



Teachers' Union of Ireland

Response to invitation by the Teaching Council regarding proposed teacher registration regulations.

(September 2024)

Introduction

The TUI would like to thank the Teaching Council for the opportunity to make this submission.

The TUI represents teachers, lecturers and staff (21,000+) in Education and Training Boards (ETBs), voluntary secondary schools, Community and Comprehensive (C&C) schools, Youthreach, institutes of technology and technological universities and those working in out of school services.

Background

Ireland has an internationally acknowledged, high-performing education system and a respected teaching profession (Teaching Council, 2010; OECD, 2013; DES, 2018a; OECD, 2015a; Comhairle na nOg, 2017; Growing Up in Ireland, 2017; Boyle, 2017; Boyle, 2019; Scanlon & McKenna, 2018; Kantar Millward Brown, 2018; EU Commission, 2018; EU Commission, 2019a; EU Commission, 2019b; Social Progress Initiative, 2018; United Nations Development Programme, 2018, HEA, 2019; Coolahan, 2017; Eivers, 2019; CSO, 2019a; McKeown et al., 2019; CSO, 2020b; OECD, 2020a; Eurofound, 2020; McNamara et al., 2020; Clerkin and Perkins, 2020; Clark & Kavanagh, 2021; OECD, 2021a; CSO, 2021; EU Commission/EACEA/Eurydice, 2021; Indecon, 2020; Purdy et al., 2021; CSO, 2022a; DE, 2021b; Smyth et al., 2022; Gabriel et al., 2022; Clark et al., 2022; Delaney et al., 2022; Clark et al., 2023, OECD, 2023b; Boyle, 2023). A Medical Council survey in 2023 found that

teachers were the most trusted profession in Ireland (RTE News, November 1st 2023). Boyle (2023) found that teachers were the most trusted public servants after doctors and nurses.

That is despite Ireland spending relatively little on education (OECD, 2015b; SJI, 2018, NERI, 2018, OECD, 2019a; UNDP, 2019; OECD, 2021a; Kovacic et al., 2021; CSO, 2022a; Clark et al., 2022; OECD, 2023a; OECD, 2024) and experiencing historic underinvestment (DES, 2018b). QQI (2023) also acknowledged a need for significant capital investment, especially in FE buildings in the ETB sector. The CSO (2022a) has stated that real expenditure per student in post-primary fell 5.8% between 2008 and 2018, and real expenditure per student in higher education fell 35%. Ireland also has the 8th largest class sizes in upper secondary in all of the EU/EFTA and EU candidate countries. In higher education, Ireland has extraordinarily large class sizes by international comparison i.e 23:1 compared to 15:1 (OECD, 2021a). Despite this, citizen satisfaction with the education system in Ireland is the highest of any of 22 European countries studied by Boyle (2018) whilst parent satisfaction with the Irish education system was the second highest out of fifty-six countries in Clerkin et al. (2020). Boyle (2021; 2023) found a high level of citizenship satisfaction with the education system in Ireland as well as Ireland being fourth in Europe in its ability to meet the needs of a competitive economy and also a greater ability by students in Ireland than the European average to deal with unusual situations and to overcome difficulties. Boyle et al. (2022) made broadly similar findings.

It is also worthwhile noting that 2019 data (OECD, 2019b) shows that both citizen satisfaction with the education system, and the economic return to the taxpayer of investment in education, are both extraordinarily high in Ireland compared to international norms (see also Smyth et al., 2022). An Ipsos MRBI survey in 2019 found extraordinarily high levels of public trust in teachers, much higher than for journalists, Gardai, civil servants, politicians, business leaders, social media influencers, bankers or even the “ordinary person in the street” (Irish Times January 31st, 2019). ESRI (2020) found very high levels of trust of young people in the Irish education system.

