

Dogfennau Ategol – Y Pwyllgor Plant, Pobl Ifanc ac Addysg

Lleoliad: I gael rhagor o wybodaeth cysylltwch a:
Ystafell Bwyllgora 1 – y Senedd Llinos Madeley
Dyddiad: Dydd Mercher, 20 Medi 2017 Clerc y Pwyllgor
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Gwybodaeth ychwanegol a ofynnwyd amdani gan y Pwyllgor ar safonau proffesiynol i lywio'r Ymchwiliad ar Addysg a Dysgu Proffesiynol Athrawon

Noder bod y dogfennau a ganlyn yn ychwanegol i'r dogfennau a gyhoeddwyd yn y prif becyn ar gyfer y cyfarfod hwn

3 Ymchwiliad i Addysg a Dysgu Proffesiynol Athrawon – Sesiwn dystiolaeth 8

(10.00 – 11.00)

(Tudalennau 1 – 118)

Dogfennau atodol:

TT FI 01 Cymdeithas Athrawon a Darlithwyr (Saesneg yn unig)

TT FI 02 Cymdeithas Genedlaethol Prifathrawon Cymru (Saesneg yn unig)

TT FI 03 Undeb Cenedlaethol yr Athrawon, Cymru (Saesneg yn unig)

TT FI 04 Cyngor y Gweithlu Addysg (Saesneg yn unig)

TT FI 05 Cymdeithas Arweinwyr Ysgolion a Cholegau (Cymru) (Saesneg yn unig)

TT FI 06 Cymdeithas Genedlaethol yr Ysgolfeistri ac Undeb yr Athrawesau (Saesneg yn unig)

TT FI 06 NASUWT Atodiad A (Saesneg yn unig)

TT FI 06 NASUWT Atodiad B (Saesneg yn unig)

TT FI 06 NASUWT Atodiad C (Saesneg yn unig)

TT FI 06 NASUWT Atodiad D (Saesneg yn unig)



TT FI 06 NASUWT Atodiad E (Saesneg yn unig)

TT FI 06 NASUWT Atodiad F (Saesneg yn unig)

TT FI 07 Estyn

TT FI 08 Michael Waters (Saesneg yn unig)

TT FI 09 UCAC (Cymraeg yn unig)

TT FI 09 UCAC (Cyfieithiad Saesneg er defnydd mewnol yn unig)

TT FI 10 Consortia Gwella Ysgolion Rhanbarthol (Saesneg yn unig)

Inquiry into Teachers' Professional Learning and Education – CYPE Committee additional questions August 2017

ATL Cymru response

ATL Cymru, the education union, is an independent, registered trade union and professional association, representing teachers, head teachers, lecturers and support staff in maintained and independent nurseries, schools, sixth form, tertiary and further education colleges in Wales. AMiE is the trade union and professional association for leaders and managers in colleges and schools, and is a distinct section of ATL. We recognise the link between education policy and members' conditions of service.

Our response

ATL Cymru welcomes the opportunity to respond to the CYPE Committee Questions listed below:

- The proposed implementation timescale; will teachers across Wales have the necessary time and resources to be able to genuinely match the descriptors of the new Standards by September 2018?
- Is there, or is there likely to be, enough support and training available to help teachers transition to the new standards?

Our main concerns about the Standards remain consistent with our response to the CYPE Committee Inquiry earlier in the year. We still have concerns about:

- The Reform Agenda
- Expectations of the profession
- How standards will be used (Capability)
- Role of the Consortia
- Time and resources for training

ATL Cymru has stated that whilst we welcome many of the professional standards in principle, we would be concerned that there isn't enough in terms of time and resources to ensure the implementation of these Standards by 2018.

Reform agenda

As we stated before, the Standards are in danger of becoming lost amongst the many changes which form part of the Reform Agenda. Teachers, like all education professionals, are faced with a series of changes, which will all have an impact on teacher workload, and could therefore impact on outcomes for

children and young people, if not sufficiently resourced and implemented with a full suite of training.

The indicative list below includes some of the changes, which largely form part of the 'Reform Agenda':

- A new Curriculum for Wales
- ALN Reform
- Welsh language expectations
- Changes to tests and Qualifications
- New Estyn regime
- Digital competency framework
- Changes to categorisation

We remain concerned that without more training and resources the above changes will not be able to be implemented across and by the entire workforce.

Expectations of the Profession

The WG consultation document on Professional Standards said:

“Professional teachers earn the respect of their colleagues and the wider world by going the distance for their learners, engaging with research and developing their practice. These outlooks and activities begin on the first day of their training and continue throughout their career, whether that be as a classroom teacher or in formal roles of leadership, including headship.”

Over all, a clear commitment to CPD is required if these professional standards are to be meaningful, and these aspirations are to be fulfilled. Otherwise the profession will be faced with increased expectations at a time of great challenge.

Capability

ATL Cymru have welcomed the professional standards in principle. Yet we remain concerned that they could be misused without training for everyone – including those with line-management responsibilities – to ensure the role and status of the standards is fully understood and used correctly. We would not want them to be used as a punitive measure during capability issues. Whilst there has been some reassures this is not the intention of the Standards, without full training, there is a danger this could happen. The timescales for such training remain tight.

The role of the Consortia

ATL Cymru remain concerned that there needs to be strong oversight of the Consortia and their role in implementation of professional standards.

We note from the outcome of the National Assembly's Outreach team survey that regional consortia were not always well understood by teachers and that

the training they provide is not always relevant or affordable¹, which was considered by the Public Accounts Committee earlier this year.

Conditions of service

Since answering both the WG and the previous CYPE Committee consultations, we would seek greater clarity on the precise status of the Professional Standards. We ask for clarity in light of recent comments² from the First Minister, in answer to a question from Leader of Plaid Cymru, Leanne Wood AM, about tackling workload, pay and conditions and numbers in initial teacher training. The First Minister said:

“I think there are great opportunities for us when pay and conditions are devolved to put in place a holistic package for teachers to make sure that the responsibilities they have are reflected in terms of the pay that they receive. It has always been a strange anomaly that we have responsibility for education, but not for pay and conditions. That is at the heart of delivering a good deal for teachers, and that’s what we intend to do.

[...]

“I don’t think it would be possible to put in place the right package until pay and conditions are devolved. Why? Well, people want to know what their terms of employment are, what their conditions of employment are, what they’ll be paid, and what activities they’ll be paid for. That all impacts, clearly, on a decision to go into a profession and that impacts, ultimately, on numbers. Now, next year, we’ll have the opportunity and the responsibility of controlling teachers’ pay and conditions. We want to work with the teaching unions to make sure we put forward a package that makes teaching more attractive than perhaps it has been for some people in the past, but getting control of pay and conditions is absolutely crucial for that.”

Therefore, we would seek clarity on the status of the Professional Standards now, since WG has said they are addressing some of the issues highlighted by Leanne Wood AM?

We very much look forward to working with the First Minister to, as he states, “make sure we put forward a package that makes teaching more attractive than perhaps it has been for some people in the past”, as he has stated. We also welcome his comments, that no teacher will be any worse off than in

¹ <http://senedd.assembly.wales/documents/s61358/Survey%20results.pdf>

² <http://www.assembly.wales/en/bus-home/pages/rop.aspx?meetingid=4300&language=en&assembly=5&c=Record%20of%20Proceedings> FMQs, 26/6/17. In answer to questions from Plaid Cymru Leader, Leanne Wood AM

England, and look forward to reading proposals as to how this will be achieved.³

Conclusions

With these points in mind we remain concerned that access to CPD for the education workforce will remain limited, and that the professional standards increase expectations on the workforce at a time of great pressure, without providing funded opportunities for learning which are needed.

Our full response to the WG consultation on Professional Standards for teachers can be found here:

<https://www.atl.org.uk/sites/www.atl.org.uk/files/ATL%20Cymru%20response%20to%20professional%20teacher%20standards%20consultation.pdf>

We note that our response to your earlier consultation on Teachers' Professional Learning can be found here:

<https://www.atl.org.uk/sites/www.atl.org.uk/files/ATL-Cymru-Professional-learning-and-education-CYPE.pdf>

Contact: Mary van den Heuvel, Policy Advisor, ATL Cymru:
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³ <https://www.atl.org.uk/latest/future-teachers%E2%80%99-pay-wales>

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Bellach | Inquiry into Teachers' Professional Learning and Education –
Further Information

TT FI 02

Ymateb gan: Cymdeithas Genedlaethol Prifathrawon Cymru
Response from: National Association of Head Teachers Cymru (NAHT)

**NAHT welcomes the opportunity to submit evidence to the
Children, Young People and Education committee.**

**NAHT represents more than 29,000 school leaders in early years,
primary, secondary and special schools, making us the largest
association for school leaders in the UK.**

**We represent, advise and train school leaders in Wales, England
and Northern Ireland. We use our voice at the highest levels of
government to influence policy for the benefit of leaders and
learners everywhere.**

**Our new section, NAHT Edge, supports, develops and represents
middle leaders in schools.**

The invitation to submit additional evidence to the National Assembly
for Wales' Children, Young People and Education Committee
concerning the inquiry on **Teachers' Professional Learning and
Education**.

