

Draft criteria for the accreditation of Initial Teacher Education programmes in Wales and the proposal for the Education Workforce Council to accredit initial teacher education

Consultation response form

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Responses should be returned by **14 November 2016** to

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or completed electronically and sent to:

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Question 1 – Should the EWC have the statutory responsibility for accrediting all programmes of initial teacher education (ITE) in Wales?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments

Professional bodies in teaching, health, the law, engineering, social care and other professions in the UK and across the world generally have the same statutory responsibilities in relation to regulation, namely to:

- set standards for education and training;
- set standards of competency or proficiency;
- set standards of conduct;
- set standards of continuing professional development;
- maintain a Register of persons deemed suitable to practise;
- investigate complaints raised about a person’s “fitness” to practise their particular profession.

In establishing the EWC, the Education (Wales) Act 2014 did not afford the Council with the powers under bullets 1, 2 and 4, meaning that its powers to fulfil the aims set out in section 3 of the Act are weaker than those of other professional bodies, including the Care Council for Wales (the other statutory regular based in Wales).

The Council therefore firmly welcomes the proposal for the EWC to have the statutory responsibility to accredit all programmes of ITE in Wales. The Council believes this decision signifies an important step in further establishing the EWC and building its credibility and worth to registrants, stakeholders, learners, parents, guardians and the general public. The Council agrees with the statement by the Welsh Government at paragraph 3.4 of the consultation document that this proposal “signals trust in the profession and is in line with the ethos that the profession must take responsibility for leading changes in teaching, leadership and for developing and supporting the profession collectively”.

However, the Council wishes to highlight the following points:

- Having made a decision to extend professional registration and regulation to six other groups in the education workforce (FE teachers, school and FE learning support staff, work based learning practitioners, youth and youth support workers), the Council considers it irregular for the Welsh Government to propose to extend its responsibilities to accrediting **school teacher training programmes only**. There are, for example no current arrangements in place to accredit FE postgraduate programmes in Wales and yet those who complete such programmes may in future teach the same subjects as those who complete school teacher training, but in a different setting. In Ireland, the teaching council accredits both school and FE programmes.

The Council invites the Welsh Government to develop legislation which is sufficiently broad to allow it to accredit professional programmes for

other registrant groups in time.

- At present, two employment based routes to becoming a qualified teacher exist in Wales – the Graduate Teacher Programme and Teach First Cymru. The Council believes that it would be logical for it to also accredit employment based routes programmes, particularly as the professional standards that trainees undertaking such programmes will be the same as for their colleagues undertaking initial teacher education programmes. (The Council notes that the Welsh Government has announced the closure of Teach First Cymru and is considering what employment based routes might exist in Wales in future).

Question 2 – Should the EWC establish a Teacher Education Accreditation Committee?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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If no, please specify the further detail that should be provided.

Such a Committee is commonplace in other professional bodies. Similar to existing arrangements established by other teaching councils in the UK and across the world, the Council believes that a Committee of this nature should comprise representatives with knowledge and expertise in three specific areas: ITE, schools and the inspection of ITE. However, the Council suggests that as in a number of other professions, there may be value in having a “lay” presence on the Committee. They would help the Council to demonstrate its commitment to maintaining public trust and confidence in the registered professions, through its regulatory work. Indeed, Welsh Government legislation requires lay representation on EWC Fitness to Practise Committees.

The EWC has a sound knowledge and understanding of the most effective accreditation systems elsewhere and this will assist it in introducing such a Committee in Wales. The EWC also has extensive experience (through its Fitness to Practise role) of establishing Committees to undertake specific statutory, regulatory responsibilities.

Question 3 – Do you agree that the criteria for the accreditation of ITE in Wales, as set out at Annex A, provides sufficient detail for the development of initial teacher education programmes?

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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If no, please specify the further detail that should be provided.

The EWC’s Chief Executive was a member of the Task and Finish group established to develop the draft criteria for consultation.

In developing new criteria, Council is aware that the group has sought to strengthen certain aspects of the existing criteria, with a view to improving the quality of provision in Wales. For example the new criteria sets out:

- a clear vision from the Welsh Government as to its future aspirations for high quality ITE provision, building upon “Qualified for Life”
- the importance of attracting high-calibre entrants to teacher training in Wales
- a recognition that high quality professional education involves a number of different modes of learning and, in turn a need for programmes to be planned and run in true partnership between HEIs and a number of “lead schools”, with strong links between theory and practice
- clear expectations upon partner schools
- the need for provider partnerships to have a clear vision, strong leadership / management / staffing arrangements, robust staff development strategies and the evidence of a “scholarly culture”
- the need for provider partnerships to develop research knowledge and skills
- a requirement that new teachers are prepared in order to deliver against the improved education agenda set out in Qualified for Life

The Council welcomes the new criteria and believes that they set out sufficient detail to achieve the aims above, but with one exception. However, the Council notes that the professional standards which trainee teachers will need to meet in order to gain Qualified Teacher status are missing from the criteria.

The Council is aware that the Welsh Government is planning to consult on revised standards in the Spring, with a view to their publication in September. Given that the timetable on page 11 states that provider partnerships must submit their programmes to the Accreditation Committee by 1st December 2017, the Council considers it essential that work on the standards develops at sufficient pace. It is important that provider partnerships have the new standards in sufficient time to prepare their submissions to the Accreditation Committee.