Ireland has a very young population (Eurostat, 2015; Government of Ireland, 2019; DCYA, 2020) despite some declines in younger age groups recently (CSO, 2024a). In 2008, we had

the second highest proportion of 10–14-year-olds in the European Union (CSO, 2009). The previously high birth rate in Ireland (CSO, 2017; Eurostat, 2017; Government of Ireland, 2019) and ongoing rate of natural increase (CSO, 2022c; CSO, 2022d) indicates that the population of young people is likely to remain high for the foreseeable future, especially after factoring in recent increases in inward migration (CSO 2024b). The DE (2021a) has estimated that the student population in post- primary will rise by approximately seven thousand students per year until reaching a peak enrolment of c.408k in 2024/25. However, recent migration figures indicate that the peak is now likely to peak in 2026 (DoE, 2024). Student numbers in higher education are also projected to rise substantially (DES, 2018d). In this context, it is not sufficient to suggest that a world- class child-centred society can be achieved with inadequate resources of time or personnel. Population growth generally is very significant and this has implications for the entire lifelong learning agenda. CSO data has shown that the overall population rose 97,600 in the year to April 2023, and one-fifth of the rise was natural increase (Irish Times, September 26th 2023). CSO (2024b) found another increase in population of almost 100,000 people in the year to April 2024. In terms of overall expenditure on education, Ireland and Greece were the only EU member states in 2015 to spend significantly less than the UN SDG 4 minimum of 4% of GDP on education (UNESCO, 2022). The DES (2018b) has itself acknowledged “historic underinvestment”.

The growing economy (ESRI, 2021; EU Commission, 2021; OECD, 2021b; IBEC, 2021; Central Bank, 2022; IMF, 2021; CSO, 2022b; ESRI, 2022a; ESRI, 2022b; CSO, 2023a; IBEC, 2023; Central Bank, 2023, EU Commission, 2024; Central Bank, 2024a; ESRI, 2024; Central Bank, 2024b), and healthy Government finances (CSO, 2023b) means that Government is in a good position to make a meaningful contribution to continue supporting students from under-represented target groups and/or migrant and refugee communities.

Proposed Registration Requirements

The TUI believes that the Teaching Council plays an important role as the regulator of the profession. It is important that teachers are properly qualified for the important job that they do. A firm but fair approach to registration requirements is important. It is also important that extended deadlines, such as those applying recently to teachers from Ukraine, are

available but without changing the overall registration requirements which apply to all teachers. The TUI has also welcomed the availability of Routes 1-5.

Having considered the proposed revised regulations the TUI has three key concerns. Firstly, it is unclear what, if any, subject registration requirements will exist into the future. Existing subject registration requirements are, on the whole, robust and not excessively granular. The TUI would welcome clarification as to whether these subject registration requirements will continue under the proposed revised system. The TUI would like to see retention of the existing subject registration requirements, together with the existing system of consultation with stakeholders, if requirements for an existing or new subject is to be devised. It is important that when new Senior Cycle subjects are introduced, e.g. Drama/Film/Theatre or Climate Action, that new subject registration requirements be devised prior to the new subject being rolled out in schools. If the requirements are not devised before the roll-out of a new subject specification, then those teachers that take on the introduction of the subject in the school should be given credit for the preparation and teaching of the subject.

Secondly, whilst taking note of the importance of spending time checking degree and vetting documents, it is important that the registration process for new and existing teachers be as simple as reasonably possible. The TUI is aware of many complaints from members to the effect that the process of registration and re-registration can often be lengthy in nature. In a time of teacher supply shortage, as noted by the Minister for Education (Irish Examiner August 28th 2024), it is vital that the Teaching Council plays its role in highlighting the impact teacher shortages will have on schools e.g. the dropping of curricular subjects and the frequent use of out-of-field or even unqualified teachers.

Thirdly, and most importantly, the Teaching Council needs to reverse the ill-conceived idea of longer duration for initial teacher education, e.g. the four-year concurrent degree and the two-year PME. Halving the duration of the PME, for example, would make the profession immediately and significantly more accessible to all in our society, particularly to those who cannot afford to pursue the profession. This is especially acute for people with industry experience who wish to come to teaching later on in life. Some may be able to save for a one-year course, but two years is an absolute impossibility for most. We are currently pricing a

whole cohort of potential teachers out of the profession. It is no longer acceptable that second-level teachers should have to complete a four-year degree followed by a two-year PME, being subsidised by family if they're fortunate enough to have this support or else being saddled with significant debt before they even apply for an initial teaching job that is unlikely to be on a permanent or full-time basis. Such a move would not just encourage more prospective teachers to consider the profession but would also free up over one thousand students teachers as qualified teachers within one year, thereby significantly alleviating the teacher supply crisis. As it currently stands 27% of existing teachers do not believe that they will be in the profession in ten years time (TUI survey April 2024). It is also deeply worrying that a TUI PDA survey in November 2024 found that 77% of schools had advertised teacher jobs in the previous six months for which there had been no applicants at all. Reducing the period initial teacher education, back to what it was previously would go a long way to alleviating this crisis. Alternatively Droichead could be incorporated into the second year of the qualification. As it stands it can take up to six years to become a qualified post-primary teacher and Droichead still awaits.

It is important that the Teaching Council highlight the role of permanent, full-time and well-paid teaching jobs in attracting and retaining teachers. As noted by the European Commission (2022: 12)

“financial incentives matter for recruiting and attracting teachers, as teacher remuneration needs to be competitive with comparable occupations”.

The European Commission (2022: 22) also noted that

“Teachers’ working conditions have been reported as ‘highly predictive’ of teachers’ stated intentions to remain in or leave their schools (Ladd, 2011; Barnett Berry et al., 2019)...One of the key aspects that affects teachers’ working conditions is class size”.

It is essential that teachers be prepared, following ITE, for the teaching world as currently manifests and also what it may look like in years to come. As noted by OECD (2023c: 15)

“Global megatrends such as globalisation, technological change, climate change and population ageing will continue to affect Irish society and economy, transforming jobs and how people consume, interact and spend their time. To thrive in the world of tomorrow, people

will need a stronger and better-rounded set of skills, and better use of their skills will need to be made in the labour market and workplaces.”

This issue is reinforced by Kovacic et al. (2021) which finds that teachers will be working in an environment where 8% of students live in consistent poverty whilst 15% are at risk of poverty, where Ireland has the one of the highest level of intergenerational transmission of educational disadvantage in Europe, but at the same time Ireland’s rate of participation in third-level education is the fourth highest in the EU.

It is also important to note that teacher registration, and in particular vetting and re-vetting, is not unduly influenced by minor matters outside of any relevance to teaching. For example, minor traffic infringements many years previously do not influence the ability of a teacher to teach a subject other than road safety now. However, it is important to note that the TUI is strongly of the view that serious criminal offences, such as those impacting on child safety, do need to be taken into account in the area of teacher registration and re-registration.

Conclusion

The TUI broadly welcomes the revised registration regulations but believes that the Teaching Council, as regulator of the largest profession in Ireland, needs to continue to promote the profession as well as regulate it. The Teaching Council should be a voice for teachers. Most importantly it is hard to justify Route 2 teachers requiring 120 ECTS credits when Route 3 teachers only require 60 ECTS credits. Both should be 60, with a large school/centre placement requirement being in operation.

Recommendations

The TUI would like to make the following recommendations to the Teaching Council:

- The subject registration requirements, as currently exist, should continue.
- The Teaching Council need to continue to highlight the teacher supply crisis.

- There should be ongoing bilateral and multilateral engagement with teacher representative organisations.
- It is vital that existing only qualified teachers or teachers in initial teacher education be able to register with the Teaching Council.
- Great care needs to be taken in deciding whether to recognise some iQTS qualifications.
- Existing ameliorations in timelines, but not overall requirements, which facilitate teachers qualified overseas or in warzones, e.g. Ukraine, should continue for as long as is reasonably possible. Such ameliorations should also be available to qualified teachers coming from other warzones where proof of qualification is available.
- The existing Routes 1-5 should continue.
- The requirement for child protection vetting and re-vetting must continue.
- The extended period of initial teacher education should cease. The ECTS requirement for Route 2 should be the same as for Route 3.
- Vetting is very important but should be proportionate in timing and extent in terms of taking account of minor offences which occurred years ago and are not connected in any way to schools or children.
- The Teaching Council needs to promote the profession as well as regulate it.
- Subject specification requirements for new subjects should always be in place prior to the introduction of that new subject.