As requested, NAHT Cymru will focus specifically on the additional
evidence concerning:

- The proposed implementation timescale; will teachers across Wales have the necessary time and resources to be able to genuinely match the descriptors of the new Standards by September 2018?
- Is there, or is there likely to be, enough support and training available to help teachers transition to the new standards?

**The proposed implementation timescale; will teachers across
Wales have the necessary time and resources to be able to
genuinely match the descriptors of the new Standards by
September 2018?**

1. In our submission to the consultation on the new professional standards, NAHT Cymru noted that the overall vision for the new standards appeared to contain the right elements to support the development of professional teachers. We cited the work of Coe et al. ([What makes great teaching?](#)) (2014) which emphasises similar and

related areas (such as pedagogy, professional learning) – areas which we feel have been neglected in recent years.

2. In our submission, we also suggested that it would be the roll out and delivery of the standards that would prove critical. We will explore these related issues further in this evidence submission.
3. At the outset, it is important to note a degree of concern with the wording used by the Children, Young People and Education Committee in the focus on the proposed implementation timescale. To question whether ‘teachers across Wales have the necessary time and resources ***to be able to genuinely match the descriptors of the new Standards by September 2018?***’ suggests that by that date, existing teachers must have met all the standards, and this view does not resonate with our understanding of the intended functioning and use of the new standards.
4. NAHT Cymru understands that the new standards are intended to support further and ongoing professional learning throughout an individual’s teaching career. In bringing in the new standards, each individual would initially be able to use them as a baseline from which to identify and then undertake training focusing on individual, specific areas for development. The EWC Professional Learning Passport, for example, might be then used as an incrementally developing record of ongoing professional learning. The wording of this specific inquiry gives an impression that all existing teachers need to evidence that they have met all the standards by the date of their implementation – we believe that this is neither accurate nor desirable when aiming to encourage lifelong learning in the teaching and school leadership community.
5. One of the fundamental challenges facing professional learning for teachers in Wales, and indeed the wider scale of reform currently under way, has been the systematic reduction in the focus upon individual teacher development need as a result of continuous large-scale, sometimes poorly joined up, reforms.
6. NAHT Cymru believes many of the current reforms have potential to be excellent, but it is critical that we learn lessons from some of Wales’ previous good policy plans that have been implemented too quickly, without adequate resource or the necessary foundations being in place.
7. As a result of historical, large-scale, poorly co-ordinated reform as well as the funding challenges facing schools, there has been a pattern of sporadic continuous professional learning for staff, a loss of adequate training resources and a number of unintended consequences through external accountability.

8. In 2017, school leaders in Wales continue to face a level of education reform not seen in the Principality for well over 70 years.
9. Almost every major policy area impacting upon schools is affected, including:
 - Curriculum and assessment (Professor Graham Donaldson's 'Successful Futures');
 - New Wales-based qualifications - GCSE and A-levels;
 - Accountability changes – New Estyn Inspection framework and the welcome announcement for proposed changes to school performance measures;
 - Changes to Initial Teacher Education (Professor John Furlong's 'Teaching Tomorrow's Teachers');
 - Professional Learning – including establishing new National Academy for Educational Leadership;
 - Developing new professional teaching standards;
 - Devolution of Teachers' Pay and Conditions;
 - Additional Learning Needs and Education Tribunal (Wales) Bill – ALNET Bill.
10. It is no surprise, therefore, that the results of the recent EWC workforce survey suggested that almost 90% of teachers felt their workload was unmanageable.
11. In relation to the above, it should also be noted that the Devolution of Teachers' Pay and Conditions to Wales could place unnecessary pressure upon the implementation timetable for the new professional standards. However, we would urge caution, as a rushed implementation timetable could result in a loss of faith in the new standards before they have had an opportunity to fulfil their core purpose – raising further the quality of teaching and leadership in schools.
12. The reality for many schools, often the settings which would benefit most from consistent and intensive staff professional learning, is that external accountability causes too great a focus on specific, crude and generic pupil outcomes. The result can be a school which is encouraged to concentrate on short-term 'initiatives' in order to garner 'quick-wins' whilst neglecting potential fundamental issues within teaching and leadership. This can also reduce the available resource, funding, time and effort that could be potentially allocated to more constructive, sustainable and impactful professional learning for staff.
13. It also should be noted that the new standards should be used for career-long development, not as a tick list to work through and not as a punitive mechanism. Such a fundamental message cannot be left

until after their implementation and, therefore, pre-implementation messaging and the time to ensure all understand this is critical.

Is there, or is there likely to be, enough support and training available to help teachers transition to the new standards?

14. As already touched upon earlier in our evidence, the scale of reform in Wales is very significant. As a result, and with the timetable for implementing a number of major policies already under way, the capacity of the existing system is under pressure and current pathways for training delivery are likely to have reduced space for anything additional.
15. The requirements of the new curriculum and the ALNET Bill provide two clear examples. Neither can be put aside for a period of time and both have huge school-based training implications prior to their formal launch.
16. There is evidence to suggest schools, other settings and individual teachers / school leaders across Wales have experienced varying levels of training and information related to the two above, significant reforms. The regional consortia fulfil a crucial role in delivering information and training, particularly related to national reforms, but their resources too are under pressure.
17. For the new standards to be embedded effectively, a basic understanding of their functioning and operation is required prior to implementation and launch. This would require consistent national messaging for all those who would undertake delivery of this training – for example, challenge advisers, local authority officers, key Welsh government officials and Estyn – and then a subsequent process for delivering this common national message to all relevant school-based staff. It would need to be clear to schools, governing bodies and particularly school leaders, how the new standards assist the raft of reforms and are not in addition to them.
18. The challenge for the new professional standards, therefore, will be to achieve the desired impact as expressed within the principles and purposes, particularly in terms of professional learning, without further compromising an already overburdened workload.
19. It is unclear how Estyn might view the standards, or how reporting of a schools overall performance management against the standards might inform the judgements that Estyn make.
20. It is unclear whether a programme of funded engagement and training will be provided to support the new standards. NAHT Cymru is of the view that such a programme is vital for all teachers, accompanied by

training and evaluation for middle and senior leaders. Head teachers will require oversight of the new system within their school and opportunities to collaborate with others as the new system embeds.

21. As noted, measurement against the new standards is a refined process, not a matter of making 'perfunctory' judgements against a checklist. This implies a considerable responsibility for both teachers and managers in evaluating and reviewing an individual's practice, determining success, and identifying appropriate professional development opportunities for each individual. It's unclear what the workload implications of the system will be, but it may be assumed that there will be a need for a minimum number of opportunities for an individual and the line manager to meet over an annual cycle, with time required to both prepare for, and to summarise and record the outcomes of such meetings. NAHT Cymru is unclear as to how Welsh government intend to support these activities without adding further to existing workloads.
22. The use of mentoring is, of course, desirable. However, the availability of mentors and the workload implications are also unclear. NAHT Cymru wishes to be reassured that there is sufficient new funding to provide the capacity required for these essential activities.
23. A recurrent theme in our consultation response to the new standards was the need for the ambition of the new standards, and their commendably developmental approach, to be underpinned by real opportunities for training and development that have a tangible effect on, and are valued by, teachers and leaders. It is also critical that the operation of the new standards does not lead to any increase in workload for either senior leaders or their staff. Properly implemented and underpinned by effective, individual professional development, the standards have the potential to increase the opportunities for collaboration, reflection and evaluation that will, in turn, drive recruitment, improve retention and lead to system wide benefits for pupils. However, this will not be the case if the implementation of the new standards creates bureaucratic burden, and drives further increases in workload for an already frazzled workforce.
24. Currently far too few teachers have access to professional learning and development that meets their needs. If the approach to the new standards is to bear fruit, it must be underpinned by significant new funding, such that every teacher and leader is able to achieve their entitlement to the type of CPD that meets their individual needs. Clarification of the new funded commitment (originally cited in New Deal) from Welsh government is required to provide for teachers' professional development needs, and this must be delivered without an increase in workload.

25. As already cited, the most recent National Education Workforce Survey for Wales paints a bleak picture.

- 57.9% of school teachers indicated they had not used the existing 'Practising Teacher' standards or leadership standards in setting objectives, planning development or reviewing performance in the last 12 months.
- Cost was one of the main barriers/obstacles preventing respondents from accessing professional development.
- 13.9% of school teachers, felt that their development needs had not been met at all in the last 12 months.
- Full-time school teachers revealed that they regularly work an average of 50.7 hours during an average working week.

