

# **University of the Highlands and Islands - Further Education Teaching Programme**

## **Consultation Analysis**

**August 2021**

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### About this report

This report provides an analysis of responses to the Scottish Government's consultation on "University of the Highlands and Islands - Further Education Teaching Programme" which ran from 18 May 2021 to 29 June 2021. The consultation paper can be accessed at [University of the Highlands and Islands - Further Education Teaching Programme](#).

## Background

Under article 30 of the Public Services Reform (General Teaching Council for Scotland) Order 2011, it is for the Scottish Ministers to determine what constitutes a recognised teaching qualification for individuals seeking registration as a further education teacher with the General Teaching Council for Scotland.

Before making or changing a determination under article 30, the Scottish Ministers must consult further education institutions or their representatives, the General Teaching Council for Scotland and such other persons appearing to them to have an interest. They must have regard to any views expressed by those consulted in relation to any determination. Determinations must be published.

The consultation sought views on a proposed further education teaching programme to be delivered by the University of the Highlands and Islands (UHI) in respect of which Scottish Ministers are proposing to make a determination in the context explained above. The consultation asked for feedback on the UHI programme with reference to:

- The programme admission arrangements.
- The content, nature and duration of the programme.
- The programme's assessment arrangements.
- The functions of the governing bodies, principals and members of staff of UHI providing the programme.
- Whether UHI is an appropriate programme provider.

### Overview of Respondents

A total of 14 written responses were received.

Of the 14 total responses, 13 have been published on the Scottish Government website. The respondent in the remaining response did not want their response to be published. All responses have been included in this analysis, irrespective of whether or not they have been published. The published responses can be accessed here:

[Published responses for University of the Highlands and Islands Further Education Teaching Programme - Scottish Government - Citizen Space \(consult.gov.scot\)](#)

Of the 14 total responses, 9 were received from organisations and 5 from individuals.

A full list of respondents can be found at Annex A.

## Overview of Responses

### **General**

- Respondents were generally supportive of the UHI programme proposed.
- The key areas of comment and concern related to admission arrangements for the programme (in particular scope of access and qualification requirements) and the content, nature and duration of the programme.

### **Programme Admission Arrangements**

- Some respondents were concerned that access to the programme is to be restricted to UHI staff.
- Some respondents were concerned regarding the level of qualifications required in subjects where an HND is not possible and about the consistency across providers in this context.

### **Content, nature and duration of the programme**

- A majority of the comments received related to the detail of the content, nature and duration of the programme.
- Some respondents were concerned that the duration of the programme (and start and end dates) need to offer more flexibility and better accommodate lecturers working part-time or fractional hours.
- A number of comments were provided on more detailed aspects of the course content and nature. The main theme raised in the comments provided is the need to enhance clarity through additional guidelines/explanation and ensure appropriateness of terminology.

### **Programme Assessment Arrangements**

- All respondents agreed that the programme assessment arrangements are suitable – one respondent suggested that a wider range of allowable formats should be considered.

### **Functions of the governing bodies, principals and members of staff**

- All respondents agreed that the functions of the governing bodies, principals and members of staff set out in the consultation were suitable.

### **UHI as programme provider**

- All respondents agreed that UHI is an appropriate programme provider.

## Analysis

There were 6 questions in the consultation document which related to the proposed further education teaching programme to be delivered by the University of the Highlands and Islands (UHI).

The following analysis follows the layout of the consultation document.

All questions which asked for a “yes” or “no” answer have been broken down into the following categories for responses:

- Yes – the respondent selected “yes” when answering the question
- No – the respondent selected “no” when answering the question
- No definitive answer (NDA) – the respondent did not select “yes” or “no” but provided comments which highlighted issues or made suggestions about the proposal
- Not answered (NA) – the respondent did not answer the question and made no comments about the proposal

## Admission

### Question 1

Do you consider that the Teaching Qualification Further Education (TQFE) programme as detailed in this consultation is suitable in relation to: admission?

13 respondents agreed that the admission arrangements detailed in the consultation are suitable whilst the remaining respondent did not answer the question:

Answer	Number	%
Yes	13	92.86
No		
No definitive answer		
Not answered	1	7.14

As part of responding to question 6 (further comments), respondents made the following comments about the admission arrangements set out in the consultation:

- It is unfair and runs contrary to the priorities set out in NJNC Circular 03/18 to restrict admission to the programme to UHI staff. Gaining a TQFE and registration with GTC Scotland within two years of the commencement of employment has become a contractual requirement for all lecturers, commencing employment on or after 1 April 2019. Data gathered by GTC Scotland indicates that 31% of lecturers working in Scotland's colleges do not have a TQFE. The programme therefore needs to be open to all lecturers. The capacity of the programme to scale up to meet demand should also be considered.
- It is inappropriate to restrict admission through application of 'nomination conditions' which seek to make the support of the employer a prerequisite for entry – this appears to involve UHI to an unnecessary extent in the contractual relationship between a college and the lecturer.
- Employability (work-based learning, skills development, placements, experiential learning) On page 8 point 6 'satisfies the requirements of National Bargaining for career progression purposes' should read...."satisfies contractual obligation to gain appropriate teaching qualification, requirement to register with GTC Scotland."
- It is unnecessary to require additional qualifications to be completed in circumstances where the highest subject qualification available is the HNC. The three qualifications listed are all at SCQF level 9, which is the same level as the undergraduate TQFE. This additional condition is likely to act as an additional barrier to participation. If full account is to be taken of the widening access agenda, then account could more appropriately also be taken of relevant lecturing or industry experience. Other Universities offering the TQFE accept City & Guilds Licentiateship LCGI (Professional Recognition Award) Level 4 (SCQF level 8/9).
- Updated national guidance is required on entry requirements to TQFE to ensure clarity and consistency between providers. Such requirements should take into account that TQFE is an important widening access opportunity and that potential participants come with a wide variety of previous qualifications and experience that can indicate suitability for study at the level they have chosen. A particular area of concern is for those who progressed through an apprenticeship route leading to an SVQ3 qualification (SCQF level 6) but have since undertaken other learning at higher levels (though not HNC or HND specifically). These candidates would seem to be excluded from entry to this



new programme which may, in turn, cause disparities by subject area in who is qualified/not qualified.

## Question 2

Do you consider that the TQFE programme as detailed in this consultation is suitable in relation to: content, nature and duration?

13 respondents agreed that the content, nature and duration of the TQFE programme detailed in the programme is suitable, the remaining respondent did not agree that it is suitable:

Answer	Number	%
Yes	13	92.86
No	1	7.14
No definitive answer		
Not answered		

As part of responding to question 6 (further comments), the following concerns about the content, nature and duration of the programme set out in the consultation were raised:

- The relevance of the sixth bullet point listed in the outcome section of the educational aims is questioned. This states that on successful completion of the programme, participants will have 'satisfied the requirements of National Bargaining for career progression purposes'. This is an apparent observation on contractual terms and does not accurately reflect the terms of National Bargaining Agreements as TQFE is only relevant for salary (not career) progression for lecturers who have been employed after 1st April 2019, with provision also being made that in certain circumstances where the lecturer has been unable to complete the TQFE within the required two year period, there will be no artificial barrier placed on pay progression. This reference to 'career progression' is erroneous and misleading.
- The start and end dates for the programme are scheduled to meet the provider's needs rather than the needs of lecturers in the college, especially in relation to part time staff. Some flexibility is required to reduce pressure on college resources and capacity to support remission times during a restricted September to May timeframe.

