but are not themselves registered can access the required systems for sign off. They further suggest the need for clarity on what knowledge, skills and experience is required in order to judge not just the occurrence of CPD, but the quality of the professional learning undertaken.

Glasgow Kelvin College suggests that applicant sign off be undertaken by the educational institution employing the applicant, rather than another registrant. They suggest that the institution is best placed to advise on whether the applicant meets the Standard, providing a stronger and more workable assurance mechanism to GTC Scotland.

A few other respondents provide suggestions to clarify and strengthen implementation of the proposal. Suggestions include:

- Clarification on the registration expectations for both current and new college lecturers, specifically around requirements for staff on part-time, temporary or specialist ad-hoc contracts.
- Inclusion of a shorter time period for registration and fast-track route for staff in full-time posts, staff transitioning from industry, and for applicants in the second 'wave' of registration.
- Colleges sharing local school GTCS coordinators to support fast-track registration.
- That the full Professional Standards for Lecturers in Scotland's Colleges is more appropriate than Provisional registration for the cohort of experienced lecturers with relevant qualifications.

Learning for Sustainability

Learning for Sustainability Scotland and the Environmental Association for Universities and Colleges Scotland (EAUC-Scotland) suggest the need for more explicit acknowledgement of Learning for Sustainability as an underpinning theme to ensure that the Draft Standard is in

line with other GTC Scotland professional standards. They further suggest that acknowledgement of Learning for Sustainability as an underpinning theme in the new SPRL will enable demonstration of progression to the current Standards for Lecturers and set the scene for when the Professional Standard for College Lecturers is reviewed. They therefore suggest inclusion of an explicit expectation that college lecturers apply the principles and practices of sustainability across all aspects of the Standard to ensure that Scottish students' rights to sustainable education are met.

One respondent suggests the inclusion of meta-skills and learning for sustainability to ensure that all professional standards are applied within the Draft Standards.

Terminology and language

A few respondents provide suggestions to clarify and strengthen terminology and language. Suggestions include:

- References to 'teacher' in the Purpose section of the Draft Standard refer more explicitly to 'college lecturer' in recognition of the complexities of teaching, delivering learning and assessing across a wide range of tertiary sector partners and service users.
- Replacing the term 'Provisional' with either Contingent Registration or Conditional Registration to further strengthen the differentiation between schools and colleges.
- Increasing alignment with Conditional Registration Standards and Lecturer Professional Standards to ensure synergy across the documents, through using similar terminology and identifying explicit links.
- Inclusion of the phrase 'in line with awarding body requirements' in Section 2.2.4 to recognise that assessment activities are often outwith a lecturer's control.
- Explicit reference be made to the need to maintain professional knowledge, irrespective of subject area.

General suggestions

One respondent makes the following overarching suggestions for the Draft Standards:

- The Standard for Provisional Registration be part of a package of measures that includes a Memorandum on Entry Qualification that is comparable to the one used for teachers.
- Inclusion of professional actions and/or professional illustrations to clarify expectations for Professional Standards.
- Clarify whether there is any expectation that lecturers will be required to complete a probation period in a similar manner to teachers, referring to Section 3.2 of The General Teaching Council for Scotland Registration and Standards Rules (2015). They suggest that exploration of any inconsistencies between the requirements for teachers and lecturers may be useful.
- Undertake a review of Fitness to Teach practices to understand the potential of cases not being brought forward to GTC Scotland due to these being considered an employment rather than a professionalism issue. The respondent expresses concern that this may mask issues that would be highlighted in other sectors.

Aims and principles

EIS-FELA expresses concern about the claim that the Standard has a specific purpose of promoting the status of the teaching profession and to strengthen public confidence, suggesting that this is achieved through the professional practice of college lecturers rather than the Standard alone.

EIS-FELA expresses concern about the potential for misapplication or misinterpretation of the proposed draft Standard and the potential of an applicant being refused registration on the basis of not meeting this entry Standard without good and justifiable reason. EIS-FELA therefore suggests that the guidance that will accompany the Standard clearly explains the purpose of Provisional (Conditional) Registration as a vehicle to onboard the existing lecturer workforce. They suggest that care be taken to ensure the new Standard is not perceived as a higher Standard than the existing College Lecturer Professional Standards or used as an artificial barrier to accessing registration.

Learning for Sustainability Scotland and the Environmental Association for Universities and Colleges Scotland (EAUC-Scotland) express concern about the lack of explicit reference to Learning for Sustainability within the proposal. They suggest this is necessary to ensure that sustainability is embedded throughout the full qualification and career journey.

Terminology, language and definitions

EIS-FELA expresses concern about the use of 'may' in the following sentence: 'Being assessed to meet this Professional Standard, together with registration requirements set out in the Registration and Standards Rules 2015, may result in the award of provisional (conditional) registration in the category of further education with GTC Scotland.' They question the use of the word 'may', noting that if all requirements have been met then this should result in registration.