26. To have credibility and achieve engagement, the implantation of new standards must deal with these issues. Unless they can be addressed in the transition to the new standards, there is a risk of their failure even before they are implemented fully.

26. NAHT Cymru does not regard the timescale for implementation as manageable or realistic.

27. In order to provide the 'backdrop' to performance management conversations, senior and middle leaders and teachers need to be familiar with, understand and able to confidently operate the new teacher standards. Full sight of the standards and training is needed in advance of their introduction, and well in advance of them being used to focus and direct the content of performance management conversations. Given the complexity of the new system, time will be required for senior leaders and teachers to understand it and to operate it. A rushed implementation will compromise both the integrity of the standards and the credibility they will subsequently hold with the profession.

28. Clearly an implementation date of September 2017 is too soon, given that Welsh government did respond to the consultation until May 2017. NAHT Cymru are opposed to the proposed phased implementation; in our view this is a recipe for confusion that has the potential to substantially undermine the new system at its birth. Trying to operate a parallel system for NQTs, while maintaining existing systems for some staff, and perhaps making provision for those staff that might choose to opt-in to the new standards, will place unnecessary pressure and additional workload on school leaders. The potential for this hybrid system to confuse and complicate existing competency or disciplinary measures is also significant.

29. A timetable that would allow schools less than two months to prepare for such major changes is both unreasonable and unworkable; furthermore it shows scant regard for the workload and well-being of senior and middle leaders who will be charged with making the new standards work. Matters would be further complicated by the need for schools to undertake performance management activities during September and October to inform decisions about pay.
30. NAHT Cymru's strong view is that the new funding is required to support the arrangements. The success of the implementation of the new standards and the realisation of their aims is dependent on there being sufficient funding: for example, to support high quality, individually tailored CPD; to deliver opportunities for meaningful collaboration time within schools and across the wider system; and to provide the resources required to facilitate innovation. Within schools there will be a need to provide for more time for colleagues to meet and collaborate. Delivery of the vision will not happen without clearly signalling to teachers and senior leaders that it will be properly resourced – the proposals will founder if leaders and teachers are unsupported and under-resourced.
31. NAHT Cymru points to the existing lack of resource in the system. Current funding pressures are placing increasing strain on CPD budgets.
32. School leaders are concerned that their school Education Improvement Grants are woefully inadequate and many are being pressurised further in order to maintain staffing levels against the backdrop of school budget challenges.
33. There appears to be a general consensus that the quality of teaching and leadership is the key to a successful education system. If Wales is truly committed to investing in developing the best teaching and leadership required for our children and young people, it must be accepted that the current levels of resource in the system cannot achieve that admirable aim at present.

NAHT Cymru - September 2017

Cynulliad Cenedlaethol Cymru | National Assembly for Wales

Y Pwyllgor Plant, Pobl Ifanc ac Addysg | Children, Young People and Education Committee

Ymchwiliad i Addysg a Dysgu Proffesiynol Athrawon | Inquiry into Teachers' Professional Learning and Education

TT FI 03

Ymateb gan: Undeb Cenedlaethol yr Athrawon, Cymru

Response from: National Union of Teachers Cymru (NUT Cymru)

About NUT Cymru:

NUT Cymru represents primary and secondary school members and is the largest teaching union in Wales. We welcome the opportunity to contribute evidence to the Children, Young People and Education Committee's Inquiry into Teachers' Professional Learning and Education.

Areas for consideration:

General views on the standards:

There is little opposition to the vision of having an education sector which places the child at the centre of its work. There is also no opposition to the notion of practitioners constantly striving to develop and grow. This has always been the case. The failure in the past has been an inability to match that vision to action. We certainly continue to support the notion of aligning professional standards, and all other education policies, towards delivering on this vision.

We agree that the principles and purposes of the standards that were set forward in the original consultation, taken individually, are appropriate to the new education agenda in Wales. The one concern is that many of these principles and purposes are quite vague in their descriptions which make it somewhat difficult to reflect in specific tasks. Alternatively, it is a case that they are catch all terms and so they can be fulfilled quite simply and therefore do not necessarily have a tangible outcome for teachers or pupils.

The values, dispositions, dimensions and their elements are all appropriate. A complete different set could also be designed and again be found to be appropriate. It is hard to argue that areas such as collaboration, pedagogy and professional learning are not central to professional standards. However what has been produced is an over complex and cumbersome set of standards. Schools and teachers will not be able to utilise these standards as a way of informing their work beyond a tick box exercise for career progression and performance management, and indeed the fear is it will be misused in those regards.

We estimate that the slides that formed the consultation and standards comprise 75 standards for teachers (comprising 6 Values and Dispositions and 5 Dimensions which are sub-divided into 32 elements, each with 2 Descriptors) and 79 standards for leadership (comprising 6 Values and Dispositions and 5 Dimensions which are sub-divided into 34 Elements, each with 2 Descriptors). On several occasions NUT Cymru has requested clarity from the Welsh Government in the form of a clear, concise and coherent set of standards. That, unfortunately, has not been forthcoming.

We did welcome the clarity that standards should not be the sole requirement for performance management and this will, in part, help mitigate some of the concern about capturing each and every element at all times. That they are not supposed to act as a checklist will be a positive thing.

However, we are aware that since the consultation on standards the Welsh Government has reflected on the way in which the standards were presented. We would hope that there is still scope, post September but prior to these standards becoming statutory, for discussion between the Welsh Government and teaching unions to take place that can find a better balance. Ideally we would like to reach a point where the number of standards are dramatically reduced, thus making them more useful as a tool within schools, but accepting the underlying descriptors and dimensions remain as a way of showing progression within those standards. This model was supposed to be simpler and clearer than the previous one which we know from the EWC workforce survey showed that 57.9% of teachers didn't use. Unless there are changes we do not believe the percentage will improve.

The proposed implementation timescale:

In terms of asking teachers to switch to the new standards over the course of 2017, when they are introduced but not statutory, this seems highly unlikely. Without a clear list of standards that will apply we cannot agree that the timescales for implementation are realistic. Further, even if that were the case, we calculate that post consultation there will only be 35 working days available for schools to receive, digest and plan said implementation. That is much too short a time period.

All of the descriptors and dimensions would need underpinning with explanatory guidance/exemplification for there to be any hope of them being successfully implemented. The Welsh Government needs to clearly demonstrate what this actually means and looks like in practice. With the current number of descriptors, this is a significant task which will take a

significant amount of time to compile and so calls the timescales for a successful introduction of the Standards further into question.

Should there be negotiation and development of the standards, both in their content and presentation, then there is a possibility that by September 2018 we could reach a point where implementation is possible. In theory this should result in standards which are less onerous on teachers and school leaders and which individuals will want to engage with for their professional development. However, if the standards remain in their current format and with the current list of expectations then not only will the timescales prove unrealistic but the value of the standards themselves will be questionable.

Support and training:

It may not be a case that teachers, as a general point, need support and training to transition to the new standards. However if we are to ensure that teaching standards are as high as we would like to ensure then it is important to look at the quality, funding and availability for teachers to access continued professional development to meet both current and existing standards. CPD remains a huge failing in Wales which is consistently undermining the ability of teachers to gain new skills and improve on the high quality expertise they already have. We have heard positive soundbites from a number of successive Education Ministers about the importance of professional development and recognition of the Welsh Government's failure to address this in the past but we do not appear much further along in terms of practical and tangible action.

There may very well need to be some training around the specific transition of the new standards, but again this will be determined more by the exact nature of the standards that are ultimately implemented in 2018 and how schools feel they can, or as is the case at present, cannot utilise them. There is no use in having a set of aspirational standards that calls for career long professional growth unless there is funding to provide quality assured professional learning opportunities to support and enable teachers to attain these aspirational levels. Teachers cannot be held responsible without a guarantee of such an entitlement.

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Bellach | Inquiry into Teachers' Professional Learning and Education –
Further Information

TT FI 04

Ymateb gan: Cyngor y Gweithlu Addysg

Response from: Education Workforce Council

The Council is pleased to provide a response to each of your questions below. We also attach copies of our responses to the Welsh Government consultations on professional standards for “teaching and leadership” and “further education teachers and work based learning practitioners” to assist you.

(A) General comments

The Council welcomed the Welsh Government’s review and refresh of the professional standards for teachers as it was both long overdue and timely given the implementation of a number of key policy initiatives in Wales such as “Successful Futures”, “Teaching Tomorrow’s Teachers” and the “aspiration of achieving one million Welsh speakers by 2050”. Officers from the EWC assisted the Welsh Government, by being involved in working groups and events to develop and shape the revised standards.

We welcome the organisation of the standards into five sections and are pleased to see the emphasis on developing professionals beyond the attainment of the Practising Teacher standard (Induction).

In our consultation response, we did raise a number of practical suggestions which we felt would improve the standards and also some broader matters related to the EWC’s statutory remit. The Committee may read these in the annexed consultation responses.

