Response from the Scottish Council of Independent Schools to the proposed Government amendments to the Education (Scotland) Bill relating to the Standard for Headship

The Scottish Council of Independent Schools (SCIS) is an independent education charity representing over 70 independent member schools in Scotland which educate around 31,000 children of mixed abilities from diverse backgrounds. SCIS promotes choice, diversity and excellence in Scottish education.

In response to the Scottish Government's proposal to lodge an amendment to the Education (Scotland) Bill to introduce a requirement for prospective headteachers to hold the Standard for Headship (SfH) before appointment, the Scottish Council of Independent Schools wishes to raise a number of substantial concerns on behalf of members, who see no need or justification for the measure. No recent measure has caused as much genuine concern within the sector.

This response outlines our key concerns relating to the autonomy of independent schools, the impact on recruitment, the rationale behind the proposal and the relevance of the 'Into Headship' qualification. The paper goes on to outline the extensive leadership development and support already provided to headteachers in independent schools through Heads' membership associations which may not be widely known or understood, but which already ensures consistently high standards in headship.

**Autonomy**

Independent schools are, by definition and by statute, autonomous in their governance, curriculum and examinations. Making it a requirement for independent school headteachers in Scotland to have the 'Into Headship' qualification would impose a restriction on schools which are independent of the state sector, operating according to their own curriculum and funded entirely by fee paying parents. Independent schools accept and welcome the scrutiny of inspections carried out by Education Scotland and the Care Inspectorate, register care staff with SSSC, accept in principle the forthcoming legislation on the full registration of teachers with GTCS, and follow regulations governing Health and Safety, safeguarding and child protection.

However, the qualifications, experience and attributes of the Headteacher/Principal/Rector/Warden etc should remain strictly a matter for independent governing boards to determine. The majority of schools are charities and the governing board members act as charity trustees and company directors. An obligation and limitation on the recruitment of headteachers sits uneasily with the requirement for operational freedom from ministerial direction for charity trustees, as well as being a potential constraint on trade for company directors.

Unlike in local authority schools, it is the Governors’ role and responsibility to oversee the performance of the Headteacher. This performance review supports, but goes much wider than, the requirements of GTCS Professional Update for all GTCS registered teachers,
acknowledging the significant leadership responsibility and wide ranging remit of headteachers. It should not be the remit of The Scottish Government to restrict all headteachers in independent schools to the requirements of one specific qualification which has been designed around the context of headteachers in state-funded schools in Scottish local authorities.

Impact on Recruitment
Governors conduct rigorous recruitment searches, drawing applicants from across the UK and internationally, often with the assistance of sector-leading professional academic recruitment services. Governors seek to appoint the very best leaders, with the strongest attributes, skills and experience to take the school forward successfully as an educational establishment and limited company. The diversity of the sector caters for a wide range of pupil needs, including day and boarding mainstream schools, all-through schools, schools delivering an international curriculum with overseas pupils, a specialist music school, an MOD school, and Additional Support Needs schools, both day and residential.

Each school is unique and the appointment of the Head best suited to the individual context of the school and the pupils in their care is critical to the success of the school and the experience of pupils. The strength of the independent schools sector is diversity and autonomy and making the Into Headship qualification mandatory for headteachers would limit both. Any requirement for a prospective Head to be pre-qualified with a Scottish qualification will reduce the interest and availability of suitable talented applicants from outwith Scotland when vacancies are advertised, and curtail the power of Governing Boards to select the best, or possibly any, appropriate candidate.

The proposal would certainly be a barrier to recruitment from outside Scotland. Headteachers from outside Scotland are highly unlikely to gain the SfH speculatively. If a headteacher from England is already going through lengthy processes to gain GTCS registration as a starting point, only to be followed by processes for gaining the SfH, then this will undoubtedly deter highly competent and experienced candidates from applying. Schools offering boarding and working with different examination bodies to offer the International Baccalaureate, GCSEs, A Levels etc are likely to look to appoint a headteacher with knowledge and experience in these areas. Headteachers and Deputes in Scottish state schools are unlikely to have the background in these areas.

The proposal would also have a significant negative impact on smaller additional support needs schools where recruitment fields can be small and highly specific in professional terms. It is hard to envisage how this proposal might work across the special schools sector where schools are very diverse.

Rationale
On the whole, schools accept the principle behind the registration of all teachers in independent schools with GTCS and the safeguards that membership of a professional regulatory body brings. However, the justification behind the additional requirement for headteachers to have a single qualification is unclear. The benefits of this proposal to independent schools as quoted at the meeting between SCIS and The Scottish Government on 10.6.15 (equality across headteachers in Scotland, raising attainment, transferability of
headteachers between sectors) are hard to square with the context of the schools in question and the observed patterns of movement of headteachers. Over the last 2 years one third of headteachers appointed to mainstream independent schools (all through schools and prep schools) in Scotland have come from outside Scotland (6 out of 18 appointments). All of these 18 headteachers have moved from previous positions in independent schools.

It is hard to see what value the qualification would be to many new headteachers in SCIS schools who come from previous Headships often outside Scotland. Of the 6 headteachers appointed from outside Scotland in the last 2 years, the majority have come from previous Headships. Most other headteachers appointed in mainstream schools were previously in Deputy Head posts.

**Relevance of the Into Headship qualification**

The 'Into Headship' qualification has been designed specifically and explicitly by the Scottish College for Educational Leadership for headteachers working in the context of a local authority, and the support mechanisms around the programme are contingent on local authority networks and not designed for an individual working within an independent school. It is not clear that any impact assessment of the Into Headship proposals looked at independent schools. Whilst there are inevitably clear areas of overlap for individuals taking on leadership positions regardless of the sector, there are also distinct features where a different focus is more appropriate, as reflected in the programmes offered by membership associations (see below) which cover for instance marketing and finance models and curriculum policy in the different context of independent schools.

The leadership structures in independent schools are diverse and further undermine the logic behind imposing one qualification on the 'headteacher'. In large all-through mainstream schools the Principal/Headteacher will be supported by a strong leadership team with specific responsibilities for the Junior and Senior Schools. Within the senior leadership team there is often a Depute/Director of Studies with specific responsibility for leading Learning and Teaching and dealing with academic matters.

In smaller additional support needs schools senior managers have diverse roles to support both the care and educational provision of pupils, in some cases with an overall Chief Executive. Some schools such as Steiner schools are set up without a hierarchical management structure according to their ethos and founding principles.

**Leadership Development and Support for Aspiring and New Heads through Membership Associations**

The majority of mainstream independent schools and their Heads in Scotland are members of an independent schools' association in addition to their membership of SCIS, notably the Headmasters' and Headmistresses' Conference (HMC), Girls' Schools Association (GSA), Society of Heads, Independent Schools Association (ISA) and Independent Association of Prep Schools (IAPS). Many Heads are also members of School Leaders Scotland (SLS) or the Association of Headteachers and Deputies in Scotland (AHDS).
The membership associations listed above impose their own criteria and procedures for membership. For instance, when a school applies for membership of the Independent Association of Prep Schools, IAPS scrutinises the school's inspection report and the school's headteacher. The Head is expected to be suitably qualified and appropriately experienced. The Head's application must be supported by two professional references, preferably other IAPS Heads. Each new IAPS member must, as a requirement of membership, attend IAPS New Members' Induction and will be visited at least once by an IAPS trained mentor – regardless of whether they are new to Headship or an experienced Head, but new to IAPS.

HMC, GSA and the Society of Heads apply similar procedures and criteria of membership. In the case of HMC a full inspection of the school is also carried out prior to membership being approved.

Each association runs an in-depth induction programme for new headteachers. This is part of a suite of courses offered by each association taking staff from Aspiring Middle Leaders to Middle Leaders and onto Aspiring Heads and then support for Heads in post. This extensive provision and systematic approach is hugely beneficial in ensuring that the right people come through and are prepared for the demands of a Headship post.

The SCIS School Leadership programme is also a well-established and highly respected course tailor made for aspiring Heads and Deputes in independent schools, and takes 12 months to complete.

Overall, SCIS feels that these are substantial concerns and the process by which this amendment has been introduced has not allowed for sufficient discussion and consultation around the issues and implications of this proposal. Independent and grant-aided schools are currently working towards full registration of all teachers with GTCS in order to meet the requirements of the Education (Scotland) Bill Sections 21 and 22 within the required timeframe. This is a significant process entailing lengthy discussions with GTCS and development of appropriate procedures to enable all those who are currently ineligible for registration to secure routes to registration. For those teachers who will be required to undertake further training this will involve a significant commitment in terms of time and cost from the individuals and their schools, a cost not considered at the time the requirement was proposed. It would be unreasonable to expect schools, supported by SCIS, to meet the requirements of this additional amendment relating to the SfH for which the rationale is unclear and the potential negative impact significant.

Scottish Council of Independent Schools
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