

THE EDUCATIONAL INSTITUTE OF SCOTLAND

Consultation on the Review of GTC Scotland Professional Standards

Response from the EIS

Please answer the questions outlined below and use the boxes to provide further comment should you wish to. * Indicates required information.

Please provide your name or the name of the organisation you are responding on behalf of:*

The Educational Institute of Scotland

Please provide us with your email address:*

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Introduction

The introduction sets out the thinking and the context for the revised Professional Standards, which requires the reconceptualisation of the teaching profession in Scotland.

Q1 How clear is this description of the reasons for introducing revised standards and of their content?*

Not that clear

Comments:

- 1.1 The Educational Institute of Scotland welcomes this opportunity to respond to Review of Professional Standards. The EIS represents around 58,000 teachers and lecturers (approximately 80% of the profession) across Scotland.
- 1.2 The EIS supports the work of the GTCS as an independent, democratic, regulatory body for the teaching profession in Scotland. Further, the EIS recognises that, given the pace of change in society and in education, it is important that GTCS Standards and their contents are regularly reviewed. It is disappointing that the consultation does not cover the merit of the review but simply the clarity of the proposals. This point is expanded in our covering letter.
- 1.3 The EIS believes that the quality of teacher education lies at the heart of the Scottish educational system. The major strengths of the current system in Scotland are that teachers in Scotland are educated and trained to a very high standard; are registered with an independent professional body which maintains and enhances teaching standards; and have opportunities for professional development throughout their careers.

- 1.4 The reference to *Teaching Scotland's Future* seems to imply an uncritical acceptance of all that is contained within that report. The EIS believes that whilst the report has much to commend it as the basis for further developing teacher professionalism, its findings should not be wholly uncontested and therefore the EIS finds the tone of the GTC response to be disappointing. Phrases such as '*reconceptualising the teaching profession*' seem unnecessarily dismissive of current practice in Scotland.

Further, throughout the documents phrases can be found, such as '*transformative change in practice*', which imply that Scotland's teachers are not doing a good job. Wording with such implications should be removed or revisited.

- 1.5 Reference is made to the "*moral imperative*" of the profession "*to secure the best learning opportunities and experiences for all learners in Scotland*".

Whilst it is accepted that teachers should seek to achieve this aim, the statement wrongly suggests that this is the sole responsibility of the profession, ignoring the current financial circumstances under which Scotland's schools and teachers operate. The sentence should be either amended or removed.

- 1.6 Some of the language used in the Introduction is not at all clear and as a result the Standards are at risk of not commanding the respect and support of Scotland's teachers. Of particular concern to the EIS is the use of phrases such as "*adaptive experts*", "*knowledge creators*" and "*leaders of educational improvement*". Teachers are leaders of learning given their key role in making a difference in promoting attainment and achievement. Teachers will only successfully "lead learning" in the classroom and / or contribute beyond the classroom relative to the prevailing culture of support, collegiality and collaboration, and the allocation of time and resources.

- 1.7 The EIS notes that the Standards are referred to in the Purpose Section as "challenging" and "*aspirational*". This suggests that Standards and their application should not be confused, or applied, as a set of competencies which are normally seen as set pattern of superficial behaviours. The holistic and aspirational nature of the Standards underlines the importance of the capacity of teachers to reflect and to self-evaluate, and the organisational capacity to promote collegiality and collaboration.

- 1.8 The Standards are to be used for multiple purposes, but some of these lie outwith the remit of the GTCS to determine. The EIS remains concerned that the Standards as currently proposed may be misused by others.

Values

For the first time, the same values are replicated across each standard, in recognition that these are the same for all teachers, irrespective of experience and stage in career.

Q2 Does the values section in each standard include the appropriate values for the teaching profession in Scotland?*

YES

Comments:

- 2.1 The EIS recognises the importance accorded to Professional Values in the documentation. While acknowledging that Professional Values permeated previous Standards, the EIS welcomes the explicit reference to Values in a separate section in the revised updated version.
- 2.2 A specific reference to the principle of developing and maintaining collegiate working practices in schools should be inserted as one of the key Professional Values for Scotland's teachers.

