

THE EDUCATIONAL INSTITUTE OF SCOTLAND

EIS Response to Consultation on draft Head Teacher and Training Standards (Scotland) Regulations

Consultation Questions

There is no obligation to respond to all questions and you are free to submit further comments as you wish. The questions are to help guide respondents.

Question 1

Do you agree with the scope and exemptions of the Regulations?

For the most part, yes. However, the EIS would question why headteachers in the independent sector are exempt from the regulations while teachers within independent schools will be required to demonstrate that they have met the GTCS standard for registration in the relatively near future. There seems to be a contradiction here.

Question 2

Do the exemptions allow for appropriate flexibility in relation to the staffing of schools?

Yes.

Question 3

Is the 24 month maximum limit for the duration of temporary appointments to the role of Head Teacher (where a person does not have the Standard for Headship) an appropriate limit and does it allow education authorities and grant aided schools sufficient flexibility?

Yes.

Question 4

Is the coming into force date of 1 August 2019 reasonable both for employers and aspirant Head Teachers?

The EIS would suggest, given the uncertainty in terms of the outcomes of the Governance Review of Education, and in the context of the current headteacher recruitment issues and general teacher shortage, that this deadline be extended to at least August 2020.

Question 5

Are there any other comments you would like to add regarding this consultation?

The EIS view is that the availability of this headship qualifications will not, in itself, incentivise people to seek to become headteachers.

Our senior manager members highlight the workload of headteachers and deputies as a significant issue, particularly in the context of teacher shortage. Many headteachers and deputies, in the absence of supply teachers, are teaching classes during what would otherwise be time set aside for management duties. They are clear that, in order for the learning associated with gaining the headship qualification to be overtaken, adequate protected time is required. Without this being available the likelihood of uptake of the course will be diminished and the drop-out rate high.

Within the context section of the document, there is no reference to the significant under-representation of women in headteacher posts within the Secondary sector. While there has been a gradually improving picture in recent years, still only 41% of Secondary headteachers are women yet they are 63% of the whole Secondary teacher workforce.

Similarly, there is no reference to the stark under-representation of Black and Minority Ethnic (BME) people within senior management posts, and specifically headteacher roles within the profession. BME teachers comprise 1% and 1.7% of the Primary and Secondary teacher workforce respectively, yet hold headteacher posts in such small numbers that they do not appear within Scottish Government school census data for either sector.

Such under-representation both of women and of BME people within headteacher posts and the underlying reasons for this, must be a matter for consideration in any analysis of the challenges around headteacher recruitment. The ADES report referenced in the context section makes no mention of this.

Also with regards to the context section of the document, the EIS would wish to highlight that many of our headteacher members are unhappy with the Scottish Government intention to confer more of the responsibility that currently sits with education authorities onto headteachers. To put it simply, the workload of headteachers can be increased no further. In light of this, the EIS would wish there to be further elaboration on what is meant by 'all the support necessary' on page 5. Finally, in terms of additional decision-making responsibilities, the EIS is disappointed that there is no explicit reference whatsoever within the consultation document to such decisions being taken at school level on a collegiate basis, involving teachers within the school or the learning community.