EIS-FELA expresses further concern about the final sentence in the introduction: 'The SPRL is the Relevant Standard for Provisional Registration for further education, as required by the Registration and Standards Rules 2015.' They suggest that this is not in line with Rule 1 of the Registration Rules and question the statutory basis for this definition. They suggest further clarity is needed on the relationship between the draft Professional Standard for Provisional Registration and the existing Professional Standards for Lecturers in Scotland's Colleges. EIS-FELA question the link between the creation of the proposed draft Standard and the 2015 Rules, suggesting that mapping the sections of the draft Standard to the existing Professional Standards would ensure compliance with the 2015 Rules and continuity between the Standards. They suggest that this approach would still cover all the aspects included by GTC Scotland in the draft Provisional Standard while preserving the integrity of the Register.

One respondent expresses concern about the difference in language use and emphasis between the Professional and Draft Standards, noting that some important parts of Sections 2 and 3 of the Professional Standards are not included in the Draft Standards. The respondent suggests that employers will have expectations of engagement beyond those included in the Draft Standards.

One respondent expresses concern that while there is a focus on professional values, knowledge, understanding and skills, there is no explicit reference to professional practice. They note that this may give the impression that registrants with Provisional Registration are not required to demonstrate professional practice.

One respondent expresses concern about the three stated professional values, suggesting that these are not values but rather broad areas of professional practice. The respondent questions how these would be consistently demonstrated through practice and suggests further illustration of what these would look like in practice to ensure suitable benchmarking for Professional Standards.

One respondent expresses concern about the terms used in section 2.1.2 and 2.1.3, specifically that the terms 'effectively teach', 'social justice' and 'collaborative practice' require definition to ensure consistency in understanding and interpretation. They also express concern that the underpinning reference to professionalism is not fully explained.

Similarly, the same respondent expresses concern that section 2.1.4 does not provide any definitions or illustrations of how an applicant could demonstrate professional commitment to provision of high-quality and effective teaching that promotes inclusive practices, equality and diversity. They suggest that further illustration is required to facilitate use of this benchmark for Professional Standards.

One respondent expresses concern about the phrasing of section 2.2.1, suggesting that the phrase 'manage your assumptions and personal beliefs' is problematic. They suggest that this appears to sanction beliefs that are contrary to the GTC Scotland values so long as these are managed while in your place of employment. The respondent questions whether this phrasing in is in alignment with the current Professional Standards which states: 'Values are core to the Standards and underpin the professional identity and aspirations of a lecturer. They shape everyday practice and engagement.'

One respondent expresses concern about the use of andragogy, noting that this is contested and suggesting use of a more neutral term.

One respondent expresses concern that the proposal reinforces a generic view of college lecturers, suggesting that it may be more appropriate to think of college lecturers as, for example, an Engineer who teaches, a joiner who teaches or a hairdresser who teaches to recognise professional expertise.

Implementation

While a few respondents welcome the aspirational tone of the Draft Standards, they express concern that this makes benchmarking difficult due to lack of measurability.

A few respondents express concern about the proposed fees, specifically questioning whether these should be paid by individual registrants or employers. These respondents raise concerns about affordability, question the rationale for the fee remaining the same for part-time and supply staff, and request that GTC Scotland commits to not raising the fee for the next 5 years. One respondent requests transparency of how the fee is used.

Glasgow Clyde College and one other respondent express concerns about the statement in Section 2.2 of the Registration & Standards Rules '…been recommended for registration in the additional part of the Register by a headteacher, principal or other GTCS approved individual.' The respondent suggests that clarity is required on who could fall into the category of GTCS approved individual and whether their view would be prioritised over a college principal's decision. These respondents also note that given the large number of staff within a college, it is unrealistic to suggest that a college principal would have sufficient knowledge of a specific member of teaching staff to enable recommendation for registration.

Glasgow Clyde College and one other respondent express further concerns about lack of clarity on the legal position if a college staff member refuses to gain registration. The respondents request urgent clarity on this matter.

One respondent notes that not all educators in colleges are lecturers and raises questions about how these roles will be classified, noting the potential financial implications for colleges if all educators are to be considered lecturers.

One respondent requests clarity on the implementation of the Standard, specifically regarding the procedure for assessing lecturers against the Standard before they gain provisional registration. Another respondent expresses concern about the potential for increased bureaucracy.

TQFE

A few respondents express concern about capacity within current TQFE provision, suggesting that funding and HEI capacity makes the 5-year registration target unrealistic. These respondents suggest that a significant increase in funding will be required to ensure sufficient TQFE places are available.

A few respondents express concern about the unequal impact of the 5-year time period for all staff to complete the required qualification, specifically for part-time staff, staff with caring responsibilities and for staff nearing retirement but who may wish to continue to work on a causal basis.

Workforce diversity

A few respondents express concern about the potential for the proposal to disincentivise transition from industry to teaching in the college sector, highlighting the importance of ensuring the qualification remains focused on professional and practical skills and knowledge. One respondent suggests the need for flexible models towards registration that recognise a variety of career trajectories and enables institution managers to lead on assessing practitioner standards and quality.

A few respondents express concern about the transition from industry, noting specific concern that the proposal does not recognise the breadth of qualifications and experience of those entering the sector. Respondents state that registration should not disincentivise transition into the college sector, and request that professional experience be taken into consideration within the new proposal. Clarity is also requested on registration requirements for specialist staff who may be on short-term, temporary or ad-hoc contracts.

One respondent expresses concern about the lack of support for teachers who have had periods away from their profession, for example due to maternity leave, and the perceived lack of support during the update process. The respondent states that this has resulted in practitioners leaving the profession.

General concerns

One respondent expresses concern about the negative impact on the GTC Scotland brand due to lecturers being added to the Register of teachers without a teaching qualification. The respondent suggests that this is problematic and may result in reputational damage, noting that these risks may be mitigated through rigorous and regular monitoring mechanisms.

One respondent expresses concern about the role of GTC Scotland, suggesting that it is not required.

2.3. Equality, diversity and inclusion impacts

GTC Scotland is committed to ensuring equality, diversity and inclusion in all its work. Please tell us if you consider that any of the draft Standard for Provisional Registration (Lecturers – in Scotland's Colleges) will create any equality, diversity and inclusion impact(s) – positive or negative – on any individuals who may be affected by or utilise the draft Standard for Provisional Registration (Lecturers – in Scotland's Colleges)

2.3.1 Comments expressing support for equality, diversity and inclusion impacts

College Employers Scotland, along with three colleges, express support for the Draft Standard, noting that while they are aware of concerns regarding inequality of access to the Register, they are satisfied that the Draft Standard is reasonable in the 'ask' of existing lecturers. They accept it would not be appropriate to allow entry to a category of Registration without an associated Standard.

EIS-FELA welcomes the proposal to use Provisional (Conditional) Registration as a grandparenting mechanism. They note however that they are also committed, as members of the CLRWG, to continuing to advance work already started around the review of the 2015 Rules and consider additional alternative routes to registration. They point to the potential of a jigsaw approach to be adopted or the potential for qualifications obtained within Scotland to be considered for equivalency to remove barriers to full registration throughout the duration of the Provisional (Conditional) Registration period.

A few individuals express general support for the equality, diversity and inclusion considerations included within the proposal, noting that they do not identify any negative impacts on individuals.

2.3.2 Comments providing suggestions about the equality, diversity and inclusion impacts

EIS-FELA suggests that further clarity is needed about whether a lecturer with a protected characteristic will be given any additional flexibility under the proposed rules. They request clarity about the potential outcomes when an applicant has either started the TQFE but have been unable to complete the course by the end of the five-year period or, alternatively, where as a result of the protected characteristic, there has been a delay in being able to access the course.

One respondent suggests that a more flexible approach that looks at individual cases is needed, including recognition of professional experience. They suggest that this may be a more inclusive approach and allow for a greater variety of pathways into the profession.

One respondent suggests that a detailed analysis of workforce data be conducted in advance of any changes being introduced to understand more about the group of lecturers in colleges who do not currently have TQFE (or other equivalent qualifications). They suggest that this will ensure provision of a sound, empirical foundation for a thorough Equality Impact Assessment.

Completion of TQFE

College Employers Scotland, along with six colleges, expresses concern from an employment relationship point of view about how the requirement to complete the TQFE may affect a minority of individuals. Concerns expressed include:

- That some staff may not wish to engage with TQFE in order to achieve full registration due to their age.
- Issues affecting part time staff gaining appropriate teaching hours/experience to be enrolled into a TQFE programme due to the required minimum teaching contact time. They note that this will specifically affect part time staff due to the impact on time taken to complete TQFE, raising concerns about the timeframe during which they can maintain Provisional Conditional Registration.

College Employers Scotland note that they would welcome discussion regarding how to accommodate genuine cases of this sort while ensuring operational requirements continue to be met. They suggest that appropriate Equality Impact Assessments for all groups with protected characteristics be undertaken prior to implementation to identify and enable discussion of unknown or unassessed factors.

A few respondents express concerns about unequal impact of the requirements to complete the TQFE on individuals with caring responsibilities. They suggest that the requirement to complete the TQFE will disproportionately affect working mothers and ultimately restrict diversity, equality and inclusion into the profession.

TQFE Funding

A few respondents express concerns about insufficient funding for TQFE programmes. They suggest that lack of funded places may force some lecturers to self-fund their studies, raising concerns about equality of access. These respondents suggest that increased Government funding is required to ensure equality of access.

Inverness College expresses concern about the cost of funding backfill for remitted time for TQFE candidates. They note that the cost for colleges means annual candidate numbers are necessarily restricted. They note that priority is given to lecturers who do not hold any teaching qualifications in order to maintain a high standard of learning and teaching across the whole organisation, raising concerns about access for qualified and experienced lecturers.

Fee structure

One respondent suggests that the failure to implement a pro rata fee structure for Lecturers in Scotland's Colleges contravenes the Part-time Workers (Prevention of Less Favourable Treatment) Regulations.

Differences from Professional Standard

One respondent expresses concern about parts of the Professional Standard not being included in the draft Standard, specifically Section 2.1.4 about adhering to applicable legislation and other elements of Section 2.1 around inclusion, social and economic factors.