Leadership

Leadership is explicit across the Professional Standards, with a focus on teacher leadership, leadership for learning and building leadership capacity in others.

Q3 How effectively does the framework of standards reflect the development of leadership qualities in teachers?*

Clear

Comments:

- 3.1 The EIS recognises that teachers possess leadership qualities that enable them to take the initiative in driving forward innovative teaching and learning. Leadership is not just about a teacher's level of promotion and fulfilling management tasks. While the EIS fully recognises and acknowledges the roles and responsibilities of school management teams, it is equally sure of the importance of leadership at all levels within the teaching profession.
- 3.2 The development of collegiate working practices in schools varies across Scotland and within local authorities. This is problematic since collegiate working practices are designed to utilise the many diverse skills of the entire teaching profession. It is important that effective leadership is recognised and encouraged at all levels. This recognition and encouragement will facilitate Scotland's teachers in taking the lead on important issues such as curricular change. This will bring real tangible benefits to Scotland's education system and for Scotland's pupils.

- 3.3 Teachers can lead successfully only where the culture in any given school or environment encourages and supports their professional views. Professional trust, respect, confidence and parity of esteem in educational and professional matters is key to successful improvement and change. This is quite separate from the routine administration and decision-making processes to which teachers contribute and for which managers assume responsibility.

Sustainability

Learning for sustainability has been embedded within the framework in order to support teachers in embracing and promoting principles and practices of sustainability in all aspects of their work.

Q4 How effectively does the framework of standards reflect the importance of learning for sustainability?*

With regard to the Standards for Registration

Not that clear

With regard to the Standard for Career-Long Professional Learning

Not at all clear

With regard to the Standard for Leadership and Management

Very clear

Comments:

- 4.1 The EIS recommends that the GTCS makes clear the difference between "*sustainability*" as used in terms of Environmental Science and the concept of "*sustaining*" professional development over a career.
- 4.2 With regard to the Standards for Registration, the word "*sustainability*" is used only twice. Firstly, when teachers are urged to embrace the educational and social values of sustainability and secondly, in the Standard 2.1.2, where teachers have to:
- "work with the local and global community and beyond the school and beyond the profession in order to develop realistic and coherent interdisciplinary contexts for learning, particularly in relation to sustainability."*
- 4.3 The EIS is of the view that student teachers should also be required "...to develop realistic and coherent interdisciplinary contexts for learning, particularly in relation to sustainability" and recommends that some reference to this should be made in the Standard for Provisional Registration.

- 4.4 With regard to the Standard for Career-Long Professional Learning, the word "*sustainability*" is used only once when teachers are again urged to embrace the educational and social values of sustainability. Without further exemplification and detail from GTCS, this single reference to "*sustainability*" is insufficient to conclude that it has been "*embedded*" in this particular Standard.
- 4.5 With regard to the Standard for Leadership and Management, the issue of "*sustainability*" is very clear. In particular, the EIS welcomes the setting of clear standards in relation to enacting the principles of sustainability (Standard 4.3.1) and the consideration of the sustainability implications of resourcing decisions (Standard 4.5.1).

The Standards for Registration

The Standards for Registration incorporate the Standard for Provisional Registration and the Standard for Full Registration, with professional actions detailed at two levels.

Q5 Is it useful to have these two standards within the one document?*

YES

Comments:

- 5.1 Incorporating these two standards within the one document is an important means of building continuity between initial teacher education, provisional registration and full registration. In terms of the quality support agenda, combining the initial teacher expectations with the Standard for Registration as a continuum is a logical progression.
- 5.2 The use of the same model allows for clear progression from one standard to the next to be effectively planned and clearly recorded.
- 5.3 The EIS believes that it will be helpful in that it will provide practical assistance to probationer teachers by making clear the ways in which they will develop their professionalism over the induction year.

