THE EDUCATIONAL INSTITUTE OF SCOTLAND

EIS Response to GTCS Consultation on the review of Registration and Standard Rules

1. Do you have any comments on our proposal to require applicants who have qualified outside Scotland to have completed teacher education that is broadly comparable to what is required of a teacher qualified in Scotland?

The EIS would have serious concerns about any change to the registration criteria which constituted a lowering of the bar in relation to entry to the GTCS register. Scotland has one of the best-qualified teacher workforces in the world and retaining an all-graduate profession is important to maintaining and enhancing our high standards. Only if the term 'broadly comparable' means adherence to the essential requirement that applicants hold a degree-level qualification and a relevant and credible teaching certificate would the EIS support this change.

The EIS recognises that this proposal will assist recruitment. However, recruitment issues cannot drive any dilution of standards.

2. Do you have any comments on our proposal to re-introduce a provisional (conditional) category of registration?

In light of the terms of the Education Bill which is currently progressing through the Scottish Parliament, and which will extend the requirement for GTCS registration to teachers within the Independent sector, a provisional (conditional) registration category is likely to be necessary if those teachers are to continue to practice.

The provisional (conditional) registration has implications for SNCT Handbook provisions, particularly in relation to using the category for "top up" purposes.

Careful monitoring would be essential in the event of such a category being introduced to avoid any erosion of quality within the profession overall.

Should the provisional (conditional) category of registration be reintroduced, the EIS would wish to see this open to teachers qualified in the Further Education sector who are seeking to transfer registration to another category.

Finally, in compliance with Equality legislation, careful equality monitoring would have to be in place in relation to race/ethnicity/nationality; age;

disability and gender, of applicants who were awarded provisional (conditional) registration in comparison to those awarded full registration.

3. Do you have any comments on our proposal to introduce a professional interview mechanism that may be used in some qualified outside Scotland applications that are more complex to assess and where we think having a face to face dialogue may be helpful in order to determine whether the applicant's qualifications meet our requirements?

The EIS is of the view that, in the interests of equality and diversity, an interview which is designed to give the opportunity to provide further detail to applicants who have qualified outside of Scotland, and whose applications may therefore be more difficult to assess, could be helpful.

The criteria for judging the necessity of such an interview should be the degree of complexity of the application, not simply the fact that the qualification of the applicant has been obtained outside of Scotland.

In the interests of fairness to applicants qualified in Scotland but in a different registration category, for example an applicant qualified in the FE sector seeking registration in the school sector, the same criteria should apply.

Again, careful equality monitoring would have to be in place in relation to the race ethnicity/nationality of the applicants who were invited to interview and, indeed, in relation to the outcomes of the process.

In the best spirit of Equality legislation, those who would be involved in conducting such face to face interviews should have received equality training, which includes specific focus on unconscious bias, prior to the interview process beginning, and this should be refreshed at regular intervals thereafter.

4. Do you have any comments on the other changes that we have proposed?

The EIS welcomes the Amendment Order to the Rehabilitation of Offenders Act and Amendment to the PVG Act. We recognise that this will have implications for members where a Chief Constable discloses spent or protected convictions under Other Relevant Information. It is unclear the extent to which GTCS is required to accept, as read, ORI, whether this will be a matter to be considered by GTCS at its discretion or a matter for employers to found upon when recruiting.