1. Did you take part in any consultation exercise preceding the Bill and, if so, did you comment on the financial assumptions made?
No.

2. If applicable, do you believe your comments on the financial assumptions have been accurately reflected in the FM?
n/a

3. Did you have sufficient time to contribute to the consultation exercise?
n/a

Costs
4. If the Bill has any financial implications for your organisation, do you believe that they have been accurately reflected in the FM? If not, please provide details.
GTCS considers that the costs in the Financial Memorandum (FM) do not adequately reflect the full nature of the work that needs to be undertaken by GTCS to deliver on the registration of all teachers in independent schools and grant-aided special schools. In particular, the FM does not recognise the preparatory work that is required by GTCS to establish the framework for registration of these staff. Required costings are set out below.

**Required costings for meeting the requirements for mandatory registration in independent schools and grant-aided schools**

Scottish Council of Independent Schools (SCIS) and GTC Scotland Working Group. Eight meetings over the next two year at a cost of £500 per meeting (GTCS staff time and admin plus travel expenses) £4000

Working with the University of Buckingham, the Headmasters' and Headmistresses' Conference and SCIS to arrange accreditation of Buckingham Initial Teacher Education (ITE) programmes (GTCS staff time and admin) £2000

Working with other universities (currently Worcester, Cumbria and the University of the Highlands and Islands) to arrange accreditation of top-up PGDE programmes (GTCS staff time and admin) £3000

Developing and piloting Standards for Registration Equivalence Tests (currently University of Strathclyde). (GTCS staff time and admin plus travel expenses and fees to university) £3000
Working with universities to explore an Assessment Only Route to registration 
(GTCS staff time and admin plus travel expenses and fees to university) £2000

Provisional Conditional Registration: further exploration
(GTCS staff time and admin) £1000

£15000

The statement in para 27 of the FM that there is no additional cost on Scottish Government in supporting the registering of teachers or the administration of their professional update is accurate. These costs would be absorbed by GTCS through registration fees.

5. Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?
See above.

6. If applicable, are you content that your organisation can meet any financial costs that it might incur as a result of the Bill? If not, how do you think these costs should be met?
See above. GTCS suggests that Scottish Government makes a one-off payment to GTCS to cover the costs set out above.

7. Does the FM accurately reflect the margins of uncertainty associated with the Bill’s estimated costs and with the timescales over which they would be expected to arise?
The above costs in respect of Sections 21 and 22 would be one-off in order to establish the infrastructure that will allow those teachers currently ineligible to be registered. Any future costs, such as liaising and accrediting further university top-up courses, would be absorbed by GTCS.

Wider Issues

8. Do you believe that the FM reasonably captures any costs associated with the Bill? If not, which other costs might be incurred and by whom?
None in respect of the work of GTCS.

9. Do you believe that there may be future costs associated with the Bill, for example through subordinate legislation? If so, is it possible to quantify these costs?
None in respect of the work of GTCS.