Q6 How effectively do these two standards articulate the progression from Initial Teacher Education to the early phase of a registered teacher's career?*

Clear

Comments:

- 6.1 The use of the phrase '*early phase*' is misleading. The Standard for Full Registration should have a career long relevance to teachers.
- 6.2 These standards articulate the progression from Initial Teacher Education to the early phase of a registered teacher's career.
- 6.3 More generally, the EIS believes that this document should make clearer reference to the legislative context which determines the educational context in which teachers work in Scotland and the implications for their practice. In particular, reference should be made to *the Standards in Scotland's Schools etc Act 2000; the Education (Additional Support for Learning) (Scotland) Act 2004; and the Equality Act 2010*.
- 6.4 The attainment of the Standard for Full Registration will require certain conditions to be fulfilled. In particular, teachers on the induction scheme must be guaranteed employment within a single school; staff within the school must be afforded time to support probationers; and well-planned support must be provided by the local authorities to mentors and the probationer teacher.

Q7 How appropriate are the benchmarks and assessment provided by the Standards for Registration in order to award related qualifications and registration?*

Not that clear.

Comments:

- 7.1 These Standards must be applied in a holistic manner and should not be used as a check-list. Teaching cannot be condensed to a checklist of knowledge and a restricted assembly of pre-defined activities. The exemplification of Professional Actions cannot be treated as a list of discrete exercises which all teachers should demonstrate in unrelated actions. This should be made clear by GTCS. The Professional Actions should be used in a holistic way to determine whether a teacher's practice meets the criteria for Registration with the GTCS.
- 7.2 Further, the EIS believes that these Standards should be applied consistently and uniformly across Scotland and within its local education authorities. The Standards should recognise and clarify the expectations held of Scotland's teachers by parents, pupils, the wider public and by teachers themselves. Since these Standards have been revised to support the professional development of teachers and to exemplify "*...what it means to be a teacher in Scotland in the 21st Century*", there is a clear role for the GTCS to develop additional support materials for all involved in order to achieve this. The additional support materials would not only be intrinsically beneficial to the teaching profession and the employing authorities, but would also go a large way to ensuring uniformity of application of the revised Standards across Scotland.
- 7.3 The EIS has major concerns regarding how these Standards will be interpreted and applied. Particular concern is expressed over the language and phrases such as "*secure detailed understanding*"; "*in-depth secure knowledge*" as opposed to "*extensive knowledge*" and/or "*secure working knowledge*"; and "*consistently select creative and imaginative strategies for teaching and learning*."
- 7.4 There are Professional Actions which appear inappropriate and somewhat meaningless. For example, teachers will '*have knowledge and understanding of the ways in which natural, social, cultural, political and economic systems function and of how they are interconnected to professional practice*.' A simpler expression of professional actions and ideas would be beneficial.
- 7.5 While these Standards are aspirational goals that teachers strive to obtain, many are resource dependent and are unrealistic in the current financial situation. As such, it is highly questionable whether these criteria, as currently articulated, are objective enough to be part of the Standards for Registration.

- 7.6 The main focus must emphasise an analysis and synthesis which demonstrates critical reflection and self-evaluation as part of a framework of professional development.
- 7.7 The Standard for Registration (SFR) is a holistic standard and certainly it should be a point of reference for all teachers and a basis for professional actions. It is important to challenge any attempt to match actions to points in the SFR in a superficial exercise. The purpose of the SFR is not to reduce and close down critical reflection and professional self-evaluation but to support, promote and encourage these in pursuit of achieving properly resourced improvement for all teachers and learners.

The Standard for Career-Long Professional Learning

The Standard for Career-Long Professional Learning provides a framework for experienced teachers to develop and advance practice as they progress throughout their careers.

Q8 How effectively does the Standard for Career-Long Professional Learning meet the needs of experienced teachers to develop practice?*

Not at all clear.

Comments:

- 8.1 The EIS has major difficulty in interpreting the Standard for Career-Long Professional Learning as a "Standard". The purpose of any Standard is to support teachers and to recognise and clarify the expectations held of Scotland's teachers in their professional role by teachers, parents, pupils and the wider public.

What is offered is perhaps the basis for looking at a framework for professional development but the EIS is clear in its rejection of this draft standard as a useful or meaningful way forward for the profession. In rejecting this proposal the EIS is mindful of the propensity of certain parties to make use of standards as competency tools and in light of the on-going piloting of professional update, where we have expressed similar reservations, the EIS is minded to reject this proposal as it stands.

- 8.2 In Section 1 Introduction, the Standard for Career-Long Professional Learning makes it clear that the Standard for Registration "...continues to be the foundation of practice". This implies that SFR will continue to be the "gatekeeping" and "benchmarking" standard for Scotland's teachers. The Introduction then adds *"The Standard for Career-Long Professional Learning...provides a framework for teachers to engage in professional dialogue in order to consider and plan their ongoing (sic) professional learning and development."*

- 8.3 Section 2 then outlines that:

"The Standard for Career-Long Professional Learning describes the advanced professional knowledge and competencies that a registered teacher will develop and maintain as they continue to develop in teaching and the education profession throughout their careers."

It then argues that the Standard should be *"aspirational, challenging and demanding"*.

The *"aspirational"* aspect fails the tests of recognition and clarification of the expectations of Scotland's teachers with regard to Career-Long Professional Learning. Accordingly, since it is clearly not a Standard *per se*, the document should be retitled "Framework for Career-Long Professional Learning" and not published as a Standard.

- 8.4 The EIS strongly supports developments which improve CPD provision for teachers and teacher access to CPD. It is one of the greatest concerns of the EIS that the positive developments in relation to CPD for teachers in Scotland over the last 10 years are now being undermined by governments at both national and local level. The removal of “ring-fenced funding” in Scotland and the “austerity programme” promulgated by the Coalition Government in Westminster has resulted in major and damaging cuts to core education funding. Cognisance of this context is required.
- 8.5 In its response to the Donaldson Review, the EIS made clear that high quality CPD required sufficient resources. The EIS has concerns regarding the capacity of local authorities to fulfil their role in the Career-Long Professional Learning process. Teachers throughout Scotland have raised their concerns through the EIS that CPD funding is perceived as a “soft target” for spending cuts by local authorities. If this spending pattern and resource allocation continues, any positive developments to promote Career-Long Professional Learning in the longer term will be undermined.
- 8.6 The Standards for Leadership and Management make it quite clear that they supersede the Standard for Headship, (Scottish Executive, 2005) although the latter was not a GTCS required Standard. The Standard for Career-Long Professional Learning does not appear to make the same unequivocal statement regarding the future of the current Standard for Chartered Teacher. The GTCS is invited to consider this point and be explicit regarding its plans for the current Standard for Chartered Teacher.
- 8.7 The EIS takes this opportunity to repeat the arguments that any proposals for the incorporation of accreditation of prior learning and Masters-level credit into CPD will be a positive development, if appropriately funded and supported. In addition, CPD for Scotland’s teachers should not be restricted only to Masters-level studies. The EIS would oppose any move which required Scotland’s teachers to undertake, on a compulsory basis, additional qualifications, research, or study at Masters-level.

Q9 Would five years after gaining the Standard for Full Registration be an appropriate time for teachers to consider their development against the Standard for Career-Long Professional Learning?*

NO

Comments:

- 9.1 The appropriateness of any cycle should be monitored and reviewed as the programme of Career-Long Professional Learning develops. Any review must include the requirement for the GTCS to seek feedback and comment from those directly involved in process and their representative organisations.

- 9.2 The success of the development of Career-Long Professional Learning for Scotland's teachers will be contingent on the context in which they are working. The EIS has voiced concerns that the current economic context has reduced, and will continue to limit, the opportunities for quality CPD for teachers.

The Standards for Leadership and Management

The Standards for Leadership and Management incorporates the Standard for Middle Leadership and the Standard for Headship.

Q10 How helpful is the introduction of a Standard for Middle Leadership?*

Clear

Comments:

- 10.1 Although the introduction of a Standard for Middle Leadership is clear, for the reasons outlined in 8.1 to 8.3 above, the EIS has major difficulty in interpreting the Standards for Leadership and Management as a "Standard" and concludes that the document should be retitled "Framework for Leadership and Management". For these reasons, The Standards for Leadership and Management should not supersede the advice within the Standard for Headship, (Scottish Executive, 2005).

Alternatively, further consideration should be given to revising the proposed standard so that it specifically relates to those in formal leadership positions, i.e. promoted posts, which is where the body of its content already appears to sit.

- 10.2 The EIS notes that the GTCS proposes that the Standards for Leadership and Management should supersede the Standard for Headship, (Scottish Executive, 2005). Yet one of the purposes of these Revised Professional Standards (in 1.2 Purposes) is:

"The design of programmes leading to the attainment of the professional award and / or academic qualification leading to the Standard for Headship"

These two statements appear to be in conflict. The GTCS is invited to consider this point.

Q11 How effectively do these standards articulate the progression from Middle Leadership to Headship and beyond?

Comments:

- 11.1 The EIS agrees that "*Leadership is central to educational quality*" and recognises that many teachers possess leadership qualities that enable them to take the initiative in driving forward innovative teaching and learning. In modern school life, leadership is not just about a teacher's level of promotion and fulfilling management tasks. While the EIS fully recognises and acknowledges the roles and responsibilities of school management teams, it is equally sure of the importance of leadership at all levels within the teaching profession.

- 11.2 As indicated earlier, the development of collegiate working practices in schools varies across Scotland and within local authorities. It is disappointing to find that no reference is made to collegiality within 'The Professional Standard' for Leadership and Management. It is not to be found in the Standard for Middle Managers either. This should not be the case since collegiate working practices are designed to utilise the many diverse skills of the entire teaching profession. It is important that effective leadership is recognised and encouraged at all levels. This recognition and encouragement will result in all of Scotland's teachers taking pride in their ability to lead on important issues such as curricular change. This will bring real tangible benefits to Scotland's education system and for Scotland's pupils.
- 11.3 It is a matter of concern for the EIS that the Standards for Leadership and Management appear to be overly hierarchical. Although distributive leadership can be exploited, there is insufficient scope for the development of collegiate working practices and decision-making.
- 11.4 The EIS would view the list of professional actions in a different way if they were part of a general Framework. As a Standard for Leadership, these are not appropriate. The EIS also has concerns about the inclusion within the list of professional actions some proposed requirements which are more appropriately placed with the job description of a promoted post. It is not GTCS's role to determine the duties of teachers at any level; such guidance comes from the SNCT.
- 11.5 Within some of the content of 'Purposes' and 'Professional Knowledge and Understanding' within Leadership and Management there are found expectations and actions which seem vague, incomplete and potentially not for the GTCS to determine. We recommend that the GTCS revisit these sections.

Q12 These standards have been developed to support the professional learning of teachers. How suitable are they in supporting the development of educational professionals more widely, for example in the area of Professional Update?*

Comments:

- 12.1 High quality student placements; positive and effective experiences for newly qualified teachers; and quality career-long CPD require appropriate levels of funding. Introducing changes into any system always presents challenges but the environment (financial pressures and existing demands on schools and teachers) within which these proposals are being discussed raises issues of funding, resources, capacity in schools and workload of teachers which have to be part of the discussions on implementation.

Handling your response

The GTC Scotland will collate all consultation responses for our internal information. This allows us to properly consider the responses and weight views accordingly. However, we may be asked for copies of the responses to the consultation by other individuals and organisations. Therefore, we need to know how you wish your consultation response to be handled and, in particular, whether you are happy for your response to be made public.

If you ask for your response not to be made public we will regard it as confidential and treat it accordingly. All respondents should be aware that the General Teaching Council for Scotland is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

If you tell us that we can make your response public we will not do so unless specifically asked by external parties.

Please tick here if you do not want your consultation response to be made public. ☐