Question 4 – Do you agree with the roles and responsibilities proposed for schools and HEI (higher education institution) partnerships?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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If no, please specify the further detail that should be provided.

International evidence shows that the best examples of teacher education across the world are based on a form of learning that involves strong learning experiences both academically (within a HEI) and practically (within schools).

The Council considers that the much greater emphasis placed in the new criteria on stronger partnerships between HEIs and schools and also the specific requirements that each will need to individually deliver, to be appropriate and positive.

Question 5 – Do you agree with the overarching requirements that accredited providers must meet for all programmes of ITE study?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
If no, please explain why.					
<p>The Welsh Government is proposing that in future it is “programmes of ITE” that are accredited rather than “providers of the programmes”, however the two are of course interlinked. The Council supports this important change to existing arrangements, one which is consistent with arrangements in education and other professions worldwide.</p> <p>The criteria set out in detail the requirements of programmes if they are to be accredited in future. However, the Council reiterates its point from question 3 that the absence of the revised QTS standards at this stage is disappointing, meaning that providers are not afforded the details they require in respect of programme outcomes at this stage.</p>					

Question 6 – Do you agree with the entry and selection minimum standard requirements for student teachers in Wales?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
If no, please explain why.					
<p>The Council fully supports the Welsh Government’s aspirations for high calibre recruits to ITE in Wales.</p> <p>The Council is aware anecdotally that the minimum qualification requirements of a GCSE grade B (or equivalent) in English and / or Welsh and Mathematics is having an effect on recruitment to programmes, given that the requirements differ in England. The Council asks the Welsh Government to keep this entry requirement under review.</p>					

Question 7 – Do you agree with the principal that the EWC should have the power to charge a fee (which will be subject to a separate consultation) for the consideration of applications, which will be payable by HEIs participating in the accreditation process?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
If no, please explain why					
<p>The Council has fully researched the likely costs of its proposed new role in accrediting ITE programmes in future. The Council is aware that in some other</p>					

jurisdictions (for example Ireland), the professional body charges providers to submit their programmes for accreditation.

The EWC is funded by practitioner registration fees which are set by government rather than the Council itself, therefore if fees are not charged, such work will need to be funded by practitioners. On this basis, the Council believes that the Council should have the power to charge a fee. The Council adds that this may also encourage partner providers to think seriously about their commitment to delivering ITE in Wales, knowing that there is a charge for submitting each programme for accreditation.

Question 8 – How could the policy under consideration be formulated or revised so that it would have positive effects, or increased positive effects, on:

- (a) opportunities for persons to use the Welsh language?
- (b) treating the Welsh language no less favourably than the English language?

Supporting comments

It is essential that ITE provision in Wales ensures that prospective teachers who wish to train through the medium of Welsh, are able to do so. It is also imperative that all ITE programmes have an enhanced requirement to develop Welsh language skills at all levels given the aims set out in Professor Donaldson's review and the Welsh Government's aspirations for a million Welsh speakers by 2050.

The draft criteria make references to the Welsh language however, it is essential that the EWC and the Welsh Government have due regard to Welsh language provision when accrediting programmes and in determining funded places for each programme / provider.

Question 9 – How could the policy under consideration be formulated or revised so that it would not have adverse effects, or so that it would have decreased adverse effects, on:

- (a) opportunities for persons to use the Welsh language?
- (b) treating the Welsh language no less favourably than the English language?

Supporting comments

Further to its comments under question 8, the EWC considers that HEIs would need to be aware of the need to recruit staff that can competently develop Welsh language teaching skills across all phases and subjects, be that on Welsh medium or English medium ITE courses.

In addition, partnerships with schools will be important in mitigating any potential gaps in HEI provision, so the development of teachers with competency in the Welsh language appropriate to phase and setting is seen as a shared responsibility.

Question 10 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Supporting comments

The EWC warmly welcomes the proposal in this consultation for it to accredit ITE programmes in future. However, as explained in its response to question 1, the EWC currently finds itself in a position where it does not have responsibility for determining the professional standards for the professions it registers and regulates.

Given that ITE programmes are underpinned by the QTS standards, it will be particularly irregular for government to trust the teaching profession (through its professional body) to accredit its entry programmes yet still retain responsibility itself for the standards that underpin these programmes. This is inconsistent when compared to other professional bodies both within teaching and other disciplines (such as health, the law and social care) in the UK and across the world. It will also be irregular if pay and conditions for teachers are devolved to Wales, as has been announced this week.

The previous Minister for Education and Skills set out his intention to Cabinet in July 2015 to consult in early 2016 on extending the powers of the EWC to include responsibility for setting professional standards in future. This commitment to “develop the role of the EWC so that it supports a high-status profession” is also set out by the Welsh Government in key document such as “Qualified for Life” and in a number of places in this consultation document (for example paragraphs 2.22, 2.23, 3.4).

The Council, therefore, invites the Welsh Government to set a timescale when it will consult on extending the EWC’s powers to determining the professional standards for its registered professions. Given that the Welsh Government is intending to consult on revised professional standards for school and FE teachers in Spring 2017, this would seem to be an appropriate time to also consult on extending the EWC’s responsibilities in relation to professional standards in the future.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: