

# **Education (Scotland) Bill 2015: Business and Regulatory Impact Assessment**

**March 2015**

# Final Business and Regulatory Impact Assessment

## **Title of Proposal**

Education (Scotland) Bill 2015

## **Purpose and intended effect**

It is the aspiration of the Scottish Government that Scotland is the best place to grow up. The Education (Scotland) Bill will contribute to this aspiration by ensuring that children in Scotland have the opportunity to access the support they require in gaining the best possible education.

### **Background**

The Scottish Government is committing to ensuring that all of our children and young people are given the best possible opportunities. Through placing a greater emphasis on closing the attainment gap which continues to exist between children and young people from more and less disadvantaged backgrounds, children and young people will be given a better opportunity to improve their educational outcomes. It is vital that children and young people are able to use their voice in matters that affect their education. Specifically, we need systems in place to help children, with additional support needs, have the opportunity to affect decisions which are about their learning. We are also aware of the need to ensure parents are involved and have rights with regards to their child's education. A manifesto commitment was made to strengthen and expand Gaelic medium education (GME) in Scottish schools. We will use the Education Bill to achieve this, aiming to further progress the Scottish Government's support for GME and its commitment to recognising, respecting and promoting children's and parent's rights. The Education Bill will ensure that all teaching staff within independent and grant-aided schools are registered with the General Teaching Council for Scotland (GTCS). It is likely that only the provision to have a business or regulatory impact will be in relation to the GTCS registration of teachers in independent schools.

### **Objective**

- Through the Education Bill we intend to achieve the following objectives:
- Narrow the attainment gap between children and young people from more and less disadvantaged backgrounds. A duty will be placed on local authorities to have regard to the need to close the attainment gap when exercising their education functions. The aim is that local authorities should provide school education which is designed to reduce the inequalities of outcome which result from socio-economic disadvantage and to improve the attainment of the lowest performing children and young people. Local Authorities will be expected to work in partnership with schools, parents and other relevant bodies to deliver this change. Further to this the Scottish Government will have a new duty to promote equity of attainment and produce statutory guidance to assist local authorities in exercising their new responsibilities.

- Place a duty on local authorities both to assess the need for Gaelic medium primary education following a parental request and to actively promote and support Gaelic medium education and Gaelic learner education; the Bill will also place a duty on Bòrd na Gàidhlig to prepare guidance on how GME should operate in Scotland.
- Extend the rights currently enjoyed by young people (aged 16+) and parents under the additional support for learning Act 2004 (as amended to children from the age of 12, who have capacity to exercise those rights, if they wish to. This will enable children, who are able to, to influence decisions about the identification, planning and review of their needs.
- Enhance the process of consideration of complaints made to Ministers under Section 70 of the Education (Scotland) Act 1980 (which allows Scottish Ministers to investigate whether a school or educational establishment has failed in its educational duties and to take action to address such failures). The introduction of statutory timescales is intended to speed up consideration while maintaining a robust process.
- Ensure that all local authorities appoint a Chief Education Officer who has appropriate qualifications and experience.
- Ensure all teaching staff within independent and grant aided schools are registered through the General Teaching Council Scotland in keeping with mainstream schools.

A small number of other policy issues have emerged that will require legislation and will therefore be included in the Bill. These will strengthen existing legislation that affects education. These will be:

- Section 53 of the Education (Scotland) Act 1980 which sets out the provision for school food in Scotland, including the arrangement for free school lunches will be restated. This has been amended various times since its enactment, most recently through the Children and Young People Act (2014). There is no intention to amend the existing policy, but to tidy and clarify the statutory record. This will benefit those who have to consider the provisions of section 53.
- Section 47 (3) of the Children and Young People (Scotland) Act 2014 will be amended to give effect that all children aged 2 and over who have, or have had a guardian appointed under section 7 of the Children (Scotland) Act 1995 should be provided with mandatory early learning and childcare and not just those who are “eligible” within the definition in section 71 (3) (f) of the 2014 Act. This will be amended as currently this section of the Children and Young People Act unintentionally excludes a small group of children from the early learning and childcare provisions.

### **Rationale for Government intervention**

The proposed Education Bill aligns closely with the National Performance Framework and 4 out of the Scottish Government’s 5 Strategic Objectives – Wealthier and Fairer, Smarter, Healthier and Safer and Stronger. It also aligns

closely with a number of the National Outcomes, including:

- We are better educated, more skilled and more successful, renowned for our research and innovation;
- Our young people are successful learners, confident individuals, effective contributors and responsible citizens;
- Our children have the best start in life and are ready to succeed;
- We have tackled the significant inequalities in Scottish society;
- We have improved the life chances for children, young people and families at risk.

A legislative process is required to ensure that robust processes are in place to support children and young people in gaining the best possible education.

## **Consultation**

The Education (Scotland) Bill has been developed in a collaborative way, with extensive involvement from colleagues both across and out with the Scottish Government and from a wide range of interests.

### **Within Government**

Discussions have been on-going with colleagues across the Scottish Government to develop the Bill, including, but not restricted to, the following Divisions:

- DLEARN: Strategy and Performance
- DLEARN: Curriculum, Assessment and Gaelic
- DLEARN: People and Infrastructure
- DCAF: Policy Delivery
- DCAF: GIRFEC
- DCAF: Children's Rights
- CAJ: Looked after Children
- CRW: Better Life Chances
- CLLS: Access to Justice
- Education Scotland

### **Public Consultation**

On 26 November 2014, the First Minister announced the Scottish Government's intention to introduce an Education (Scotland) Bill to Parliament in 2015. Prior to this, public consultations were undertaken on the Gaelic, children's rights under additional support for learning and section 70 provisions in the Bill.

The 14 week consultation on children's rights under additional support for learning launched on 20 December 2013. A total of 59 responses were received from a broad range of stakeholder groups. Non-Confidential consultation responses were published on the Scottish Government website on 25 April 2014 and can be found at:

<http://www.scotland.gov.uk/Publications/2014/04/7613/0>

The formal analysis of the consultation responses was published on 30 May 2014:

<http://www.scotland.gov.uk/Publications/2014/05/2230>

The consultation on GME concluded in September 2014. 79 responses were received from a wide range of consultees.

The formal analysis of the consultation responses was published on 09 December 2014:

<http://www.scotland.gov.uk/Publications/2014/12/2395/downloads>

As well as the consultation exercise the Scottish Government held an equalities workshop for a wide range of stakeholders including, but not restricted to:

- Children in Scotland
- Scottish Children's Commissioner
- Inclusion Scotland
- Enable
- For Scotland's Disabled Children
- Engender
- LGBT Youth Scotland
- Stonewall Scotland

## **Business**

The Education (Scotland) Bill will primarily place duties on public bodies, for example Bòrd na Gàidhlig, Scottish Ministers, local authorities and agencies which are funded by the Scottish Government. The only Bill provision which may have an impact on business is in relation to the GTCS registration of teachers in independent schools. This may have a cost impact upon them, should they choose to support their current teaching staff to achieve the required qualifications / standards or change their employment practices. The number of teachers within the 100 independent schools who are not currently GTCS registered was 732 (18%), as of September 2013. It is anticipated that individuals would cover the cost of their own GTCS registration fees which is the current practice for teachers in the local authority sector. To discuss the potential impact of the Bill provisions, policy colleagues met with the Scottish Council of Independent Schools and the GTCS. Informal consultation was also held with COSLA.

Policy colleagues also selected a cross section of independent schools and discussed the financial impact of the proposal on the future operation of their schools. Further detail of the discussions held can be found in the 'Scottish Firms Impact Test' section.

## **Options**

The only provision in the Bill which is likely to impact upon business is with regards to the GTCS registration of teachers in independent schools. Set out below are options in relation to this.

## **Option 1 – Do Nothing**

The first option is to continue with the legislative situation as it currently is:

### **Current legislative position**

There is currently no requirement for teachers in independent schools or grant aided schools to be GTCS registered. The Requirement for Teachers (Scotland) Regulations 2005 requires local authorities to only employ GTCS registered teachers. The register of teachers that the GTCS has kept since they were established in 1966 for teachers in local authority schools has always been open to teachers in the independent schools sector and in the further education sector. Voluntary registration by teachers in the independent sector has always been encouraged with the GTCS and the Scottish Council of Independent School working together on this basis. Although it is not yet legislated for, all grant aided schools currently have a policy of only employing teachers who are registered.

### **Benefits of continuing with the current situation**

The primary benefits of continuing with the current legislative situation would relate largely to cost saving for individual teachers who would now, if the law is amended as proposed, have to pay for their own registration with the GTCS. In the short term the provision may involve costs for independent schools who choose to support their teaching staff to achieve the required standards for registration.

### **Costs of continuing with the current situation**

The costs of not implementing the new legislation to require GTCS registration for all teaching staff within independent and grant aided schools can be identified with later costs to society and the wider economy resulting from the potential for lower quality teaching and learning in independent schools.

## **Option 2 – Introduce the provision to ensure that all teaching staff in independent and grant aided schools are GTCS registered.**

A full explanation of all Education (Scotland) Bill provisions, including the provision to require that all teaching staff in Independent and grant aided schools are GTCS registered, can be found in the Policy Memorandum and the Explanatory Notes which are published alongside this document.

### **Benefits of introducing the provision to ensure that all teaching staff in independent and grant aided schools are GTCS registered.**

Compulsory GTCS registration will offer assurance to parents that irrespective of where their children are educated the standards and quality of the teaching staff is regulated by the GTCS. In addition there will also be benefits to teachers through the Professional Update which has been introduced to ensure that teachers are not 'registered for life' as the process required re-affirmation by the GTCS every five years that a teacher has kept their professional skills and knowledge up to date. The aim of which is to support, maintain and enhance teachers' continued professionalism through professional learning. The requirement will also provide

schools with assurances of the standard and quality of the teachers which they employ.

### **Costs of introducing the Provision to ensure that all teaching staff in independent and grant aided schools are GTCS registered.**

The costs of introducing this legislation will primarily fall upon individual teachers. The total cost of registering with GTCS as a teacher qualified in Scotland is currently £124. This reduces to £83 if the teacher is already a member of the PVG scheme as only a short scheme check will be required. There could be some financial impact on independent schools in respect of releasing staff for training and/or supporting their staff to reach the required standard for GTCS registration however, this would be on a school by school basis.

### **Sectors or groups affected**

The main sectors and groups affected by the legislative provisions in the Education (Scotland) Bill are likely to be:

#### **Private Sector**

- Independent schools

### **Scottish Firms Impact Test**

Throughout the policy development process policy colleagues met directly with a cross section of private sector businesses that will be affected by the provisions in the Education (Scotland) Bill.

The implementation of the provision within the Bill which relates to the GTCS registration of all teaching staff in Independent may have cost implications for these schools. An initial meeting has been held with the GTCS to gain an understanding of the cost implications for the GTCS and schools in the independent sector. A cross section of schools have been selected and a discussion has taken place with each as to how they see the proposal affecting the financial operation of their schools. The table attached at annex A provides an account of the discussions with the schools. Although the responses highlight some specific groups of teachers currently out with the scope of GTCS registration the intention is that through further discussions with the GTCS and the sector these can be overcome.

### **Competition Assessment**

The provisions in the Education (Scotland) Bill relate to services for children in schools. It is expected that it is unlikely that there will be any impact on competition within the current market.

### **Test run of business forms**

No new business forms will be brought in with the implementation of the proposed legislation.

## **Legal Aid Impact Test**

It is not expected that there will be any greater demand placed on the legal aid system by the commencement of any of the provisions within the Education (Scotland) Bill.

With regards to the extension of rights to children aged 12-15 with additional support needs, the number of current grants for the Additional Support Needs Tribunal for Scotland (ASNT) is modest and the Bill should not impact upon this. The Bill will not impact upon those who are eligible for assistance in relation to access to support for the ASNT.

In relation to section 70, decisions by local authorities or by Scottish Ministers currently can be judicially reviewed. There have not been a significant number of challenges to date.

## **Enforcement, sanctions and monitoring**

### **Enforcement**

The requirement to only employ GTCS registered teachers in independent schools slots into the system for registration and regulation set out in Part V of the Education (Scotland) Act 1980.

### **Sanctions for Non-compliance**

Where a teacher in an independent school is not registered with the GTCS then the legislation provides for an application to register a school to be refused, the disqualification of a teacher, a condition to be imposed on the continued registration of a school, a notice of complaint and the removal of a school from the register.

### **Monitoring**

This will be achieved through the annual collection of data relating to teachers in independent schools and through the process of school inspections carried out by Education Scotland.

## **Implementation and delivery plan**

We are aware that there are 732 (as of September 2013) non-GTC registered teachers in the sector. It is anticipated that around 240 of those teachers may find it more difficult to meet the GTCS criteria. Detailed discussions with the independent and grant aided schools sector as to the specific criteria and the timescales for introduction will take place; this will allow for transitional arrangements in respect of teachers who are currently working in independent and grant aided schools to achieve the required standard to obtain GTCS registration.

- **Post-implementation review**

It is anticipated that reviews will take place and legislation will be amended should the need arise.



## Summary and recommendation

In summary, the introduction of the Education (Scotland) Bill will support the Scottish Government's aspiration 'that Scotland is the best place to grow up.' We only expect there to be a business and regulatory impact on non GTCS registered in independent schools and the impact on them is expected to be limited. It is therefore recommended that the Option 2 outlined above should be taken forward.

- **Summary costs and benefits table**

<b>Option</b>	<b>Benefits</b>	<b>Costs</b>
<b><u>Option 1</u></b> <b><u>Do Nothing</u></b>	This option would enable teachers in independent and grant aided schools to continue to register with GTCS on a voluntary basis.	There would be no cost implication for independent and grant aided schools as teachers who voluntarily register would continue to cover their own costs
<b><u>Option 2</u></b> <b><u>Implement the</u></b> <b><u>Education</u></b> <b><u>(Scotland) Bill</u></b>	Compulsory GTCS registration will offer assurance to parents that irrespective of where their children are educated the standards and quality of the teaching staff is regulated by the GTCS. In addition there will also be benefits to teachers through Professional Update, the aim of which is to support, maintain and enhance teachers' continued professionalism through professional learning. The requirement will also provide schools with assurances of the standard and quality of the teachers which they are employing.	The costs of introducing this legislation will primarily fall upon individual teachers. The total cost of registering with GTCS as a teacher qualified in Scotland is currently £124. This reduces to £83 if the teacher is already a member of the PVG scheme as only a short scheme check will be required.

**Declaration and publication**

I have read the Business and Regulatory Impact Assessment and I am satisfied that (a) it represents a fair and reasonable view of the expected costs, benefits and impact of the policy, and (b) that the benefits justify the costs. I am satisfied that business impact has been assessed with the support of businesses in Scotland.

**Signed:****Date: 09/02/2015****Minister's name – Ms Constance****Minister's title – Cabinet Secretary for Education and Lifelong Learning****Scottish Government Contact point: Hallé Brown – 0131 244 0565**

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<u>School</u>	<u>Description of School</u>	<u>Q1 What is your current policy with regard to employing GTCS teachers?</u>	<u>Q2 Will the proposal have a financial impact on the operation of your school?</u>	<u>Q3 Can you provide an indication of the level of impact?</u>	<u>Q4 Will the impact be reduced by a staged introduction?</u>
<b>Aspire Education</b>	Special residential school providing day and boarding education to both primary and secondary pupils. Pupil roll 25	Only employ GTCS registered teachers.			
<b>St Leonard's School, Fife</b>	Mainstream boarding school providing education for pupils age 5-18. Pupil roll 519	<p>Currently we expect teachers applying for employment by St Leonards to be GTCS registered or eligible for GTCS registration. There are a small number of exceptions (see answer to question 3).</p> <p>There are a number of currently employed teachers at St Leonards not registered nor are eligible for registration who have been employed for a number of years (see answer to question 3).</p> <p>In the past, 'Exceptional Admissions' was a way to gain GTCS registration. However in recent years, this seems to have been closed and it has been difficult, if not impossible, or is simply impracticable for such individuals to gain accreditation with GTCS under the current system.</p>	Yes – if the categories of teacher outlined in the responses to questions 1 and 3 are unable to be GTCS registered.	<p>For nearly all of our teachers, registration is not going to be an issue.</p> <p>However for some, there are a number of matters that will need to be addressed before the requirement for GTCS accreditation can be fully implemented. For St Leonards, these fit into four categories.</p> <p>One category of non-registered teachers are those who have not completed an accredited PGCE or PGDE or equivalent but who are well-qualified in other ways and have proved themselves to be highly competent teachers through the school's appraisal scheme and have been employed successfully at St Leonards for a number of years.</p> <p>A second, and related category, is those who have</p>	A staged introduction would be essential, coupled with a broadening of the range of experiences and qualifications which would enable GTCS registration. I would welcome a mechanism similar to the requirement for a suitable SSSC accredited qualification for boarding staff who are not GTCS or equivalent registered (and as inspected by the Care Inspectorate). They have a period of time to gain an SSSC accredited qualification which is completed while employed by the school. This would seem to be a suitable model for gaining a similar form of GTCS accreditation for the categories in my response to question 3, though it would have to take into account the part-time nature of some teachers involved, particularly those teaching very specialised subjects (eg IBDP Italian literature and language

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		<p>An equivalent route will need to be found to enable registration of such teachers when this becomes compulsory.</p>		<p>completed or who are completing the Independent PGCE from the University of Buckingham, and who are as yet unable to gain GTCS accreditation.</p> <p>A third category is those teachers (usually part-time and often working in some capacity at the University of St Andrews - an invaluable opportunity for crossover between sectors) who teach a number of specialised subjects which are not part of the normal Scottish curriculum. These are typically teachers of native literature and language (not English) to international students as part of the International Baccalaureate Diploma Programme (IBDP) or as a native speaking IGCSE – for example in Russian, German, Italian, French etc. Again, they are well-qualified individuals teaching often at a near-university level to international pupils who have joined St Leonards because of this provision. We have 30 nationalities on the school roll and being able to teach native languages at the highest standards is a key part of maintaining this diversity. Coupled with the IB, this places St Leonards in an</p>	<p>to native Italian pupils).</p>
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				<p>almost unique position in Scottish education.</p> <p>A fourth category are those teachers (again normally part-time) who are teaching other specialised subjects such as History of Art; classical Greek or another specialist IBDP subject for which there is a part time need (eg IBDP Economics). Again these teachers often have an association with the University of St Andrews.</p> <p>Future recruitment of teachers from England and other EU and non-EU countries may also be affected – for example, if St Leonards is unable to recruit teachers who have QTS status in England, but which has been gained by routes not recognised by GTCS.</p>	
<p><b>International School, Aberdeen</b></p>	<p>Mainstream day school providing education for pupils age 5-18. Pupil roll 531.</p>	<p>We certainly may and do employ GTCS registered teachers, however our hiring needs go well beyond teachers who are GTCS registered.</p>	<p>I think it will have a very detrimental impact and could harm or eliminate our school in the future. This in turn could have an adverse effect on the oil and gas companies from which our families come to us. We are here in Aberdeen as an international school primarily to serve the needs of the oil and gas</p>	<p>I've started to address this above. The impact would be devastating to the excellent international programme we have established here in Aberdeen. I should also point out that we go through a strict accreditation process. We are accredited by both the Council of International Schools and the Middle States Association of Colleges and Schools. This involves site visits by</p>	<p>No. Not for us. As an international school with over 40 nationalities and teaching in a curriculum which leads to the IB Diploma, we need teachers with various backgrounds, from a variety of places around the world, that are familiar with this type of curriculum.</p>

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			<p>industry. Our type of education is generally desired by expatriate families who will then move back to their home country or move on to another overseas assignment. We do have some local students that for various reasons believe our system better meets their needs. Perhaps they are just back from an overseas assignment for example. We hire teachers to deliver our international curriculum which leads to the International Baccalaureate Diploma Programme in our final two years. Our teachers have teaching certificates but come from many different countries with many different backgrounds. We sometimes hire from a teacher's home country and other times our teachers are coming from another international school. We hire about 60% of our teachers locally and 40% of our teachers are hired from overseas. However, the majority of</p>	<p>accreditation teams and self-study reports. Our teachers are very involved in professional development. They take advantage of professional development opportunities locally, in the UK, internally, at various international schools, at various international conferences, and on line. This professional development is generally to focus on areas of school focus but can also be for meeting recertification needs in their home country, to earn an advanced degree, specific learning to the IB, etc. Our teachers are exceptionally involved in professional development for our programme.</p> <p>Also, recruiting for excellent international school teachers is extremely competitive. Having to recruit internationally with a future need of an overseas teacher needing to meet requirements to be GTCS registered would make recruitment very difficult against other schools in other countries.</p>	
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			<p>our locally hired teachers are not from Aberdeen. They are often in Aberdeen with a spouse in the oil and gas industry and wish to continue working as a teacher. They have often worked in another international school or in a similar curriculum to our school. Regardless, they need to fit our needs for delivering our curriculum. Their background and training is specific to our programme. If we were to have to hire only GTCS registered teachers it would be impossible to fill all the positions needed to deliver our unique curriculum.</p>		
<p><b>Kibble Education and Care Centre, Paisley</b></p>	<p>Residential special school including a secure service. Primary and secondary education. Pupil roll 85.</p>	<p>Most of our teaching staff are registered with the GTC – either because they already had a PGCE qualification or were put through the TQFE by Kibble ‘on the job’ so to speak.</p> <p>We have a few Staff presently not registered with GTC. They are either going to take the TQFE qualification or may be</p>	<p>Not if the plan as outlined above continues to operate</p>	<p>N/A</p>	<p>All our plans as outlined above are staged</p>

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		<p>retiring soon.</p> <p>However, with the Wood Report on 'Developing Scotland's Young Workforce', we have and are likely to employ more staff in our 'KibbleWorks' to develop employability skills and offer vocational qualifications to some Senior Phase students. KibbleWorks exists mostly for post school trainees and beyond – up to age of 25. All such staff will be Assessor qualified, but not GTC registered. Nonetheless, our Senior Phase school pupils will have access to KibbleWorks as a valuable part of their employability education.</p>			
<p><b>Strathallan School, Perthshire</b></p>	<p>Mainstream boarding school providing education for pupils 5-18. Pupil roll 560.</p>	<p>We normally expect our teachers to be registered with GTCS if this is possible. We do, however, have a number of teachers who are not currently eligible for registration some who were employed at a time when we thought that unqualified teachers would be able to be registered and some who have been employed subsequent to the change in policy. I think that currently we only have one teacher who has a qualification which the GTCS is not recognising.</p>	<p>The proposal would certainly have a financial impact on the operation of the School if the current requirements for registration were to be maintained. Obviously if the flexibility which was in operation between (if memory serves) c2000-2005 were to operate there would unlikely to be any impact. Obviously a lot would depend on which qualifications GTCS would accept were they</p>	<p>The cost of a one year PGCE at the University of Buckingham which has been designed for independent schools in conjunction with HMC is £3,995. We currently have seven members of staff who are not qualified so there could be a considerable impact. We also have sports coaches who work specifically in that context who are not qualified teachers. I would be interested to know whether there would be a requirement for these to be registered teachers. This would</p>	<p>Whether or not staged introduction would have an effect would obviously depend on the way in which such a move might be staged. Ultimately if we need to get everyone qualified it is likely that it would be preferable to get it done straightaway. It would certainly be helpful if prior experience were taken into account. If this were to mitigate the requirements then obviously it might easier in terms of cost by staging it.</p>



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		The others do not have a formal qualification.	to insist on qualifications.	obviously have a further impact.	
<b>High School of Glasgow</b>	Mainstream day school providing primary and secondary education. Pupil roll 1100.	Policy is to employ GTCS registered teachers and do not believe the proposed change will impact on the financial operation of the school.			
<b>Closeburn House School and Maben House School, Dumfries</b>	Both schools are special residential. Maben provides primary and secondary. Pupil roll 4. Closeburn provides secondary education only. Pupil roll 11.	<p>We require all of our teachers to have a teaching qualification but they do not have to be GTCS registered. We encourage all of our teachers to apply for GTCS registration. However, quite a few teachers have encountered difficulties which are not easy to resolve if they are to continue working in this sector.</p> <ul style="list-style-type: none"> <li>We recruit some very good teachers from the Further Education sector as they often offer subjects which are particularly suitable to our young people e.g. Hairdressing, Key Skills, and Catering. They are also very good at preparing our young people to enter FE as a positive destination and have helped to create some excellent links with local colleges on both sides of the border.</li> <li>We have a close relationship with the ITT</li> </ul>	Possibly	<p>This will depend on how the legislation is implemented. If the 3 teachers who are not eligible for registration under current regulations have to either work for 180 hours in a mainstream school, or gain a post graduate ASN qualification, this will have a considerable financial impact. We are a small school and would not have the staff numbers to cover for teachers having to work part of the week in another school for a year.</p> <p>It would also be very expensive to fund a compulsory post graduate ASN course, which some teachers may find too difficult to incorporate into a very busy schedule, where they are already planning for a number of different subjects. There is the possibility that some teachers may resign if the route to gaining GTCS registration becomes too</p>	<p>I feel that a staged introduction will allow us to prepare policies for current staff and look at future recruitment plans. It is essential that teachers who have been with us for many years can feel secure about their future employment, so a staged introduction must assess their needs in a sympathetic and realistic way. I think this may be a good time to rethink the registration process for the many independent schools who specialize in teaching young people with social, emotional and behavioral problems. We offer very comprehensive training to our teachers in all aspects of behavior management and they are all highly motivated professionals who regularly undertake CPD with CELCIS, ETCS, The Autistic Society, ASDAN, Strathclyde University, and Education Scotland, as well as engaging with the full range of</p>

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		<p>department at Carlisle College, which is just over the border, and have offered teaching placements to quite a few of their students. However, because their PGCE is post compulsory, we are currently unable to offer these students an NQT year that fulfils requirements for full GTCS registration. To gain any GTCS registration at all, they have to gain temporary registration as FE lecturers but can only gain full registration if they work a compulsory number of hours in the FE sector. They are not eligible to gain full registration as secondary teachers, even after working with the Scottish curriculum for a number of years, as our pupil numbers are too small. It seems that the only route to full registration is to take an ASN post graduate course on top of their PGCE.</p> <ul style="list-style-type: none"> <li>• We recruit teachers from England who have mainly taught in small schools for young people with SEBD and may not hold a current subject specialism.</li> <li>• We have recruited both primary and secondary NQTs from both Scotland and England. We have been advised that we cannot offer</li> </ul>		<p>difficult and they have no choice if they wish to remain teachers in Scotland. They are mature teachers, in their fifties, who are doing an outstanding job, and they are very apprehensive about the future. This will have a major impact on a small school like ours, particularly in a sector where recruitment is not always easy. If we are unable to recruit and train NQTs, particularly mature NQTs from the FE sector, we will lose an invaluable resource. Although there are some financial implications to being unable to recruit NQTs, the main implication is the impact this may have on the unique quality of our teaching staff.</p> <p>If sessional teachers for subjects like woodwork, hairdressing or music have to be registered we may no longer be able to afford them.</p>	<p>Curriculum for Excellence. Although the number of pupils is small, most teachers will teach all levels of Curriculum for Excellence over a range of subject areas, due to the particular needs of our young people and children.</p> <p>I would like to suggest that we look at a sector specific registration which meets a mutually agreed set of standards. This could be applied retrospectively to teachers who can be shown to have met those standards over an agreed period of time, and eventually used as the basis for an induction year for NQTs who make the decision to teach in this sector only. There would be the understanding that teachers would need to do further training if they wanted to move to mainstream teaching.</p> <p>A sector specific registration could also enhance the professional standing of teachers who often feel that they are excluded from mainstream initiatives, and allow for the development of further research and training in this sector as part of professional update.</p> <p>This may also be time to look at how schools like ours are categorized by Education</p>
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		<p>an NQT year that leads to full GTCS registration as our numbers are too small. The secondary school can take up to 15 pupils. The primary school can take up to 8 pupils. However, numbers vary each year.</p> <ul style="list-style-type: none"> <li>• We recruit specialists who are qualified to teach certain sports e.g. swimming, judo, but are not qualified teachers. We also recruit specialists in woodwork, craft and music etc. on a sessional basis.</li> <li>• We currently have 5 teachers who are GTCS registered</li> <li>• We currently have 3 teachers who are all qualified teachers, but do not have GTCS registration and have found that they are not eligible. 2 of these teachers have post compulsory PGCE.</li> <li>• We have one sports specialist who is not a qualified teacher and only teaches P.E</li> <li>• We have the same professional update policies for all teachers and those who are not registered are given the option of using the GTCS portal for a small fee.</li> </ul>			<p>Scotland and GTCS. The independent school categorization has meant that our young people have had to wait much longer than mainstream students for resources like GLOW, even though they are some of the most vulnerable young people in the country. If we are classified by sector, then hopefully we can be at the forefront for all future initiatives that have a positive impact on the education of our young people.</p>
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