(B) The proposed implementation timescale, will teachers across Wales have the necessary time and resources to be able to genuinely match the descriptors of the new Standards by September 2018

Newly qualified teachers commencing Induction from September 2017 are to be assessed against the new standards. This will put pressure on all parties (consortia, local authorities, schools, external verifiers and newly qualified teachers) to be up to speed with the standards very quickly, given that they are not expected to be available in their final form until the end of August 2017.

September 2018 for teachers not undertaking Induction is a more realistic timescale, however, the Council highlights to the Committee some specific points it invited the Welsh Government to consider in its consultation response, in particular:

- Findings from the recent national workforce survey highlighted that teachers are “time poor” and that the current standards are not sufficiently engaged with by teachers.
- The revised standards are “conceptually” very different from the current standards and also require analysis / deciphering in places.

Teachers will need time, support and resources to get to grips with the new standards, while continuing to use the existing standards in the interim. It is also the case that teachers will need to engage with the standards in different ways during initial teacher training / Induction and during the rest of their career. It is important that teachers are supported to do this.

(C) Is there, or is there likely to be, enough support and training available to help teachers transition to the new standards?

As stated above, Council considers that teachers will need high quality exemplification, support and training to help them make the transition to the new standards. The Council awaits details of Welsh Government plans in this respect.

As a standards body, the EWC has a good knowledge of the exemplification, support and training available in other countries and professions. We particularly highlight Australia, Scotland, New Zealand and Ontario as examples of having high quality support and exemplification of their standards for teachers (further details from their respective websites).

The collation and development of high quality materials and subsequent presentation to teachers is likely to take a considerable amount of time and should not be underestimated. It would have been preferable for this to be available at the same time as publication of the new standards.

(D) Whether you envision any additional resource pressures on your work as a result of the new standards?

EWC statutory fitness to practise role

In its consultation response, Council observed 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 approach is taken internationally so that the standards remain applicable to:

- Current registrants in maintaining their fitness to practise.
- Prospective registrants who have not yet started practising and are applying for registration for the first time.
- “Service users”, parents, guardians and the general public.

Because of the different approach to the standards taken by the Welsh Government, the Council feels it necessary to point out that the new standards will hamper rather than help us in our **statutory fitness to practise work** which involves assessing areas of practitioner competence. The consultation document referred to ‘capability or competency procedures’ (page 12) but we would like to reiterate that in their current form, the standards are not suitable to be readily used for this purpose. **The Council’s fitness to practise role is a considerable responsibility. We are required to perform this function in the interests of learners, parents, guardians and the general public and its decisions impact on the careers of the teachers it considers.**

Council notes that the Welsh Government chose to **remove the EWC Code of Professional Conduct and Practice from the standards.** Removing the Code from the standards is a retrograde step with no clear rationale.

Ownership of the standards by the profession

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).

Given the moves to devolve teachers' pay, terms and conditions, we think that the appropriateness of the Welsh Government (that is the body determining pay and conditions) also being the body responsible for establishing and 'owning' teachers' professional standards needs to be considered.

A joined-up approach

Under the Education (Wales) Act 2014 and related legislation, seven groups of practitioners are now registered with the EWC (school and FE teachers, school and FE learning support workers, youth / youth support workers and work based learning practitioners). The Welsh government is to be commended for creating the most extensive register of education and training professionals in the world and this is a model that is now being considered in other countries (for example Scotland has announced an intention to consult on a similar model).

The Council notes that the standards for school teachers, FE / work based learning and learning support staff are being developed separately. We feel that this is a missed opportunity to highlight a shared vision and the core knowledge and practice common across educational sectors and settings. Including the EWC Code in all standards would have been one small step in this direction. While recognising that professional practice across sectors and roles is different, we look for standards which recognise, express and enable the professional practice(s) required to deliver new curriculum reform, as well as other Welsh Government reforms which impact school and post 16 / compulsory sectors, such as the Additional Learning Needs agenda and Welsh language strategy.

New professional standards for further education teachers and work-based learning practitioners

Survey response form

Responses should be returned by 20 July 2017 to:

Claire Jones
Professional Frameworks and Standards Team
Curriculum Division
The Education Directorate
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and sent to:

e-mail: Safonau.FEWBL.Standards@wales.gsi.gov.uk

Name	Hayden Llewellyn
Organisation	Education Workforce Council (EWC)

Please select your job role

- Further education practitioner
- Work-based learning practitioner
- Further education manager
- Work-based learning manager
- Other (please specify).

Aims, principles and model

Question 1 – Do you agree that the aims and the key principles on which the standards have been developed are appropriate as a basis for developing these new professional standards?

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

We think the aims and principles are sound, however, we are not convinced that the standards as proposed are sufficiently aligned with the principles to be able to achieve the aims.

Question 2 – Do you agree with the statement that a particular blend of values, skills and knowledge taken together define professionalism in action and high-quality learning?

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

Yes we agree and would add that similar taxonomies are the norm and commonly used internationally in developing professional standards for education professionals, for example in Scotland and several states in Australia.

This model does provide clarity, however it is curious why the standards have not been organised under the headings; 'values, skills, knowledge.'

Question 3 – Do you agree that the values, skills and knowledge capture the appropriate requirements for sustained highly effective teaching?

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

While we commend the attempts made to produce a clear and concise document, there is a danger that the proposed standards will seem

'basic' and reductive. In places they read like a 'job description' rather than standards which will not provide sufficient stretch nor encourage development for experienced professionals beyond their initial years in post.

Question 4 – Do you agree that the personal commitment statement and descriptors for further education (FE) teachers/work-based learning (WBL) practitioners will support them 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"/>
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Supporting comments

The Council agrees that the personal commitment statement and descriptors will provide a helpful framework for practitioners to take responsibility for career long professional learning, however it considers that the absence of "leadership" within the standards is a notable omission in this regard.

Question 5 – What are your views on how well the new standards will support you to reflect on your practice and to plan your professional learning?

Comments

N/A

Organisation/employer

Question 6 – What are your views on how well the new standards will support your organisation to engage your staff to reflect on their practice and to develop their and your own organisation's professional learning?

Comments

The Council is answering questions 5 and 6 from the perspective of its registrants.

As a professional body, the EWC believes that all practitioners must have the appropriate knowledge, skills and experience to maintain their registration. The new standards offer a useful framework to aid practitioners in this regard, however it must be recognised that the standards will not achieve this objective

on their own.

The Council is working with Welsh Government officials to incorporate the new standards within the Professional Learning Passport. This is an important step as the Passport is a tool intended for use by practitioners in planning, recording and reflecting on their professional learning. The Council would urge the Welsh Government to fully utilise the benefits of the Passport in launching the new standards and encouraging practitioners to 'plan, record and reflect' against them.

Question 7 - 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?

Comments

The Council notes the references to Welsh language and culture within the standards. This is clearly needed. The Council also highlights the part that FE and WBL will need to play in ensuring the Welsh Government reaches its target for 2050 of 1 million Welsh speakers.

Question 8 - Please also explain how you believe the proposed new professional 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.

Comments

See response to question 7.

Question 9 – 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.

The Council welcomes the review and development of standards for FE teachers and WBL and considers this to be long overdue given the:

- new focus on the sector in the delivery of Welsh Government reforms
- introduction of registration and professional regulation to the FE and WBL sectors

We commend the Welsh Government for the clear and concise way in which the standards have been prepared and hope that they will contribute to greater parity of esteem between the school and FE / WBL sectors.

While welcoming this development, we invite the Welsh Government to consider the following points:

1. As a standards body with a legislative remit that explicitly emphasises that 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). This would, in theory, be easy to accomplish as standards in FE and WBL do not have a statutory basis in Wales.

The current position whereby the EWC is required to regulate against sets of professional standards it does not own or develop is highly irregular internationally.

2. We think the proposed standards as currently expressed do create some difficulties for the EWC in undertaking our fitness to practise work, which involves assessing areas of practitioner

conduct and competence.

The Council notes that there is no reference to the use of the standards for regulatory purposes in the aims listed on page 5 of the consultation document.

We also consider that a specific reference to the Council's Code of Professional Conduct and Practice should be included within the standards, thus making it clear that there is an expectation on registrants to adhere to the Code.

3. The Council notes that the standards for school teachers, FE / WBL and learning support staff are being developed separately. We feel that this is a missed opportunity to highlight a shared vision and the core knowledge and practice common across educational sectors and settings. Including the EWC Code in all standards would have been one small step in this direction. While recognising that professional practice across sectors and roles is different, we would look for standards which recognise, express and enable the professional practice(s) required to deliver new curriculum reform, as well as other Welsh Government reforms which impact school and post 16 / compulsory sectors, such as the Additional Learning Needs agenda and Welsh language strategy.

We also are aware that the standards for school teaching and leadership are conceptually very different to the FE and WBL standards and have been prepared in a way that is out of kilter with both the FE and WBL standards and other standards models internationally.

