

# **EWC response to the Welsh Government consultation, Public good and a prosperous Wales – the next steps**

## **Introduction**

1. The Education Workforce Council (EWC) is the largest regulator in Wales, having over 80,000 education professionals on our Register. We independently regulate teachers and support staff in maintained schools and further education institutions, work-based learning practitioners and youth / youth support workers. Our legislative remit charges us with raising the status of the education workforce by maintaining and promoting the highest standards of professional practice and conduct in the interests of education practitioners, learners, and the general public.
2. Our current remit includes the further education and work-based learning sectors, but we also have a role in the accreditation of programmes of initial teacher education and training which may be delivered by HEIs. Our response will mainly focus on areas within our remit or which relate to our remit.

## **Regulation**

3. We are concerned to see that this second consultation repeats errors we pointed out in our response to the first consultation, in that, there is a failure to grasp the full picture of regulation in the PCET sector. We reiterate our comments here:

‘The EWC is disappointed to note that it is not mentioned as a regulator in relation to the FE and WBL sectors with a legislative remit for standards. We think that our remit and reach across sectors has the potential to be a harmonising and coherent influence on complex sector and we would welcome working (within our remit) with Welsh Government on their agenda for PCET reform.’

4. We would also like to repeat our comment from our response to the first consultation that:

‘It is pertinent to point out that HE practitioners are not currently required to register with the EWC, unlike those in school, FE, WBL and youth work settings in Wales. The Welsh Government may wish to consider this’.

## **Sixth forms**

5. The consultation notes that there were few responses from the school sector to the first consultation. With that in mind, we would recommend a more proactive approach to engagement with the sector in developing further proposals for school sixth forms, in order to establish a mandate for any future change.

6. Throughout the consultation document, sixth forms seem to be exempt from many of the proposals. We are also concerned that proposed changes should not increase bureaucracy or duplicate work. The recognition that sixth forms would require different approaches and mechanisms is welcome, but also raises the question of whether school sixth forms are a good 'fit' with the wider sector. We would not like to see this distinctive part of our post-16 provision get 'lost'.
7. Council is also concerned that removing sixth forms from local authority control, subsuming them into a large body removes local accountability for this unique element of our education provision.

### **Quality assurance and enhancement**

#### **Question 47 - Do you agree with the proposed scope of the Commission's role in relation to quality enhancement? If not, what would you change?**

8. We would like to remind Welsh Government that the EWC now has a role in the accreditation and compliance monitoring of initial teacher training in Wales. We trust that these functions will be factored into any final QA framework. We are concerned that the consultation document makes no mention of this work, for example in paragraphs 160, 164.

### **Workforce development**

#### **Question 48 - How could the Commission's role in workforce development be tailored to reflect the needs of different sectors and providers?**

9. The rationale for the Commission's role in workforce development as set out in paragraph 189, does not present a complete picture of the current situation, in that the EWC already has a remit set out in legislation for standards of teaching in the FE and WBL sectors, and recruitment into the profession and sectors where we regulate. We are concerned that this proposal potentially duplicates a function already being undertaken, or at the least might contribute to further complexity and confusion in the sectors.
10. Further, we believe, as is the case in many other jurisdictions and professions, that professional standards should be developed and 'owned' by the professional body, in the case of the FE and work-based learning sectors that would be the EWC. It seems anomalous that responsibility for standards should be devolved to a funding / QA body. Any such change would require a stronger rationale in order for it to be understood and accepted.
11. Welsh Government officials were invited to present details of the reform plans to the EWC Council at its March meeting. Officers have also been members of a Welsh Government stakeholder engagement group. We are therefore disappointed by the apparent lack of understanding of the Council's core statutory remit.

12. We would also seek clarification as to why the consultation fails to mention any similar professional standards for the workforce in HE.

## **Other comments**

### **Governance**

13. Council is concerned that the governance model proposed for the Commission (pages 17 and 18) is unrealistic. While we acknowledge that modern practice favours smaller boards or councils, suggesting that a 15 member body will be able to service the number of committees outlined in the consultation document seems ambitious. Moreover, we wonder whether there is sufficient breadth of expertise in the sector to enable appointments to the Commission.

### **Proposed functions**

14. Council would urge officials to revisit the rationale for a new body. Initially FE/HE reform was focused on improving funding arrangements in the sector. However, the additional proposed functions for the Commission, as set out in the consultation document, don't have a clear rationale and, it seems, also lack support from the sector itself.
15. We would urge officials to look at alternative ways of delivering the changes required in the sector. Alternatives which may be cheaper and faster to realise than establishing a Commission tasked with an extremely diverse range of functions and responsibilities. The recent actions of the Scottish Government in shelving part of the Education (Scotland) Bill, might be instructive in this regard.
16. If there is a strong case for a Commission, we would urge incremental change. We would recommend that the Commission start out by fulfilling functions around funding, and only at such time that the sector agrees that improvements are tangible, then perhaps the Commission could think about moving into some of the other functions proposed.