

New professional standards for teaching and leadership in schools

Consultation response form

Your name: Education Workforce Council (EWC)

Organisation (if applicable): Education Workforce Council (EWC)

e-mail/telephone number: 029 20460 099

Your address: 9th Floor, Eastgate House, 35-43 Newport Road, Cardiff, CF24 0AB.

Responses should be returned by 4 May 2017 to:

Professional Frameworks and Standards Team
Curriculum Division
Education and Public Services Directorate
Welsh Government
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and sent to:

e-mail: professionalstandardsreview@wales.gsi.gov.uk

Question 1: Do you agree that the proposed new professional standards should reflect this vision? [i.e. the vision for teaching and leadership as outlined on page 5 of the consultation document]

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

Supporting comments

Council welcomes this consultation on the basis that such a review and refresh of the professional standards for teachers is long overdue. It is also timely to consider the standards as we move to implementing key policy developments in Wales such as “Successful Futures”, “Teaching Tomorrow’s Teachers” and the aspiration of achieving one million Welsh speakers by 2050.

Findings from the national workforce survey highlight that the current standards are not sufficiently engaged with by teachers. We are encouraged that the consultation seeks to change this. We also commend Welsh Government for their commitment to engaging with stakeholders throughout the standards development process and through the consultation period.

We invite consideration of the following points:

- We are aware of the protracted genesis of the standards (with developmental work beginning in December 2014) and we would suggest that Welsh Government might want to approach the standards more strategically in light of the moves towards devolving pay, terms and conditions for teachers in Wales.
- On a practical note, Council is of the view that the proposed vision is rather long and we think that a shorter, more succinct version would have greater impact and be more readily engaged with and supported by teachers. It might be worth considering whether teaching and leadership require separate visions.

Question 2: Do you agree these principles and purposes are appropriate to the new education agenda in Wales?

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

Supporting comments

We agree that the proposed principles and purposes are appropriate to the new education reform agenda in Wales.

We invite consideration of the following points:

- There may be value in considering simplifying the wording of the “principles and purposes” in order that they are easily understood by practitioners, schools and others. Furthermore, it is essential that the standards are accessible, authentic and meaningful for practitioners. For standards to be truly progressive and developmental, practitioners need to engage with them and own them, this is linked to professionals taking an autonomous and active role in their own development.
- Council notes that this is the first opportunity that many teachers and stakeholders have had to engage with the standards in their totality rather than separate sections / descriptors. We would like to observe that the current format of the standards is not very ‘user-friendly’, or easy to read. We understand that it is the Welsh Government’s intention to present the standards in a “dynamic” format. We would welcome a final format that is as “user friendly” as possible.
- As a standards body with a legislative remit that explicitly emphasises the EWC has a significant role in standards,

Principal aims of the EWC in the Education (Wales) Act 2014

(a) to contribute to improving the standards of teaching and the quality of learning in Wales, and

(b) to maintain and improve standards of professional conduct amongst teachers and persons who support teaching and learning in Wales

we are strongly of the view that standards rightly should be owned, developed and promoted by a profession, through its professional body working with its registrants and stakeholders. This is the model followed successfully in many jurisdictions within the UK and internationally. Indeed, it is the model that the Welsh Government has established for social care in Wales (through Social Care Wales – formerly the Care Council for Wales).

Furthermore, given the moves to devolve teachers’ pay, terms and conditions, we would question the appropriateness of the Welsh Government (ie the body determining pay etc) also being the body responsible for establishing and ‘owning’ teachers’ professional standards.

Question 3 : Do you agree that the values and dispositions, the five dimensions and their elements describe an appropriate shared purpose for all school teachers and leaders?

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

Supporting comments

Council welcomes organising the standards into five sections. We are also very pleased to see pedagogy given so much emphasis in the new standards.