- Consideration should be given to the programme being offered over an extended period of time to accommodate staff who work part-time or limited fractional hours.
- The consultation document sets out the programme approach to Professional Learning and Development and refers to text in the programme handbook and then provides a programme overview. Reference is made in this context to 'curriculum and pedagogy'. Given the importance of terminology as part of self-reflection and professional identity, reference should be made to 'curriculum and andragogy' to reflect that Further Education relates predominantly to the teaching of adults.
- In terms of the structure of the programme, the consultation document states that the programme team is committed to a student-centred approach to learning and teaching, 'to support participants to move from lecturer-centred teaching to student-centred learning'. This statement presupposes that lecturers, who have not completed the TQFE, will not be engaging in student-centred approaches to teaching and learning. For many experienced lecturers, who have not had the opportunity to complete the TQFE through no fault of their own, this learning may be the validation of their existing good practice.
- In considering the detail outlined in the Programme's Teaching Themes, lesson planning is featured in week two of semester one. It is unclear from the consultation document as to whether the participants will be expected at that early stage to produce detailed lesson plans or sequences of plans, for inclusion in the digital portfolio which will form part of the assessment. Greater clarity in this respect would be welcomed.
- The focus on planning should be on its use as a tool for the lecturer, to aid them in their preparation of learning and teaching, and to support professional dialogue among colleagues. Planning and the associated documentation should be designed and handled with this key priority in mind, rather than as a bureaucratic practice which only adds to unnecessary workload demands or is regarded as an accountability tool.
- Reference is made in the themes for semester two to recorded 'micro lessons'. The consultation document does not explain what is involved in this process and under what circumstances recording of these lessons is to take place. There are a number of issues, not least of which is inclusive practice, arising from recording lessons.
- Given the centrality of the role of a mentor in facilitating self-reflection, professional dialogue and professional learning, the mentor should be identified through a process of collegiate dialogue, between the employer, the proposed

mentor and the lecturer involved. It should also be clarified that mentors will also be registered with GTC Scotland to support meaningful dialogue on the Standards, curriculum and andragogy.

- The consultation document provides that the programme will include two observations of learning. Reference is then made to 'classroom observations' in this context. Terms such as 'classroom observation' should be avoided recognising that learning takes place beyond the classroom setting in the FE context and a significant amount is now delivered online.
- What is considered during observations requires additional guidance to ensure consistency of application. GDPR issues regarding sharing of observation outcomes and feedback between the UHI observer and the mentor should also be addressed.
- The consultation document outlines the programme's learning and teaching approaches and indicates that they will be underpinned by 12 enhancement values. The first of these is 'learning for employment'. This would suggest that participation in this context goes beyond learning for employment and is directly related to teaching professionalism and the professional identity of college lecturers. This should be reflected clearly in the values underpinning the programme.
- The reference to opportunities for enhanced 'individual career prospects within tertiary education' on completion of the TQFE is unclear and detracts from the inherent educational value of the qualification and its links to professionalism, particularly given that all lecturers employed after 1st April 2019 will be required contractually to complete TQFE.
- There is a lack of course content referenced in the consultation document that explicitly addresses the entirety of Professional Standard 2.1 – namely the parts about '[understanding] the breadth of political, social and economic drivers influencing educational policy and strategy' and '[understanding] the political, social and economic profile of their communities and the potential impact of these on education and employment'. Attention to this is an extremely important aspect of preparing college lecturers to understand their ongoing role in an ever-changing sector.

### Question 3

Do you consider that the TQFE programme as detailed in this consultation is suitable in relation to: assessment of the programme?

All respondents agreed that the assessment arrangements are suitable:

Answer	Number	%
Yes	14	100
No		
No definitive answer		
Not answered		

As part of responding to question 6 (further comments), the following comment was noted about the admission arrangements set out in the consultation:

- The range of assessment tasks and the differentiation that will allow a distinction between those working at SCQF levels 9 and 11 is welcomed. However, the heavy focus on written formative and summative assessments could be very challenging for some participants – particularly those with only HNC level prior qualifications; the potential benefits of a wider range of allowable formats, such as audio reflections, professional dialogues or more visual presentation approaches should be considered. Using purely pass/fail criteria is potentially also a lost opportunity to reward outstanding academic work, particularly at SCQF level 11.

