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Dr Pauline Stephen  
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Dear Pauline,

Following your email of 26<sup>th</sup> June 2023, I am responding on behalf of The Open University in Scotland to your request for feedback and comments on the current The Memorandum on Entry Requirements to Programmes of Initial Teacher Education.

We note the following stated objective in the current GTCS Strategic plan to “Lead and support initiatives to improve diversity in teaching and tackle discrimination.”

We believe that the current *Memorandum on Entry Requirements to Programmes of Initial Teacher Education* does not sufficiently support this objective, and that the revision of the Memorandum presents an opportunity to address this. Specifically, we believe that the current memorandum, and its interpretation by ITE providers, inhibits widening access and constrains opportunity.

The existing Memorandum states that:

*“ITE providers should mitigate institutional barriers, and conscious and unconscious bias throughout the recruitment and selection procedures to ensure all applicants are given equal opportunity to be selected on to an ITE programme”*

The detail in Appendix B of the Memorandum, however, does not support the aspiration above and presents a very limited range of options for qualifications accepted as equivalent to the English (at SCQF level 6) and Mathematics (at SCQF Level 5) requirements, which we believe limits opportunities, particularly for mature learners.

This Appendix outlines a range of acceptable equivalent qualifications, which includes a limited range of options, including National Units, Higher Education Access Courses and “Equivalent qualifications from other countries”, but crucially does not include non-access University modular study such as that provided by The Open University, which would be at a higher SCQF level (7+) than the stated requirement. This is significant as most options presented would require mature students to attend a physical college or University campus to obtain these qualifications, often difficult or impractical for mature learners aiming to achieve entry requirements for ITE while maintaining employment and managing family commitments.

Providing more flexibility for meeting entry requirements to ITE can support people who are facing multiple barriers to entering the teaching profession.

Recommendation 8 from [Teaching in a diverse Scotland: increasing and retaining minority ethnic teachers](#) report states - “Universities providing ITE and the GTCS should examine national entry requirements, selection, admissions and interviewing practices to ensure that institutional barriers, conscious or unconscious bias do not deter applicants from being selected.” Acceptance of University modules studied on a flexible, distance learning basis would support work towards meeting this recommendation.

In [A Blueprint for Fairness](#), the final report of the Commission on Widening Access, recommendations 3, 4 and 5 discuss the need for joined up approaches to access programmes and their recognition by institutions across the country, with recommendation 5 particularly focussing on the need for universities to recognise the learning of people who “take advantage of the availability of a more flexible range of pathways” (page 4). There is a clear link here with our approach to providing an alternative, flexible pathway for attaining the English level 6 requirement for entering ITE.

As the leading provider of flexible, part time, degree programmes in Scotland the OU is uniquely positioned to assist learners aspiring to ITE to achieve the required entry standards. The average age of an OU Graduate is 28, and most (85%) remain in the location where their study is undertaken, which means their talent and skills benefit local communities.

We are aware of options such as The University of Aberdeen’s Access courses which are accepted by several ITE providers for applications for PGDE. However, these courses cost in the region of £400 to complete and provide 15 credits of study – meaning they are not eligible for the SAAS Part-Time Fee Grant (PTFG). Most modules offered by the OU are 30 credits or more meaning that they can be funded through the PTFG if the student is eligible for the grant. This is particularly relevant for groups such as Pupil Support Assistants, many of whom would qualify for PTFG, and we know may be interested in moving into a qualified teacher role.

At The Open University in Scotland we have found it difficult to engage with ITE providers to discuss how OU qualifications are and can be recognised through ITE admissions processes, and believe this may be due to lack of guidance as to how the Memorandum is to be interpreted by providers. Our experience is of inconsistent approaches across ITE providers to recognising study undertaken at The Open University and determining equivalency. For example, an OU level 1 module, MU123 – Discovering Mathematics, is accepted by the University of Aberdeen in place of an SCQF level 5 Maths qualification but this is the only provider with this qualification named on their website as an appropriate replacement.

**We would encourage GTCS and ITE providers to consider specifically including modular University study as “Qualifications Accepted as Equivalent to the English and Mathematics” in Appendix B, and to take a consistent and fair approach to operationalising the acceptance of University modules.**

We note your intention to undertake formal, targeted feedback with ITE providers following this period of informal engagement, as you work towards a review of the Memorandum in 2024. We look forward to hearing more about the outcome of this work and hope that widening participation and improving access for underrepresented groups is a prominent theme. We remain keen to engage with GTCS and ITE providers to support a more diverse range of applicants into the profession.

Yours sincerely,

Susan Stewart

**Director**

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