We incite consideration of the following points:

- We note that the revised standards are “conceptually” very different to the current standards. Many of the statements describe the behaviours or aspirations of the learner rather than the expected knowledge and practice of the teacher. In other standards models internationally, one will see phrases such as “understand”, “know”, and “be able to”. This is so the standards remain applicable to current registrants in maintaining their fitness to practise, as well as prospective registrants who have not yet started practising and are applying for registration for the first time. Indeed, in the consultation document, reference is made to ‘knowledge and skills’ (e.g. pages 6 and 7) but in the standards proper, different language is used.
- Because of the different approach to the standards, the Council feels it necessary to point out that the proposed standards would hamper rather than help us in our statutory fitness to practise work which involves assessing areas of practitioner competence. The consultation document refers to ‘capability or competency procedures’ (page 12) but we would like to reiterate that in their current form, the proposed standards are not suitable to be readily used for this purpose.

Council would also encourage Welsh Government to consider re-establishing the EWC Code of professional conduct and practice into the standards as this would provide an element of commonality, congruity and coherence both throughout a professional’s career and between registrant groups. Removing the Code from the standards is a retrograde step with no clear rationale.

- Council welcomes the philosophy in the consultation document that the standards should not be only used for performance management. However, we think that in practise these standards will form part of school performance management processes. It is important therefore that the standards are able to be used for multiple purposes. For example, at the end of ITE, awarding bodies need to make an assessment of the student teacher against the QTS standards, similarly, at the end of Induction, an assessment has to be made.

We are concerned that if these standards are not designed to be used in this way, that other ‘assessment tools’ will need to be developed to help headteachers, governors, and line managers with performance management and competency procedures and decisions. There is a danger that important discussions and decisions around teacher performance will not be guided by national standards consistently applied, but rather headteachers or local authorities may feel the need to invent separate mechanisms to support them in this work.

Question 4: Do you agree the descriptors attached to each element capture appropriate requirements at entry to the profession and for sustained highly effective teaching?

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

Supporting comments

The Welsh Government has clearly made significant effort to ensure that the descriptors capture appropriate requirements at both entry and thereafter. The Council welcomes this intention.

Council believes that if the standards are to be used and engaged with they need to be clear, concise and accessible. Council would suggest that standards that require analysis and deciphering will be seen as onerous and will not be used as readily as more intelligible ones since teachers, as we know from the recent national workforce survey, are “time poor”. This is not to take a reductionist approach to the work teachers do but rather to propose that this complex work need not be expressed in a complicated way.

We would be pleased to see the Welsh Government consider whether refinements could be made in order to make the proposed standards more user-friendly, for example:

- the terminology is new. We have, ‘Elements / descriptors / dimensions’. The relative relationship, hierarchy and meaning of these categories and the statements that fall within them may be unclear to some teachers;
- the standards could be viewed as rather diffuse, unwieldy, and unmanageable when trying to look at the them holistically and the sheer number of statements may be off putting;
- despite the number of statements, we still think there are a number of key areas which need to be emphasised more clearly and brought to the fore in the proposed standards, for example, planning for learning, knowledge and application of range of assessment techniques, and knowledge and understanding of how children and learners develop and learn. Without this last, in particular, a professional cannot develop pedagogic knowledge and skills;
- looking at the descriptors, there is in places inconsistency in the proposed standards with some describing very broad areas of practice and others narrower. Beyond that, on occasion, it is sometimes difficult to discern clear progression and development between QTS and PTS;
- as the point above, the vocabulary used in the standards needs to be consistent.

We appreciate that the proposed standards have been through a protracted period of drafting and revision often in a piecemeal fashion, we hope that a thorough process of proofing and correction can now be completed to ensure consistency throughout and help teachers to make best use of them.

Question 5: Do you agree the descriptors attached to each element support teachers and leaders to take responsibility for their career-long professional learning?

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

Supporting comments

Council believes that any set of standards should be progressive. We therefore welcome the emphasis on developing professionals beyond the attainment of the Induction standard. This is common to many of the international standards frameworks, and we feel it is a good starting point to encourage the reflective and learning engaged teachers that Wales needs.

Council believes that it is important to recognise however, that using standards as the sole lever to encourage professional development is asking a lot of a set of standards, as well as teachers using them. Welsh Government is encouraged to look at other policy drivers and mechanisms, ideally aligned with the standards, with which to facilitate effective professional learning amongst teachers.

We recognise that there are many variables in a teacher's professional career which can affect engagement with professional development, for example, the availability of suitable opportunities and funding, the culture of their place of work, the disposition of their line manager. Using the standards as a lever for ongoing professional learning makes it even more imperative that the descriptors can be easily understood, and applied across a range of contexts.

Question 6: Do you agree the leadership descriptors describe appropriately the leadership expectations on all teachers and for those who choose to move into formal leadership roles, up to and including headship?

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

Supporting comments

Please refer to comments made on questions 3, 4, and 5.

Over and above our general points outlined in the previous questions, Council feels some specific responsibilities relevant to leaders which have been omitted from the proposed standards, for example safeguarding.

Question 7: Do you agree that making the professional standards available online and through the Professional Learning Passport is the most appropriate means of enabling teachers and leaders to engage with the standards?

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

Supporting comments

The Council very much welcomes the proposal to incorporate the professional standards within the Professional Learning Passport (PLP). The current standards are incorporated within the PLP, and the Council is working with the Welsh Government with a view to also making the PLP the home of the revised standards.

The purpose of the PLP is to provide practitioners with a standardised national e-portfolio to help them in planning their professional learning, recording it and reflecting upon it. A key part of such a process ought to include consideration of the professional standards.

Beyond the PLP, we would ask the Welsh Government to consider ways of making the standards accessible to all, including, for example, people affected by sight loss or the partially sighted.

Question 8: Do you agree that the approaches recommended for working with the standards will have greatest impact on professional practice?

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

Supporting comments

The proposals for how the standards should be used by teachers, schools and others are well-meaning and appropriate. As stated in response to question 4, we invite the Welsh Government to consider how it can make the standards as readable and user-friendly as possible in order to assist teachers in working with them.

Council is aware that work has begun in developing standards for learning support staff, lecturers in Further Education, and work-based learning practitioners. Council is of the view that developing career pathways between registrant groups could and should be facilitated if the professional standards can be aligned. We hope that this work is not a missed opportunity.

Question 9 : Do you consider the proposed timescale and the arrangements for moving to the new standards to be realistic?

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

Supporting comments

The EWC believes the timescales are tight. There would appear to be limited time for the Welsh Government to fully consider comments from the consultation, make revisions and launch in readiness for September. This is likely to put considerable pressure on officials.

While we understand the philosophy on ownership of the standards, as outlined on page 14 of the consultation document, we would caution that in practice headteachers and leaders will find it difficult and cumbersome to work with different sets of standards at the same time with individual members of staff.

In respect of QTS, the EWC opened the new ITE programme accreditation arrangements in mid-March, through which partnerships must submit their programmes by 1 December. Given that partnerships will need their programmes academically validated in advance of this date, it is important that they have the standards available to them as early as possible.

In more general terms, we would suggest that Welsh Government consider the implications of devolved pay terms and conditions for teachers on these standards and, in turn any impact on the 'pay standards' for teachers.

Question 10 – We would like to know your views on the effects that the proposed new professional standards would have on the Welsh language, specifically on:

- i) opportunities for people to use Welsh
- ii) treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Supporting comments

Welsh Government may wish to consider any implications of the 'million Welsh speakers' strategy may have on teacher standards.

Question 11 – Please also explain how you believe the proposed standards could be formulated or changed so as to have:

- i) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language
- ii) no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Supporting comments

Please refer to our answer to question 10.

Question 12 – 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.

Under the Education (Wales) Act 2014, seven groups are now required to register with the EWC. The Council commends the Welsh Government for its foresight in establishing the most extensive public register for education and training worldwide. While the Council is pleased that developmental work has begun on professional standards for other registrant groups, the Council believes that there would have been benefits in drafting standards for all groups at the same time.

The Council considers it essential that high quality exemplification is prepared to help practitioners to use the standards. It is also important that they are promoted otherwise as shown by the recent national workforce survey, some teachers are likely not to use them. The Council is aware of a number of models of exemplification and promotion that work well in other jurisdictions worldwide.

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:

