

**Consultation on GTCS-revised Registration Rules**

**Wednesday 5 January 2022**

1. The NASUWT welcomes the opportunity to comment on the GTCS-revised Registration Rules.
2. The NASUWT is fully supportive of GTC Scotland as the independent professional and regulatory body for teachers in Scotland. The Union also acknowledges GTC Scotland's important role in giving the teaching profession itself responsibility for its own standards.
3. The NASUWT wholeheartedly endorses GTC Scotland in strongly opposing any proposal which could erode or dilute the integrity of the Register of Teachers through changes to qualification requirements or similar.
4. The Union is comfortable with the broad aims of the revised Rules to:
  - provide a simplified registration framework that is easier to understand and has a clear evidence-based rationale;
  - ensure that the categories and status of registration reflect the current needs of the education system;
  - ensure that registration with GTC Scotland aligns with GTC Scotland's mission, aims and values; and

- widen the means by which GTC Scotland enables and encourages registrants to continue to grow as professionals through a revised 'Additional Registration' framework (replacing the current 'Professional Registration' route) and new 'Accredited Specialism' pathway.

**GTC Scotland proposes that the Register of Teachers will consist of the following categories of registration: primary education; secondary subject education; and further education.**

The NASUWT is content with this proposal.

**The proposed changes to registration categories meet GTC Scotland's aim to ensure that the Register of Teachers reflects the Scottish education system.**

Whilst the NASUWT is broadly supportive of this proposal, there are a couple of potential areas of concern – these are detailed in the answers to succeeding questions.

**GTC Scotland proposes 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 (P7); and**
- **literacy, numeracy and health and wellbeing across Broad General Education in other contexts in the interests of specific learners.**

The second bullet point opens up the possibility of primary teachers potentially taking lessons of S1, 2 and 3 pupils in the secondary sector. The reverse certainly happens at the moment as part of some P7/S1 transitional arrangements: where secondary teachers often go and teach a lesson to P7 pupils in the primary, or the P7 pupils visit the secondary as part of an early induction process. Primary colleagues formally being allowed to teach in the

secondary sector, particularly as part of any P7/S1 transition arrangement, should not cause any significant issues, but there would need to be appropriate safeguards in place to ensure that the use of primary teachers in this way does not impact on staffing levels in secondary schools.

**GTC Scotland proposes 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; and**
- **skills for learning, life and work, interdisciplinary learning and responsibilities for all as part of the secondary curriculum.**

Although the third bullet point here reflects key parts of the Curriculum for Excellence and may help to give more status to areas of the curriculum which might otherwise be neglected because of time pressures on teachers, there is the potential for this to become a significant workload driver and appropriate safeguards would need to be put in place to avoid this.

**GTC Scotland proposes 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; and**
- **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, all while being supervised by the provider of school education.**

The NASUWT is content with this proposal.

**The proposed change is to cease the existing category of additional support needs (ASN). Once on the Register of Teachers, GTC Scotland proposes to recognise a teacher's qualifications in ASN and other specialist areas through a process of registration enhancement.**

The NASUWT is content with this proposal. The broadening of recognition of specialisms is to be welcomed, though some reassurance may need to be offered to ASN specialists that this is not an attempt to dilute recognition of their achievements.

**GTC Scotland proposes that in order to protect the integrity of the Register of Teachers, the status of Provisional (Conditional) Registration should no longer be issued.**

The NASUWT is content with this proposal.

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

Whilst understanding the rationale for this proposal, the NASUWT is reluctant to fully endorse it without having access to more detail on 'the intention... to ensure that Professional Update itself accommodates and recognises different circumstances'.

**GTC Scotland proposes that there are two registration statuses for the primary education and secondary subject education categories of registration: Provisional Registration and Full Registration.**

The NASUWT is content with this proposal, though with the caveat expressed in response to the previous question.

**GTC Scotland proposes to broaden the scope of teaching qualifications that meet registration criteria in the category of further education.**

The NASUWT is content with this proposal.

**GTC Scotland proposes 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.**

The NASUWT is content with this proposal.

**GTC Scotland proposes 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.**

The NASUWT is content with this proposal.

**GTC Scotland proposes that there are two registration statuses for the further education category of registration: Interim Registration and Full Registration.**

The NASUWT is content with this proposal.

**To be registered on the Register of Teachers, GTC Scotland proposes 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.**

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

The NASUWT is content with these proposals.

**GTC Scotland proposes 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.**

While broadly content with this proposal, the NASUWT would prefer to see more details on the proposed Additional Registration Framework before fully endorsing this change.

**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.**

While broadly content with this proposal, the NASUWT would prefer to see more details on the proposed Accredited Specialism Framework before fully endorsing this change.

**GTC Scotland proposes 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.**

The NASUWT is content with this proposal.

**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; and**
  - 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, as well as any other changes or amendments required to their registration record; and**
- remaining a member of the PVG Scheme and provide updates to GTC Scotland as requested.**

The NASUWT is broadly content with these proposals; however, the treatment of the PVG Scheme as a national requirement (which is to be commended) should also see the end of the practice whereby teachers registered to teach with more than one employer (mainly supply teachers) are required to pay for a PVG process with each of those employers.

**GTC Scotland proposes that a registration review is no longer referred to the panel process. Instead, a formal internal review process will be followed as detailed in the Rules.**

Whilst understanding the rationale for this proposal, the NASUWT remains unconvinced by the move from a panel to an 'internal review process' and would prefer to see more details about this before endorsing such a change.

**GTC Scotland proposes 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.**

The NASUWT is content with this proposal as long as teachers are clearly informed about this and that their data is treated appropriately, in accordance with the General Data Protection Regulations (GDPR).

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