4. The Council considers that a small number of refinements to the structure of the standards ought to be considered. For example:
 - why are the standards introduced as “standards **and** personal commitments”?
 - the use of a ‘root’ plus statements, although clear, also restricts what the statements can express;
 - are all the standards of equal importance?
 - what is the relationship between the bulleted statements and the statements underneath?
 - some standards are broad while others are prescriptive, for example ‘other appropriate professional skills’, compared with ‘contributing to professional learning networks’
 - in places, the standards as presented seem repetitive, and the wording clumsy. For example, how can a practitioner demonstrate dignity towards others? It would also be difficult to ‘critically reflect on one’s own values and

practice to improving (sic) learning:'

5. We query the omission of the following specific matters in the standards:

- leadership
- safeguarding

6. The standards will require accompanying guidance and exemplification if they are to be used effectively by practitioners and employers. We trust the Welsh Government has this intention?

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"/>
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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"/>
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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"/>
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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"/>
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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"/>
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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"/>
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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"/>
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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"/>
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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"/>
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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:

- iii) opportunities for people to use Welsh
- iv) 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:

- iii) 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
- iv) 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:

Cynulliad Cenedlaethol Cymru | National Assembly for Wales

Y Pwyllgor Plant, Pobl Ifanc ac Addysg | Children, Young People and Education Committee

Ymchwiliad i Addysg a Dysgu Proffesiynol Athrawon – Gwybodaeth Bellach | Inquiry into Teachers' Professional Learning and Education – Further Information

TT FI 05

Ymateb gan: Cymdeithas Arweinwyr Ysgolion a Cholegau (Cymru)

Response from: Association of School and College Leaders (Cymru)

1. The Association of School and College Leaders (ASCL) represents over 18,000 heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of maintained and independent schools and colleges throughout the UK. ASCL Cymru represents school leaders in more than 90 per cent of the secondary schools in Wales.
2. The timescale for the introduction of the new Professional Standards is, at least superficially, reasonable. However, this is set against a background of schools having to cope with a period of transition and unprecedented change to curriculum and assessment reform. If this was the only major change that was being expected of schools, we would have no problem with the timescale. However, despite our enthusiasm for and support of the new standards, we are not confident that the timescales can be achieved without some degree of support.
3. As far as we are aware, no provision has been made by the Welsh Government for staff training for the implementation of these standards. We would suggest that it would be reasonable to provide schools with some additional staff-training time and a degree of financial support. With the plethora of other changes happening at the moment, we fear that otherwise this may not be seen as a priority by schools, and as a result given less than the amount of time and attention it needs to be effective.
4. We are concerned that, with both the proposed timescale and lack of central training provision, unless time and resources are given to schools, these important reforms will end up being a “damp squib”. If they are to have the impact which they ought, then they will need to be given sufficient time and resources so that all teachers and school leaders are able to make sense of them properly and then use them effectively.

Conclusion

5. I hope that this gives you a clear perspective of our views of this important matter. ASCL Cymru would be happy to contribute to further discussions.

Cynulliad Cenedlaethol Cymru | National Assembly for Wales

Y Pwyllgor Plant, Pobl Ifanc ac Addysg | Children, Young People and Education Committee

Ymchwiliad i Addysg a Dysgu Proffesiynol Athrawon – Gwybodaeth Bellach | Inquiry into Teachers' Professional Learning and Education – Further Information

TT FI 06

Ymateb gan: Cymdeithas Genedlaethol yr Ysgolfeistri ac Undeb yr Athrawesau

Response from: National Association of Schoolmasters Union of Women Teachers (NASUWT)

1. The NASUWT welcomes the opportunity to submit written evidence to the Children, Young People and Education Committee (CYPEC) Inquiry into Teachers' Professional Learning and Education (the second Inquiry).
2. The NASUWT is the largest teachers' union in Wales representing exclusively teachers and school leaders.

GENERAL COMMENTS

3. The NASUWT notes that the particular purpose of the second Inquiry is to consider:
 - (i) the proposed implementation timescale for the new professional standards for teaching and leadership (the draft school standards);
 - (ii) whether teachers across Wales will have the necessary time and resources to be able to genuinely match the descriptors of the new standards by September 2018;
 - (iii) if there is, or if there is likely to be, enough support and training available to help teachers transition to the draft school standards.
4. Whilst the Union finds no difficulty in presenting written evidence on these issues, the CYPEC is asked to note from the outset that the submission of this evidence should not be viewed as an acceptance of the draft school standards.
5. Indeed, the CYPEC is asked to consider this evidence in the context of the responses submitted to the consultations on the draft school standards and on the new professional standards for further education (FE) teachers and work-based learning practitioners (the draft FE standards) (Appendix A and B, respectively).

6. The NASUWT has referred to the new professional standards as 'draft' school standards, because it was expected that post-consultation discussions with the Education Directorate, which commenced at a meeting on 22 June 2017, following the publication of the summary of the responses to the consultation (the summary of responses), would continue through July and August.
7. Following the meeting on 22 June, the Union sent an email on 30 June to the Education Directorate (the 30 June email) in which the issues that had been discussed, the position reached at the end of the meeting and the matters which warranted further discussion, were set out.
8. The NASUWT received an out-of-office reply indicating that the correspondence would be attended to at the beginning of July. However, in the absence of a response, and following the publication of the July Dysg eNewsletter (Issue 503) (Dysg 503) in which it was suggested that the standards had been finalised, a follow-up email was sent. This email solicited a response which indicated that the lead representative of the Education Directorate no longer worked for the Welsh Government.
9. Although a meeting has now been arranged for 26 September as, apparently, this was the earliest date that could be offered by the Education Directorate, it has been suggested that the meeting will be *'...part of the ongoing engagement with stakeholders to implement the new standards. This will give us the opportunity to discuss the development of support materials for the standards, and the concerns you raise at the end of your email'*.
10. The NASUWT responded by placing on record that members, other than newly qualified teachers on induction, will be advised not to move to the new standards until September 2018, when they become mandatory, as the concerns about the new standards have not been allayed.
11. The NASUWT invites the CYPEC to consider its inquiry in the context of the issues, concerns and outstanding matters set out in the 30 June email, and the advice that will be issued to our members (Appendix C and D respectively).
12. The CYPEC should also be aware that the NASUWT has written to both the Westminster Secretary of State for Education and the Cabinet Secretary for Education in Wales to challenge the removal of the Practising Teacher Standards (PTS) from the 2017 School Teachers' Pay and Conditions Document (STPCD), as the draft school standards will not become mandatory until September 2018 (Appendix E and F, respectively).

13. It may be of interest to the CYPEC to note that the majority of the newly qualified teachers (NQTs) who attended an NASUWT New Teacher Seminar in Cardiff this summer were aware that new end of induction standards were being introduced from 1 September but only some had seen the PowerPoint presentation. Despite this, there was a confidence expressed that their initial teacher training (ITT) course will have equipped them to meet the new standards. However, it was clear that the failure to publish the end of induction standards in a coherent and transparent form was a matter of some concern.
14. The NASUWT maintains that these concerns are not without foundation as the slide show that became accessible through the Dysg 503 is prefaced with a note which indicates that the '*...slide pack is presented as a temporary measure whilst an improved format is developed following comments received during the consultation...*' with the new format being '*...available by 1 September 2017*'.
15. Whilst the new format is, hopefully, to be welcomed, it is long overdue. Further, the suggestion on the face of the slide pack that the concerns about the format arose during the consultation process is entirely disingenuous, as the NASUWT had been clear that the slide show approach was fundamentally misplaced and misguided long before the formal consultation process commenced.

SPECIFIC COMMENTS

16. The NASUWT offers the comments and observations which follow on the specific issues identified for scrutiny by the CYPEC.

The proposed implementation timescale for the draft school standards

17. The NASUWT maintains that the timescales, as laid out in the consultation document, would have been easily achievable if far less time had been spent on the construction of a set of standards that are overly complex and irreconcilable with the provision of the STPCD.
18. Regrettably, it appears that, either intentionally or unwittingly, the architects of the standards have created a set of standards that present an accountability framework that could be used as pay standards for teaching and learning responsibility payments, pay progression along the main pay range and/or movement to and along the upper pay range.

