The General Teaching Council for Scotland

Accreditation process and requirements review consultation survey

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Contents

Questions

Section 1: GTC Scotland's role

Q1. If you have any comments about this section, please write them below.

In the Evaluation Framework and the Accreditation Policy previously there was an introductory section on Equal Opportunities: it is disappointing to see any reference to this having been removed from the introduction and pushed further into the document

The NASUWT has repeatedly stressed to the GTCS that more must be done than reference equalities; in this context removing the legislative foundations which mandate the GTCS to embed equalities makes this omission all the more jarring.

The GTCS is specifically referred to in Part 3 of Schedule 19 of the 2010 Equality Act, and is therefore subject to the Public Sector Equality Duty (PSED). Consequently, the GTCS must, inter alia, in the exercise of its functions, have due regard for the need to advance equality of opportunity between people who share a protected characteristic and those who do not. For example, applicants who have a protected characteristic and are considering entering the teaching profession should feel encouraged to do so and feel that the profession is welcoming of diversity, rather than simply meeting minimum statutory requirements.

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Section 2: this document

Q2. Do you think the proposed name of the draft policy accurately reflects its purpose and scope?

Yes   ☒
No   ☐
Don't know   ☐

Q3. If not, please explain why.

The name of the document is less important than its contents.

Q4. What resource(s) do you think would be helpful to have by way of additional guidance and support?

When NASUWT responded to the GTCS consultation on proposed changes to the Memorandum on Entry Requirements to Programmes of Initial Teacher Education in Scotland in 2024, our earlier response from 2018 was quoted -

> In our 2018 response, NASUWT noted:
> 'It would be helpful to have access to the data on the level of qualification of successful applicants over the last five years. Many providers note that due to the high number of applicants for their programmes, many of whom have academic qualifications significantly above the minimum, not all qualified applicants make it through.
> Indeed, the Transforming Scotland into a maths positive nation: final report of the Making Maths Count group report set out in recommendation 6:
> 'The GTCS, in partnership with Initial Teacher Education Institutions, Education Scotland and local authorities, should undertake research on how well ITE students are being prepared to teach maths as newly qualified teachers. The research should include a review of:
> • Minimum entry requirements to ITE for Maths.
> • Other means of ensuring applicants have good quality maths skills, e.g. online testing of applicants' numeracy skills.
> • The extent to which there is sufficient coverage of maths in primary ITE programmes to allow meaningful, quality maths learning in primary schools.
> • The means by which ITE institutions continuously update and improve their programmes and provide a practical focus on teaching and learning styles that instils teacher confidence in delivering maths.
> • The extent to which the probationary year promotes good quality teaching and learning styles and improving confidence in maths.'
> 5. **NASUWT continues to recommend that further research is undertaken and robust data gathered to support future reviews.**
> 6. Additionally, full consideration must be given to the impact any policy change will have on people who share a protected characteristic in order to demonstrate compliance with the equality duties. Some students may encounter difficulties in achieving the qualifications and, arguably, the focus of higher education institutions (HEIs) should be on the students' potential, which should involve some flexibility regarding qualifications, support for trainee teachers during their studies, and continuing professional development for fully qualified teachers throughout their career.

It is again disappointing having for some time called for robust data and research from the GTCS that this consultation is being undertaken with neither attached. The GTCS must agree a research strategy to inform and enhance any future reviews or consultations.

Section 3: general principles

Q5. Do you agree with the inclusion of an upfront statement of general principles?

Yes   ☒
No   ☐
Don't know   ☐

Q6. If not, please explain why.

Q7. Do you think that we have identified the right principles associated with the process?

Yes   ☐
No   ☐
Don't know   ☒

Q8. If not, please explain why.

Fundementally, the proposals are less about changing what good initial teacher education looks like and more about changing how it is regulated. The GTCS is seeking clearer powers to monitor programmes, intervene between accreditation cycles, and withdraw accreditation if standards it sets are not being maintained.

While some schools might welcome the promise of greater consistency and assurance, if concerns had been expressed about variability in how well-prepared student teachers are when they arrive on placement. Certainly, the proposals purport to place much stronger emphasis on placement quality, assessment moderation, and the professional accountability of those involved in judging student progress. The shift away from six-yearly 'snapshot' reviews towards ongoing monitoring could also mean that problems in programmes are picked up earlier rather than being left to drift.

However, it is very difficult to agree policy without a solid evidentiary base, as highlighted above. It is to be anticipated that many in the ITE sector in Scotland will push back quite strongly against claims that they do not prepare student teachers effectively on a consistent basis. No compelling evidence of an issue that needs to be addressed has been provided. If this is the solution, first the demonstrated problem must be set out. Then on that solid foundation we are in a better position to determine what the appropriate general principles should be.

Section 4: equality, diversity and inclusion

Q9. Is there anything else we should add to this section to reinforce the importance of promoting diverse and inclusive teaching qualification programmes?

The GTCS must seek to engage teachers and registrants from under-represented groups directly and give them a platform to inform policy. The voices of those under-represented groups must be amplified. The GTCS should set out how those views will be collated, what data will be sought from providers and it would be helpful to underline the shared aims e.g. increasing diversity within the teaching profession, including meeting the national 2030 target for 4% from minoritised communities.

Section 5: admission of individuals to programmes

Q10. If you have any comments about this section, please write them below.

Arguably the focus of higher education institutes (HEIs) should be on the student's potential, which should involve some flexibility regarding qualifications, support for trainee teachers during their studies, and continuing professional development (CPD) for fully qualified teachers throughout their career.

The ultimate responsibility for choosing students lies with the HEI and NASUWT would like to reiterate its view that there is not currently any difficulty in HEIs selecting excellent students. The guidelines should allow HEIs the freedom to use their skills and knowledge to select the best candidates for their courses.

Section 6: content, nature and duration of programmes

Q11. For programmes of TQFE, will this section of the draft policy work effectively in tandem with the Scottish Government's course and entry requirements?

Yes   ☐
No   ☐
Don't know   ☒

Q12. If not, please explain why.

The Union suggests that an early review is undertaken to assess impact.

Q13. Do you agree with the rationale for aligning the content and nature of teaching qualification programmes more explicitly with the Standard for Provisional Registration?

Yes   ☐
No   ☐
Don't know   ☒

Q14. If not, please explain why.

The proposals promise to deliver a clearer alignment between initial teacher education, professional standards and entry to the Register. In principle, that might strengthen the professional status of teaching and reinforce the idea that ITE is not just a university qualification but a regulated gateway into the profession.

However, there are some potential unintended consequence. Firstly, there is the potential impact on school–university partnerships. A more risk-based, compliance-driven system may encourage providers to become more cautious, more standardised and less willing to place students in complex or challenging settings. That could reduce opportunities for student teachers to learn how to work with the full diversity of children and communities that schools serve.

For teachers in service, particularly those supporting placements, there is a risk of increased administrative burden and tighter procedural control over professional judgement. The framework assumes capacity in schools to absorb enhanced monitoring and evidence-gathering: this is not realistic nor an assumption we could accept.

For teachers in training, the proposals would raise the stakes considerably. Assessment is framed very explicitly here as a regulatory judgement relied on for registration. This is very likely to increase anxiety and reduce the sense that ITE is a developmental and formative experience. While clearer expectations and moderation processes may improve fairness, there is also a danger that flexibility, second chances and support for non-linear professional development become harder to justify in a high-stakes regulatory environment. There is a risk here that many students who would otherwise go on to become effective professional practitioners will fall foul of such a regime.

There are also some potential implications for children. Stronger regulation may, in theory, help protect against 'weak' provision. However, if it leads to risk-aversion, narrower practice or less inclusive placements, children, especially those in more challenging contexts, could be the unintended losers.

Q15. Does the table set out in section 6.11 accurately reflect current requirements:
a) in general

b) specifically in relation to Professional Placement requirements?

Yes   ☒
No   ☐
Don't know   ☐

Q16. If not, please explain why.

Section 7: teacher educators and programme staffing

Q17. Will having clearer expectations with regard to the attributes required of a teacher educator help select good quality candidates to programmes of ITE?

Yes   ☐
No   ☐
Don't know   ☒

Q18. If not, please explain why.

Setting expectations without an enforcement mechanism means that impact will be limited: ultimately the GTCS does not employ teacher educators nor would failing to meet the expectations in and of itself impact GTCS registration.

Q19. Have we identified the correct attributes and skills required of a teacher educator?

Yes   ☐
No   ☒
Don't know   ☐

Q20. If not, please explain why.

The NASUWT Scotland Executive Council Policy Committee has expressed the clear view that teacher educators should maintain a level of classroom experience. Opportunities for facilitating ongoing classroom teaching in schools is not mentioned within the expectations.

Q21. Do you agree with the need to have appropriate induction and ongoing professional development arrangements for teacher educators in place?

Yes   ☒
No   ☐
Don't know   ☐

Q22. If not, please explain why.

Section 8: assessment of individuals undertaking teaching qualification programmes

Q23. Have we identified the necessary attributes for the effective assessment of student teachers?

Yes ☐
No ☒
Don't know ☐

Q24. If not, please explain why.

Attributes outlined are very broad. Exemplification might assist understanding of expectations in this area.

Q25. Are the new provisions on managing conduct issues framed appropriately if concerns about student teachers arise?

Yes ☐
No ☒
Don't know ☐

Q26. If not, please explain why.

Again these are very broad and lack any level of specificity.

Section 9: accreditation application, assessment and duration

Q27. Does the criteria set out in 9.4 correspond with the information required for your internal approval process(es)?

Yes ☐
No ☐
Don't know ☒

Q28. If not, please explain why.

Q29. Is there any further data that we should request or steps that we should carry out as part of our process?

Has a workload audit been undertaken for the GTCS to ensure the process will be manageable? With increasing numbers of courses, a pragmatic approach to data collection will be required. Feedback on accreditation documentation submitted would be a useful part of any process, to ensure moving forward the relevant information is shared without overburdening any parties involved.

Q30. If we were to bring in an independent assessor to help with accreditation determinations, do you have any views on who would be well placed to perform this function and what knowledge or expertise would be required?

Yes   ☐
No   ☐
Don't know   ☒

Q31. If yes, please explain why.

Q32. What are your views on accreditation operating as a cycle of activity with defined stages and deadlines? When could or should the accreditation cycle(s) take place in the year?

See response to Q8 and Q14 above.

Q33. What are your views on the possibility of paying a fee in order to have programmes of ITE or TQFE (re)accredited?

NASUWT concurs with the GTCS that it is not appropriate at this time.

Q34. Do you think it is appropriate for us to take action in instances of non-compliance with the accreditation process?

Yes   ☐
No   ☐
Don't know   ☒

Q35. If yes, what sort of action would you consider to be appropriate?

It is impossible to answer as no data has been provided on the extent to which the current accreditation process is adhered to. The Union would request that further and better data is provided upon which an informed position can be taken.

Section 10: accreditation regulation

Q36. Do you agree with our rationale for proposing the introduction of an ongoing monitoring and supervision function as part of the accreditation process?

Yes   ☐
No   ☐
Don't know   ☒

Q37. If not, please explain why.

See response to Q8 and Q14 above.

Q38. Do you have any views on what data we should request, or activities we should carry out, to inform an ongoing monitoring and supervision function?

The consultation documentation has not set out clearly the monitoring or supervisory function being undertaken to date. As per Q4 there are significant data gaps within the GTCS. It is not possible to respond in detail to this question without a more detailed analysis of the processes undertaken to date.

Q39. Do you think our proposed non-compliance supervision process will give HEIs sufficient opportunity to take action to meet the required accreditation standards and conditions in the event this situation arises?

Yes   ☐
No   ☐
Don't know   ☒

Q40. If not, please explain why.

Q41. Taking sections 9 and 10 together, do you think we have achieved our aim of creating a targeted, proportionate and risk-based approach to accreditation?

Yes   ☐
No   ☐

Don't know ☒

Q42. If not, please explain why.

NASUWT is supportive of a joined up, coordinated approach, but is cautious to endorse the proposed changes without having seen the evidentiary underpinnings.

Section 11: glossary and interpretation

Q43. Are there any words or terms that we have not included which could usefully be defined?

It would be helpful to have links to other relevant documentation either embedded throughout the document or contained at the end after the glossary.

Additional comments

Q44. If you have any comments about anything not covered by the consultation questions, or any other general observations, please write them below.

Respondent information form

Please note this form must be completed and returned with your response.

Are you responding as an individual, group or an organisation?

Individual   ☐
Group   ☐
Organisation   ☒

If responding as an individual or group, which of the following best describes your role in the education system?

Teacher / Lecturer / Practitioner	☒	Student / prospective teacher	☐
School / Centre Leader	☐	National Agency Officer	☐
Local Authority / Regional Officer	☐	Other (please state):	

If responding as an individual or group, which of the following best describes your sector?

Primary (local authority)	☐	Primary (independent sector)	☐
Secondary (local authority)	☐	Secondary (independent sector)	☐
Further / Higher Education	☐	Other (please state):	

Trade Union

We may want to contact you about some of the points you have raised in your response. If you are happy for us to do this, please provide your name and an email address.

Name: Mike Corbett

Email address: scotland@mail.nasuwt.org.uk

Responding to the consultation

You can email your completed survey response to gtcs@gtcs.org.uk and put 'Accreditation Process and Requirements Review consultation' in the email subject line.

You can also print off the document and post to:

General Teaching Council for Scotland
Clerwood House
96 Clermiston Road
Edinburgh
EH12 6UT

If you need us to provide the consultation documentation in an alternative format, please email us at gtcs@gtcs.org.uk.

Deadline for responses

All responses should be received no later than 5pm on Thursday 12 March 2026. Responses received after this deadline may not be considered. Please let us know in advance of this deadline if you anticipate having difficulties meeting it.