

13th June 2023

School Organisation
Scottish Government
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Victoria Quay
Edinburgh
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By email: learninghoursconsultation@gov.scot

Dear Learning Hours consultation team

Prescribing the minimum annual number of learning hours

The General Teaching Council for Scotland ("GTC Scotland") welcomes the opportunity to consider this consultation on prescribing the minimum annual number of learning hours in all local authority and grant-aided schools in Scotland. We have the following comments to make.

This proposal has attracted opposing views since it was first introduced during the passage of the then Education (Scotland) Bill in 2015, which we believe goes some way to explaining why section 21 of the Education (Scotland) Act 2016 has remained unenacted in the seven years since the legislation was passed.

GTC Scotland's understanding is that the motivation for introducing this change now stems from the statement made by the previous Cabinet Secretary for Education and Skills to the Scottish Parliament on Tuesday 7 February 2023¹, in which she stated her commitment to further closing the attainment gap by ensuring that there was "*no reduction in the fundamentals of education delivery, including the number of teachers or support staff, and the amount of time children spend learning in schools*". This would be achieved through making funding available to local authorities with the specific purpose of maintaining teacher, support staff and probationer numbers, and commencing section 21 of the 2016 Act.

Clearly one of the most challenging aspects of this proposal will be ensuring that local authorities have adequate resources to meet these requirements and no doubt this will be the subject of much consideration if the proposal is taken forward. Local authorities and others will offer their views on that: what we would like to focus on in our response to this consultation is the definition of 'learning hours' and what the implications of that are.

Paragraph 2.1 of the consultation states that "*Learning hours are the period of teaching that learners receive within the school day... It has been accepted practice for at least the last 40 years that around 25 hours per week (or 950 hours per academic year) of teaching time is made available in most local authority run primary schools; and 27.5 hours per week (or 1045 hours per academic year) in most local authority run secondary schools*".

¹ [Teacher numbers and learning hours: Cabinet Secretary's statement - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/teacher-numbers-and-learning-hours/pages/1-1-teacher-numbers-and-learning-hours.aspx)

This seems to equate learning hours with teaching time. From the statement made by the former Cabinet Secretary, it would appear that the desired outcome of the proposal is not just to set a minimum number of learning hours but also a minimum standard, hence the corresponding need to make funding available for maintaining teacher numbers. To achieve this, we are of the view that any implementing regulations would need to provide a clearer definition of 'learning hours' to clarify that they must be delivered by a suitably qualified teaching professional. The lack of clarity on this point currently has been identified as a potential means of introducing alternative delivery, for example by using non-qualified individuals.

This raises further questions surrounding what constitutes 'suitably qualified'. As the independent registration and regulation body for the teaching profession, we use our voice to speak up for high standards, to build trust in the teaching profession and enhance the status of teaching². Professional standards are embedded in the requirements we set for Scotland's teaching profession for a reason, and our collective approach to providing quality education needs to take pride in these high standards and put checks and balances in place to ensure that system flexibility upholds them. This is integral to our vision of trusted teaching.

We have long advocated for there to be a clearer statutory definition of 'teacher' and, more specifically, what a 'teacher' requires to be employed to do by education service providers, as we believe that it would go a long way towards building clarity into the system and ensuring quality. Teaching is a complex profession, and a teaching qualification is core to what is required for GTC Scotland registration for this reason. By placing the definition of a teacher on a clearer statutory footing, our communities would have the reassurance that responsibility for curriculum design, assessment and learning and teaching rests with those who are qualified to do so.

GTC Scotland would welcome the opportunity to contribute to further discussions on any of the issues relevant to this consultation and specifically on the issues we have raised in our response.

Yours sincerely



Dr Pauline Stephen
Chief Executive and Registrar

² We published our new 5-year strategy [Trusted Teaching](#) in April this year