19. It is accepted that for NQTs the qualified teacher status (QTS) and the end of induction standards are standards against which they will be judged. However, if faith is placed in the confidence of those NQTs who attended the NASUWT seminar, then their enthusiasm should carry them through as they will have known no other standards. However, the NASUWT would not have the same confidence in the regional consortia that has been charged with the responsibility of providing the external mentoring for the NQTs, as it appears that there is an intention to rely on the school mentors rather than employ dedicated staff to undertake this work.
20. As for the generality of existing teachers, the NASUWT would doubt that many will have ventured into the labyrinthine slide show presentation and, when they do so, they will despair that so much time has been spent on attempting to analyse what they already do as consummate professionals on a daily basis. Indeed, the NASUWT expects fully the new standards to be received as patronising and demeaning by experienced teachers and open to abuse by those senior leaders who favour 'command and control' management.
21. Despite the actions taken by the Welsh and Westminster Government over the 2017 STPCD, referred to previously in this evidence, the NASUWT is clear that the draft school standards will not become mandatory before 1 September 2018 and has advised members against moving away from the PTS during the current performance management (PM) cycle which covers the academic year 2017/18 (Appendix D).
22. Consequently, on the understanding that the PTS will continue to apply to teachers until 1 September 2018 and without prejudice to the Union's rejection of the new standards, the NASUWT considers the timescale for the mandatory application of the draft school standards to be reasonable.

The sufficiency of the time and resources available to teachers across Wales to be able to genuinely match the descriptors of the new standards by September 2018

23. The NASUWT maintains that this aspect of the second Inquiry serves to confirm the Union's view that the new standards present an accountability framework which will be viewed and used as a management tool by which post-induction teachers will be assessed in terms of pay progression, as it suggests that teachers will be expected to match the descriptors.

24. However, the CYPEC should be aware that during the development of the standards, in answer to questions raised by the NASUWT, it was stressed that this is not the purpose of the standards post-induction as it will be assumed that the generality of teachers will be 'matching' the descriptors routinely in their day-to-day work and that the descriptors relating to '*towards sustained highly effective practice*' merely presented a 'pick and mix' menu from which teachers can choose to enhance their own professional development (Appendix C, point 3).
25. If this approach is taken at face value and 'policed' effectively, and without prejudice to the Union's rejection of the new standards, then the NASUWT believes that teachers should be able to transfer to the new standards for the 2018/19 PM cycle.

The adequacy of the support and training available to help teachers transition to the draft school standards

26. Without prejudice to the Union's rejection of the new standards, the NASUWT maintains that if the approach referred to in paragraph 24 of this evidence is applied to the new standards, then teachers should have no difficulty in transferring to the draft school standards for the 2018/19 PM cycle.
27. However, the NASUWT maintains that, as referred to in the 30 June email, particularly but not exclusively, at points 5 and 6, there will be a need for the Welsh Government, following consultation with the NASUWT and other unions, to issue clear and unequivocal guidance on the purpose and use of the standards and for the Welsh Government to play a key role in 'policing' the application standards (Appendix C).
28. The NASUWT maintains that consideration should be given by the CYPEC to the support and training that will be required to be provided by the Welsh Government to ensure that the issues identified by the NASUWT in the 30 June email around the potential misuse of the standards post-induction and a twin-track approach to their application are addressed, so that teachers are able to have confidence that they will not become a series of requirements against which they will be constantly judged (Appendix C).

**Ymchwiliad i Addysg a Dysgu Proffesiynol Athrawon – Gwybodaeth Bellach |
Inquiry into Teachers' Professional Learning and Education – Further
Information**

TT FI 06

Ymateb gan: NASUWT Atodiad A

Response from: NASUWT Appendix A

Welsh Government
New professional standards for teaching
and leadership in schools
4 May 2017

1. The NASUWT welcomes the opportunity to comment on the proposals to replace existing Practising Teacher Standards (PTS) and the Leadership Standards (the National Professional Qualification for Headship (NPQH) standards) for school teachers and leaders with new professional standards for teaching and leadership in schools (the new standards).
2. The NASUWT is the largest teachers' union in Wales representing teachers and school leaders.

GENERAL COMMENTS

3. The NASUWT believes that the proposed changes to the professional standards for school teachers and leaders are unnecessary and unhelpful in both construction and design. The Union believes that the intentions of the Welsh Government could have been met by retaining the existing standards, despite some disquiet and misgivings about the NPQH standards.
4. The NASUWT remains deeply concerned that the Welsh Government continues to fail to address effectively the clear evidence presented by the NASUWT, and confirmed by the Welsh Government's own workforce survey, that teachers' professional lives are blighted by excessive workload which is adversely impacting on their health and wellbeing. To fail to address this, whilst continuing to add to the pressure they are facing by introducing revised

standards which will undermine, rather than enhance, teaching and learning and leave teachers vulnerable to absence through poor management practices, is unacceptable.

5. In the NASUWT response submitted in November 2016 to the consultation on the '*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*', the Union set out its position in relation to the draft revised standards which were being trialled prior to this formal consultation. Those draft standards, which reflect the new standards proposed in this consultation, were firmly rejected by the Union as presenting an accountability tool, rather than a set of professional teaching standards (the NASUWT response is appended to this consultation as Annex A).
6. The NASUWT's position has not changed since the trialling of the draft revised standards. Consequently, the Union maintains that the new standards are not fit for purpose as professional standards for teaching and leadership in schools in Wales.
7. In the autumn of 2015, the NASUWT attended a series of New Deal Partnership Group meetings with officials from the Department of Education and Skills (DfES), to discuss a Review of the Professional Standards. A set of draft standards, with illustrative descriptors, which an effective practitioner would be expected to demonstrate, was presented. This set of standards, with the exception of the first standard, which related to the Education Workforce Council (EWC) conduct standards, was considered to be acceptable to the Union. These standards were:
 - **Pedagogy** – select and use the most appropriate teaching and learning strategies to meet the needs of learners.
 - **Curriculum** – provide learners with a curriculum that engages and motivates them to learn and to fulfil their potential.
 - **Assessment** – select appropriate assessment methods to evaluate learning and use this information to make teaching more effective.

- **Learning environment** – create and maintain a safe, stimulating learning environment in which positive behaviour is promoted.
 - **Wider context** – understand the role in the wider educational context in Wales and beyond and the contribution to eradicating inequalities in learner outcomes.
 - **Professional reflection and learning** – engage in career-long professional learning and reflective practice to improve outcomes for learners.
 - **Leadership** – develop and use effective leadership skills throughout your career.
8. The NASUWT maintains that, if it had been thought necessary, the PTS could have been allocated to each of these seven key areas of professional practice to supplement the illustrative descriptors. The NASUWT believes firmly that these seven key areas for professional practice and the illustrative descriptors could, and should have been, proffered in this consultation as the new professional standards for teaching and leadership in schools.
9. The NASUWT notes that the consultation document states that:
- ‘Wales’ vision for teaching and leadership places the learner at the centre of everything we do, ensuring all learners benefit from excellent teaching and learning.’*
10. By contrast, the NASUWT believes that placing **practising teachers** at the heart of education will be the only way to ensure that all learners benefit from effective teaching and learning. The Union is extremely unhappy at the inference that teachers are not currently *‘true professionals who constantly strive to develop and grow’* and maintains that the reference to *‘excellent teaching and learning* is crass.
11. The NASUWT agrees with the statements by Andreas Schleicher, Acting Director and Special Advisor on Education Policy to the Secretary-General, OECD, in the report *Improving Schools in Wales: An OECD Perspective*,

published in 2014 (the OECD 2015 report).¹ Amongst other things, Andreas Schleicher states:

'A thriving education system will allow every student the opportunity to develop as an individual and will strengthen society's capacity for economic growth and social well-being.'

12. The OECD 2015 report set out some key goals for the Welsh Government and recommended that four areas were given priority:

- ensuring that schools meet the learning needs of all their students;
- building professional capital and collective responsibility throughout the system;
- developing a coherent assessment and evaluation framework to promote improvement; and
- defining a long-term education strategy that builds on a select number of core priorities, is adequately designed and resourced and has appropriate governance and support structures².

13. In addition, some clear challenges the Welsh Government would need to face in order to promote improvement were identified in the OECD 2015. The report indicated that:

- recruitment, professional development and career progression policies for teachers, school leaders and support staff are underdeveloped;
- assessment and evaluation arrangements lack coherence and Wales has struggled to strike a balance between accountability and improvement; and
- the pace of reform has been high and lacks a long-term vision, an adequate school improvement infrastructure and a clear implementation strategy all stakeholders share.

¹ OECD, *Improving Schools in Wales: An OECD Perspective*, 2014.

² Op.cit.

14. The OECD 2015 report also recommended that there was a need to:

Simplify and stabilise the use of targeted funding for students. Reduce the complexity of funding arrangements for the support of disadvantaged students and move towards simple, financially stable and efficient mechanisms.

Ensure quality continuous professional development at all career stages. Work with schools, training institutions, and school improvement services to strengthen the provision of high-quality professional development aligned with national education priorities

Streamline and resource school-to-school collaboration

Simplify professional standards. Simplify and reduce the number of professional standards and base them on a vision of the Welsh teacher and leader.

Build school evaluation processes that support school improvement. Ensure the two external school evaluation systems (Estyn's and the school banding system) have greater coherence.

Ensure governance and support structures are effective in delivering reforms. Invest in the professional capital of the regional consortia staff, in particular their pedagogical skills.