### Question 4

Do you consider that the TQFE programme as detailed in this consultation is suitable in relation to: the functions of the governing bodies, principals and members of staff of institutions providing those courses?

13 respondents agreed that the functions of the governing bodies, principals and members of staff detailed in the proposed UHI programme are suitable whilst the remaining respondent did not answer the question:

<b>Answer</b>	<b>Number</b>	<b>%</b>
Yes	13	92.86
No		
No definitive answer		
Not answered	1	7.14

#### Question 5

Do you consider UHI to be an appropriate provider of the TQFE programme described?

All respondents agreed that UHI is an appropriate provider of the TQFE programme described:

<b>Answer</b>	<b>Number</b>	<b>%</b>
Yes	14	100
No		
No definitive answer		
Not answered		

#### Question 6

Do you have any further comments that you consider to be relevant to the Scottish Ministers' determination?

5 respondents provided further comments. These comments have been attributed to the questions set out above where appropriate and where this was not appropriate, the comments have been set out below.

- There was a concern raised generally that the programme set out in the consultation provides no detail on a range of issues related to Gaelic and Gaelic Medium Education (GME) including:

- Language of delivery
- Any GME-related or Gaelic related module – or how this might be integrated into other modules
- Whether mentoring and staff development will be available through the medium of Gaelic
- When and how observation sessions, micro-lesson planning, portfolios and study groups might be delivered in Gaelic or English

It was recommended that the programme is reviewed and specific provision for both Gaelic and English delivery is identified and planned for and that appropriate planning is undertaken to publish details clearly, so that there is a wider understanding around the commitment in the programme to provide equal status for both English and Gaelic.

- Some respondents used this part of the document to highlight concerns they have about current TQFE provision and existing legislative frameworks surrounding TQFE. The main themes which were raised are:
  - The extent and consistency of TQFE provision, and fair access to it, across Scotland requires urgent consideration. Sufficient resources are required to ensure that college lecturers can obtain the TQFE, and in so doing, advance their professional recognition and quality educational provision.
  - The term TQFE does not reflect the broad scope role of colleges or staff, with many teaching staff delivering learning at SCQF levels 7 and above.
  - Consistency across TQFE providers generally is required, including on the aims and purpose of TQFE and credit transfer availability.
  - A roll on/roll off, flexible, work based model of holistic assessment, linked to national improvement priorities and Outcome Agreements, would be beneficial and worthy of some further scoping.
  - The legislative and policy landscape in the context of TQFE (with the introduction of mandatory GTC Scotland registration) makes the respective roles and responsibilities of Scottish Government and GTC Scotland unclear. GTC Scotland has a responsibility to determine registration criteria for who enters its Register; including whether someone may enter the Register who does not hold a recognised teaching qualification but we consider to have equivalent education, training or experience to warrant registration. GTC Scotland has also now been delegated responsibility by the Scottish Government to hold the Professional Standards for College Lecturers. Scottish Government has historically made assessments of what is equivalent to a TQFE. It is recommended that the Scottish Government provide GTC Scotland with

the powers to accredit and approve TQFE programmes and assess other programmes for equivalence in line with the transfer of the professional standards for college lecturers to GTC Scotland and the ambition to ensure every lecturer benefits from professional registration with GTC Scotland.

## Annex A- List of organisations that responded

- Dumfries and Galloway College
- Newbattle Abbey College
- University of Aberdeen, School of Education
- West College Scotland
- General Teaching Council of Scotland (GTCS)
- Dundee and Angus College
- The Educational Institute of Scotland (EIS)
- Bòrd na Gàidhlig
- Edinburgh College
- 5 individuals





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