Ends

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Glossary

C&C	Community and Comprehensive
CSO	Central Statistics Office
DCEDIY	Department of Children, Equality, Disability, Integration and Youth
DCYA	Department of Children and Youth Affairs (now DCEDIY)
DE	Department of Education (Now DoE)
DES	Department of Education and Skills (Now DoE)
DFHERIS	Department of Further and Higher Education, Research, Innovation and Science
DoE	Department of Education
ECTS	European Credit Transfer and Accumulation System
ESRI	Economic and Social Research Institute
ETB	Education and Training Board
EU	European Union
FE	Further Education
FET	Further Education and Training
GDP	Gross Domestic Product
GNI*	Gross National Income / Modified Domestic Demand
IBEC	Irish Business and Employers Confederation
iQTS	International Qualified Teacher Status
IMF	International Monetary Fund
IOT	Institute of Technology
NERI	Nevin Economic Research Institute
OECD	Organisation for Economic Co-operation and Development

PDA	Principals and Deputy Principals Association
PME	Professional Masters in Education
SDG	Sustainable Development Goal
SJI	Social Justice Ireland
UNDP	United Nations Development Programme
UNESCO	United Nations Educational Scientific and Cultural Organisation

References

- Boyle (2017), *Public Sector Trends 2017*, Dublin: Institute of Public Administration
- Boyle (2018), *Public Sector Trends 2018*, Dublin: Institute of Public Administration
- Boyle (2019), *Public Sector Trends 2019*, Dublin: Institute of Public Administration
- Boyle (2021), *Public Sector Trends 2021*, Dublin: Institute of Public Administration
- Boyle (2023), *Public Sector Trends 2023*, Dublin: Institute of Public Administration
- Boyle, R., O’Leary, F. & O’Neill, J. (2022), *Public Sector Trends 2022*, Dublin: Institute of Public Administration
- Central Bank (2022), *Q1 Quarterly Economic Bulletin*, Dublin: Central Bank of Ireland
- Central Bank (2023), *Q1 Quarterly Economic Bulletin*, Dublin: Central Bank of Ireland
- Central Bank (2024a), *The economic outlook for the Irish and euro area economies*, Dublin: Central Bank of Ireland
- Central Bank (2024b), *Q3 Quarterly Bulletin*, Dublin: Central Bank of Ireland
- Clark, C. & Kavanagh, C. (2021), *Measuring Progress: The Sustainable Progress Index 2021*, Dublin: Social Justice Ireland
- Clark, C., Kavanagh, C. and Bennett, C. (2022), *Measuring Progress: Economy, Society and Environment in Ireland*, Dublin: Social Justice Ireland
- Clark, C., Kavanagh, C. and Bennett, C. (2023), *Measuring Progress: Economy, Society and Environment in Ireland*, Dublin: Social Justice Ireland
- Clerkin, A. & Perkins, R. (2020), *TIMSS 2019: Ireland’s results in mathematics and science*, Dublin; Educational Research Centre
- Clerkin, A., Perkins, R. & Chubb, E. (2020), *The Home Learning Environment in Ireland: Insights from TIMSS 2015 in Ireland*, Dublin; Educational Research Centre
- Comhairle na nOg (2017), *So, How Was School Today?* Dublin: Department of Children and Youth Affairs

Coolahan, J. (2017), "I am Never Happier than When I am with Teachers and School Leaders", *Pushing Boundaries, Expanding Vistas: Celebrating the work of John Coolahan*, Walsh, T., Dolan, R. eds. (2019), Maynooth: Maynooth University Department of Education

CSO (2009), *Children and Young People in Ireland 2008*, Cork: Central Statistics Office

CSO (2017), *Vital Statistics Yearly Summary 2016*, Cork: Central Statistics Office

CSO (2019a), *Educational Attainment Thematic Report 2019*, Cork: Central Statistics Office

CSO (2019b), *Survey of Income and Living Conditions 2018*, Cork: Central Statistics Office

CSO (2020a), *Survey of Income and Living Conditions 2019*, Cork: Central Statistics Office

CSO (2020b), *Measuring Ireland's Progress 2018*, Cork: Central Statistics Office

CSO (2021), *Measuring Ireland's Progress 2019*, Cork: Central Statistics Office

CSO (2022a), *Measuring Ireland's Progress 2020*, Cork: Central Statistics Office

CSO (2022b), *Quarterly National Accounts and International Accounts Quarter 4 2021 and Year 2021 (Preliminary)*, Cork: Central Statistics Office

CSO (2022c), *Census of Population 2022, Preliminary Results*, Cork: Central Statistics Office

CSO (2022d), *Vital Statistics Yearly Summary 2021*, Cork: Central Statistics Office

CSO (2023a), *Preliminary GDP Estimate Quarter 4 2022*, Cork: Central Statistics Office

CSO (2023b), *Government Finance Statistics Annual - Provisional estimates 2019-2022*, Cork: Central Statistics Office

CSO (2024a), *Measuring Ireland's Progress 2022*, Cork: Central Statistics Office

CSO (2024b), *Population and Migration Estimates, April 2024*, Cork: Central Statistics Office

DCYA (2020), *Income, Poverty and Deprivation Among Children: A statistical baseline analysis*, Dublin: Department of Children and Youth Affairs

DE (2021a), *Regional Projections of Full-time Enrolments, Primary and Second Level, 2021 to 2036*, Dublin: Department of Education

DE (2021b), *Education Indicators for Ireland 2021*, Dublin: Department of Education

Delaney, E., McAteer, S., McHugh, G. & O'Neill, B. (2022), *Primary School Reading in Ireland in PIRLS 2016: Perspectives of pupils, parents and teachers*, Dublin: Educational Research Centre

DES (2018a), *Chief Inspector's Report 2013-2016*, Dublin: Department of Education and Skills Inspectorate

DES (2018b), *Opening Statement to the Joint Oireachtas Committee on Education and Skills*, August 29th, 2018

DES (2018c), *Minister's Brief: Overview*, Dublin: Department of Education and Skills

DES (2018d), *Projections of Demand for Full-Time Third Level Education 2018 to 2040*, Dublin: Department of Education and Skills

DoE (2024), *Statistical Bulletin – August 2024*, Dublin: Department of Education

Eivers, E. (2019), *Left to their Own Devices: Trends in ICT at primary school level*, Cork: Irish Primary Principals Network

ESRI (2020), *Growing Up in Ireland - The Lives of 17/18 Year Olds*, Dublin: Economic and Social Research Institute

ESRI (2021), *Quarterly Economic Commentary, Winter 2021*, Dublin: Economic and Social Research Institute

ESRI (2022a), *Quarterly Economic Commentary, Spring 2022*, Dublin: Economic and Social Research Institute

ESRI (2022b), *Quarterly Economic Commentary, Summer 2022*, Dublin: Economic and Social Research Institute

ESRI (2024), *Quarterly Economic Commentary, Spring 2024*, Dublin: Economic and Social Research Institute

EU Commission (2018), *Labour Market Policy Thematic Review 2018*, Luxembourg: Publications Office of the European Union

EU Commission (2019a), *Country Report Ireland 2019*, Brussels: European Commission

EU Commission (2019b), *Education and Training Monitor 2019*, Brussels: European Commission

EU Commission (2021), *Autumn 2021 Economic Forecast*, Brussels: European Commission

European Commission (2022), *Interim Report of the Commission Expert Group on Quality Investment in Education and Training*, Luxembourg: Publications Office of the European Union

EU Commission (2024), *Economic Forecast for Ireland: Spring 2024 Economic Forecast*, Brussels: European Commission

EU Commission / EACEA / Eurydice (2021), *Adult education and Training in Europe: Building inclusive pathways to skills and qualifications*, Luxembourg: Publications Office of the European Union

Eurofound (2020), *Living and Working in Europe*, Luxembourg: Publications Office of the European Union

Eurostat (2015), *Being Young in Europe Today*, Luxembourg: Publications Office of the European Union

Eurostat (2017), *Fertility Statistics*, Luxembourg: Publications Office of the European Union

Gabriel, F., Marrone, R., Van Sebille, Y., Kovanovic, V. & De Latt, M. (2022), "Digital education strategies around the world: practices and policies", *Irish Education Studies*, 41 (1), 85-106

Government of Ireland (2019), *Health in Ireland: Key trends 2019*, Dublin: Department of Health

Growing Up in Ireland (2017), *Key Findings: Infant cohort at 7/8 years, School and learning*, Dublin: ESRI

HEA (2019), *Public Perceptions of Higher Education in Ireland*, Dublin: Higher Education Authority / Kantar MillwardBrown