15. The NASUWT does not believe that the proposed new standards in either their design or construction will in any way simplify the position on professional standards as identified in the OECD 2015 Report and their use will not provide the Welsh Government with the means of ensuring that teachers have access to quality continuing professional development (CPD).
16. The NASUWT questions the suggestion in the consultation document that the new standards will be portable beyond Wales. The Union does not believe that this would necessarily be the case, as the new standards are neither user-friendly nor fit for purpose.

17. In addition, the NASUWT notes with concern the shift in the language used in this consultation from *'professional development'* to *'professional learning'*. This implies that the onus for the development falls upon the individual teacher and absolves the Welsh Government, regional consortia, local authorities and school management from providing high-quality training and support through CPD. The Union has previously characterised this approach as 'Do-it-yourself CPD' (DIY CPD) and believes firmly that this is not the best way to support teachers. Teachers need a statutory contractual entitlement to professional development.
18. The NASUWT asserts that many of the problems currently being experienced in education in Wales stem from the chronic underfunding of schools. The Union has calculated that the funding gap in 2014-15 between schools in Wales and maintained schools in England stood at £607. This translates into a shortfall of some £283 million missing from schools budgets in Wales.
19. The NASUWT notes that the follow-up report by the OECD, *The Welsh Education Reform Journey*, published in 2017 (the OECD 2017 report), calls on the Welsh Government to support:
- 'the realisation of the national commitment to equity. Consider moving towards a national needs-based school-funding formula that ensures the effective allocation of funds to schools.'*³
20. The NASUWT firmly supports this recommendation. Unless and until schools in Wales are funded on the basis of need rather than pupil numbers, teachers in Wales will continue to struggle for the necessary resources to provide proper professional development and the year-on-year cycle of redundancy will continue to blight the education system in Wales. The Welsh Government's mantra of 'professional learning' is, therefore, viewed in the context of the underfunding of schools, as it is seen as CPD 'on the cheap'.

³ OECD, *The Welsh Education Reform Journey: A Rapid Policy Assessment*.
<https://www.oecd.org/edu/The-Welsh-Education-Reform-Journey.pdf>

21. The NASUWT believes that the problems which have caused the Welsh Government to propose new professional standards are more to do with the failure of too many schools to implement the Performance Management (PM) process effectively and in accordance with the *School Teacher Appraisal (Wales) Regulations 2011* (the 2011 Regulations)⁴ and the Welsh Government's Performance Management Guidance documents numbers 073/2012 and 074/2012 (WG Circulars 073/2012 and 074/2012).⁵
22. The NASUWT notes that the 2017 OECD report identifies that:

*'There needs to be an easy-to-understand narrative about how the different policies of the Welsh education reform journey relate to one another and contribute to realising the vision of the Welsh learner.'*⁶

The Union believes that the Welsh Government has failed to achieve this aim.

23. In the first section of the 'Summary' of the consultation document, 'What is this consultation about?', it is suggested that views are being sought on '*how professional standards can be used more effectively to enable teachers and leaders to reflect on and develop their practice in collaboration with their colleagues and support their professional progression*'. The Union maintains that the new professional standards, as presented in the accompanying PowerPoint presentation, lack sufficient transparency, meaning and coherence to allow such views to be provided.
24. The NASUWT asserts that the publication of the new standards only in the format of a PowerPoint presentation, whilst with possible good intentions, renders the new standards convoluted, complex and confusing. The Union does not believe that in their current form and format, the new standards are capable of being used '*as a tool to stimulate professional dialogue and support all practitioners in the quest for sustained highly effective practice*'.

⁴ <http://www.legislation.gov.uk/wsi/2011/2940/contents/made>

⁵ <http://learning.gov.wales/resources/collections/performance-management?lang=en#collection-3>

⁶ Op.cit.

25. The NASUWT welcomes the statement in the consultation document which refers to current practice enshrined in WG Circulars 073/2012 and 074/2012, in relation to the use of the existing professional standards:

'At all other points in the career of a teacher or school leader, the standards act as a backdrop to performance management and professional development to support professional progression. Practitioners are required to continue to meet the standards, affirmed annually as part of the performance management cycle, but this does not require the standards to be used as an assessment checklist.'

26. The Union notes and welcomes the clear statement that the consultation does not propose to change this practice, and that this is reaffirmed elsewhere in the consultation in relation to the application of the new standards, where it is stated:

'it would not be appropriate to use the standards and their descriptors as an annual checklist of competence or professional growth and to treat each descriptor in an 'achieved or not' approach'.⁷

27. The Welsh Government should be clear that the NASUWT will hold it to account if this approach is abused by those who would visit adverse management practices on the staff with whom they work, and will not hesitate to defend its members using all appropriate means, including industrial action.
28. Regrettably, experience demonstrates that there is every likelihood that the new standards will be applied simplistically as a checklist to judge teachers at all stages of their careers by some. It is an unwelcome and deeply disappointing fact that the PTS have been used as a checklist, despite the clear statements to the contrary in WG Circulars 073/2012 and 074/2012.
29. The Union is, therefore, gravely concerned that the consultation document states that best practice:

⁷ Op.cit.

'will see teachers working in well-led schools where the headteacher and senior leaders build a developing dialogue around the standards to grow, spread, deepen and innovate effective pedagogy'; and

*'The new standards will continue to be used as a backdrop to the performance management process but they are not the only stimulus for informed discussion. The descriptors can provide the focus for professional dialogue and be used to help establish a manageable set of targets, together with an agreement about the support necessary to enable development.'*⁸

30. The NASUWT is concerned that these statements will provide the opportunity for the new standards to be used alongside, as well as part of, the performance management (PM) process. The Union maintains that such an approach is unnecessary, as the PM process provides the means of identifying professional development needs, and it cannot be reconciled with the commitment referred to previously, that the new standards will be used as a backdrop to professional development.
31. Indeed, the NASUWT is deeply concerned that attempts could be made to use the descriptors relating to *'Sustained highly effective practice'* as an assessment tool for 'crossing the threshold' to the Upper Pay Spine (UPS) and a 'job description' for teachers who have progressed to the UPS.
32. The current practice, initiated by the Westminster Government, of linking teachers' pay to performance through the PM process could make this an attractive proposition for those managers who would visit adverse management practices on those with whom they work.
33. The NASUWT notes that the consultation document states that:

'Responsibility for the pay and conditions of school teachers is not devolved to the Welsh Government, and this consultation does not

⁸ Op.cit.

propose changing existing links between professional standards and pay arrangements.'

34. This situation is, of course, in the process of change as the responsibility for teachers' pay has now been devolved to the Welsh Government.
35. Although the NASUWT has serious concerns about this development, the Union recognises that this change could present an opportunity to break the direct link between pay and performance initiated by the Westminster Government. It could enable the Welsh Government to return the PM process to its intended purpose in Wales to support teachers and provide the vehicle for providing high-quality professional development.
36. It is stated explicitly in the consultation document that:
- 'the standards need to better support professional progression by linking more closely to how teachers move through career development pathways. The standards need to support a continuum of professional growth rather than a number of steps that may lack continuity.'*⁹
37. The NASUWT firmly believes that this statement is incompatible with the Welsh Government assertions that the new standards should not be used as an 'assessment checklist' and that they do not '*propose changing existing links between professional standards and pay arrangements*'.
38. The NASUWT notes that the recently published *National Education Workforce Survey* (the Survey) indicates that only 25.8% of school teachers had full access to the professional development that they needed in the previous 12 months.¹⁰ This fell to 10.9% for supply teachers. In addition, 4.1% of teachers and 33.8% of supply teachers stated that they had not undertaken any professional development.
39. In addition, the Union notes that the Survey revealed that 10.2% of teachers had not had a performance management review in the previous 12 months

⁹ Op.cit.

¹⁰ National Education Workforce Survey <http://www.ewc.wales/site/index.php/en/research-statistics/national-education-workforce-survey>

and that 5.7% had never had one. When asked about the current PTS, 57.9% of teachers stated that they had not used the standards when setting performance management objectives, planning professional development or reviewing performance.

40. The NASUWT is alarmed, but not surprised, by these statistics. However, this indicates that the Union is correct in its view that changing the standards will not achieve the Welsh Government's desired outcome without first changing the culture in schools.