Holt-White, E., Montacute, R. & Tibbs, L. (2022), *Paving the Way: careers guidance in secondary schools*, London: Sutton Trust

IBEC (2021), *Q4 Quarterly Economic Outlook*, Dublin: Irish Business and Employers Confederation

IBEC (2023), *Economic Outlook for Q1 2023*, Dublin: Irish Business and Employers Confederation

IMF (2021), *Country Report: Ireland*, Washington DC, USA: International Monetary Fund

Indecon (2020), *International Education Strategy Review*, Dublin: Indecon / Department of Higher and Further Education, Research, Innovation and Science

Kantar Millward Brown (2018), *Our Faith in Institutions*, Dublin: Kantar Millward Brown

Kovacic, T., Forkan, C. Dolan, P. & Rodriguez, L. (2021), *Enabling an Inclusive and Equitable Quality Education for All*, Galway: UNESCO Child and Family Research Centre, NUI, Galway

ed. Lodge, A., Lynch, K. (2004), *Diversity at School*, Equality Authority

McKeown, C., Denner, S., McAteer, S., Shiel, G., O’Keeffe, L. (2019), *Learning for the Future: the performance of 15-year-olds in Ireland on reading literacy, science and mathematics in PISA 2018*, Dublin: Educational Research Centre

McNamara, E., Murphy, D., Murray, A., Smyth, E. & Watson, D. (2020), *The Lives of 17/18 Year Olds*, Dublin: Growing Up in Ireland

NERI (2018), *Quarterly Economic Observer, Summer 2018*, Dublin: Nevin Economic Research Institute

OECD (2013), *Education at a Glance 2013*, Paris: OECD Publishing

OECD (2015a), *Government at a Glance 2015*, Paris: OECD Publishing

OECD (2015b), *Education at a Glance 2015*, Paris: OECD Publishing

OECD (2019a), *Education at a Glance 2019*, Paris: OECD Publishing

OECD (2019b), *Government at a Glance 2019*, Paris: OECD Publishing

OECD (2020a), *Education Policy Outlook Ireland*, Paris: OECD Publishing

OECD (2020b), *Education in the Digital Age: Healthy and Happy Children*, Paris: OECD Publishing

OECD (2021a), *Education at a Glance 2021*, Paris: OECD Publishing

OECD (2021b), *Economic Forecast Summary*, Paris: Organisation for Economic Co-operation

and Development

OECD (2023a), *Education at a Glance 2023*, Paris: OECD Publishing

OECD (2023b), *PISA 2022 Results (Volume 1): The State of Learning and Equity in Education*, Paris: OECD Publishing

OECD (2023c), *OECD Skills Strategy Ireland: Assessment and Recommendations*, Paris: OECD Publishing

OECD (2024), *Education at a Glance 2024*, Paris: OECD Publishing

Purdy, N., Logue, J., Montgomery, M., O'Hare, K., Redpath, J. & Demie, F. (2021), *A Fair Start*, Belfast: Expert Panel on Educational Underachievement in Northern Ireland

QQI (2023), *Quality Assurance of Further Education and Training in the ETB Sector*, Dublin: Quality and Qualifications Ireland

Scanlon, G. & McKenna, G. (2018), *Home Works: A study on the educational needs of children experiencing homelessness and living in emergency accommodation*, Dublin: Children's Rights Alliance

SJI (2018), *Poverty Focus 2018*, Dublin: Social Justice Ireland

SJI (2021), *Education and COVID-19*, Dublin: Social Justice Ireland

Smyth, E., Devlin, A., Bergin, A. & McGuinness, S. (2022), *A North-South Comparison of Education and Training Systems: Lessons for Policy*, Dublin: Economic and Social Research Institute

Social Progress Initiative (2018), *Social Progress Index 2018*, Washington DC, USA: Social Progress Imperative

Teaching Council (2010), *Evaluation of Public Attitudes to the Teaching Profession*, Maynooth: Teaching Council

United Nations Development Programme (2018), *Human Development Indices and Indicators: 2018 statistical update*, New York: United Nations

UNDP (2019), *Human Development Report 2019*, New York: United Nations Development Programme

UNESCO (2022), *SDG 4 Data Digest 2021*, Montreal, Canada: UNESCO