41. Together with the Survey result that indicated that 88.3% of teachers cannot manage their workload, these demonstrate that the Welsh Government has not fulfilled its obligations to the 'National agreement: *Raising standards and tackling workload*' - *Time for Standards*.¹¹ It was stated in this agreement that:

'the Welsh Assembly Government supports the need for school workforce reform as a means of delivering contractual change and, in line with the devolution settlement, will determine how this is best achieved in Wales, in partnership with relevant employers and unions';

'but teachers will not be able to make further progress on raising standards for pupils unless we can free them from the shackles of excessive and inappropriate workload'; and

'we consider that investment and reform must go together, as part of a successful partnership between schools, governors, LEAs, national partners and Government, so that we achieve ever higher standards in a future where:

- i. our pupils are supported by a wide range of teachers and other adults, working flexibly and differentiating their approaches to meet pupils' needs; and pupils are developing their own learning skills;*
- ii. our teachers are using effective approaches to teaching and learning, are working in teams with other teachers and support*

¹¹ DfES, *Raising standards and tackling workload: a national agreement, Time for Standards*, 2003.

staff; are committed to their own development and confident in exercising their professional judgement; and have higher status, proper remuneration and rewards, more responsibility and autonomy, more support and a better work/life balance, with teacher numbers growing to ensure effective implementation of reform;

- iii. our support staff are recognised for their contribution to raising standards and have more opportunities to take on extended roles in support of teaching and learning, supported by the right training, standards frameworks and new career paths, with remuneration that reflects their level of training, skills and responsibilities and with overall numbers growing as far as necessary to deliver reform;*
- iv. our headteachers and leadership teams are committed to innovation, leading the change to new, more flexible, ways of working, and to better teaching not just within their own schools, but in partnership with other schools and institutions and with their LEA; are ensuring an appropriate work/life balance for their staff; and are embracing leadership responsibilities in the wider community; and*
- v. our schools are providing a world class education, with well-designed and equipped premises and ICT facilities which can adapt to modern approaches to teaching and learning, and where there is flexibility and creativity in the approach to curriculum delivery and the timetable.¹²*

42. The outcomes from the EWC survey demonstrate that the view expressed in the consultation document that ‘*Professional teachers earn the respect of their colleagues and the wider world by going the distance for their learners*’ is an outmoded and deeply unrealistic concept in the current high-stakes accountability regimes, characterised by the misapplication of PM and

¹² Op.cit

capability procedures that is currently blighting and demoralising the teaching profession in Wales.

43. The suggestion of '*going the distance*' reveals the underlying thinking of the New Deal Pioneers who appear to have little regard for teachers' contractual rights and entitlements and have failed to recognise that the use of such language, and the construction and design of the new standard, could present a 'bullies' charter'.
44. The EWC survey confirms that this approach is not only in breach of the working time requirements enshrined in the School Teachers' Pay and Conditions Document (STPCD)¹³ but also the European Directive on working time.¹⁴ The NASUWT notes with concern that the current PTS, which identifies a need for teachers to manage and prioritise time effectively within their wider professional role, has not been replicated in the new standards.
45. The NASUWT is also extremely concerned by the assertions in the consultation document that '*All teachers, irrespective of career stage, will be able to readily engage with the complete range of professional teaching and leadership standards*'. The Union reminds the Welsh Government that section 3, paragraph 48 of the STPCD explicitly states:

*'Teachers are expected to contribute, both orally and in writing as appropriate, to curriculum development by sharing their professional expertise with colleagues and advising on effective practice. This does not mean that they can be expected to take on the responsibility of, and accountability for, a subject area or to manage other teachers without appropriate additional payment. Responsibilities of this nature should be part of a post that is in the leadership group or linked to a post which attracts a TLR1 or TLR2 on the basis set out in paragraph 20.'*¹⁵

In addition, section 2, part 4, paragraph 20 states:

¹³ DfE, School teachers' pay and conditions document 2016 and guidance on school teachers' pay and conditions, <https://www.gov.uk/government/publications/school-teachers-pay-and-conditions-2016>

¹⁴ <https://www.gov.uk/maximum-weekly-working-hours/overview>

¹⁵ Op.cit.

'before awarding any TLR the relevant body must be satisfied that the teacher's duties include a significant responsibility that is not required of all classroom teachers and that:

- a) is focused on teaching and learning;*
- b) requires the exercise of a teacher's professional skills and judgement;*
- c) requires the teacher to lead, manage and develop a subject or curriculum area; or to lead and manage pupil development across the curriculum;*
- d) has an impact on the educational progress of pupils other than the teacher's assigned classes or groups of pupils; and*
- e) involves leading, developing and enhancing the teaching practice of other staff.'*¹⁶

46. The NASUWT will not accept that these provisions can be over-ridden by the adoption of the new standards in Wales and will resist any attempts to do so by all appropriate means, including industrial action, if necessary.

47. Furthermore, the NASUWT will adopt the same approach to the Leadership Standards as there is no clarity on how the descriptors will be used to determine the award of the NPQH.

SPECIFIC COMMENTS

48. The NASUWT acknowledges that, in some places, one new standard has replaced several of the PTS. This is particularly noticeable in relation to what is assumed to be one of the new standards, '*Pedagogy – Refining teaching: Managing the learning environment*'. The Union maintains that this approach could have been applied throughout the revisions.

¹⁶ Ibid.

49. By contrast, elsewhere several new standards replace a single PTS. The NASUWT believes that this has resulted in considerable overlap and duplication in the new standards. The approach taken by the New Deal Pioneers has not simplified the standards as many of the new standards could more than adequately be covered by the PTS. This is particularly so in the dimensions on 'Collaboration' and 'Innovation'. By way of example, many of the descriptors in these dimensions are adequately covered by the PTS that identify that a teacher should:

'Be actively involved in professional networks and learning communities which share and test beliefs and understandings with colleagues and contribute to the wider development of the school and profession'; and

*'Work co-operatively and collaboratively with other teachers and colleagues, including those from external agencies, to enhance the learning and wellbeing of those they teach.'*¹⁷

50. The NASUWT is particularly concerned that some of the existing PTS have not been replicated in the new standards. The current standards on equality, discrimination, prejudice and inclusion have been omitted. Again by way of example, the PTS suggest that teachers should:

'Make effective personalised provision in their teaching including taking practical account of diversity and promoting equality and inclusion'; and

*'Challenge instances of prejudice, stereotyping, bullying and harassment, in line with school policies and procedures.'*¹⁸

51. Perhaps, most worryingly, the specific reference, in the PTS, to the special educational needs (SEN) code of practice, except for a reference in the 'Expectations of formal leadership practice' (the formal leadership standards) section to 'pupils with additional learning needs' which appears in the 'New formal leadership role descriptor' for the dimension and elements in relation to 'Leading Pedagogy—influencing learners...securing standards, well-being and

¹⁷ Practising Teacher Standards (Wales), Welsh Government Circular No: 020/2011, <http://learning.gov.wales/resources/collections/professional-standards?lang=en#collection-3>

¹⁸ Ibid.

progress: Ensuring and protecting learner entitlement' has been omitted. The PTS states quite simply, clearly and concisely:

'Understand and apply the SEN Code of Practice for Wales to meet the diverse needs of learners.'

52. The PTS referencing the United Nations Convention on the Rights of the Child has also not been replicated in the new standards.
53. The NASUWT is also concerned that in many places the descriptors for the new standards, as they would apply to *'End of induction'* and *'Sustained highly effective practice'* are lower order than the QTS descriptors. Specific examples of this occur in the descriptors for the elements relating to *'Sustained effort and resilience in learners'*, *'Developing new techniques'* and *'Taking responsibility for self'*.
54. Furthermore, it appears to the NASUWT that some of the formal leadership standards are of a lower order than the new standard for professional teaching, particularly the descriptors for the elements relating to *'Listening to learners'* and *'Promoting Welsh language and culture'*.
55. The NASUWT fundamentally objects to any standard being related to learner achievement, which is outside the control of the teacher, rather than to the teacher's input. This is evident in the following dimensions, elements and descriptors:
 - *'Pedagogy – Refining teaching – Managing the learning environment*
 - *Learners articulate the way that their own organisational skills are developing to ensure they take growing responsibility for their own learning*
 - *Pedagogy – Advancing learning – Real life, authentic contexts*
 - *Learners initiate, drive and reflect upon authentic experience which reinforces prior learning and provides context for further development across all four purposes*
 - *Pedagogy – Influencing learners – Challenge and expectations*
 - *Learners relish the opportunity to extend themselves and exploit previous skills whilst developing new ones'*.

NASUWT

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Yr undeb athrawon mwyaf yng Nghymru

56. The NASUWT maintains that the use of these descriptors could lead to teachers being judged on new pupil performance data, which in turn could, under the current arrangements, impact on their pay. Whereas the NASUWT has in the past accepted a link between teacher performance and pay through the performance management process, notably to ‘crossing the threshold’ to the UPS and movement along the UPS, the Union has never supported ‘payment by results’.
57. The NASUWT is also uncomfortable with the use of the word ‘*evidence*’ throughout the new standards. This does not accord with the aims stated in the consultation document that the use of the new standards is to promote dialogue between professionals. The Union maintains that the use of an evidence-based approach identified in the descriptors could lead to excessive monitoring and accountability for classroom teachers. This would not be acceptable to the NASUWT and would be resisted by all appropriate means, including industrial action if necessary.
58. Additionally, the NASUWT believes that some of the language is unrealistic, and could result in unintended high-stakes accountability practices being visited on teachers and school leaders, particularly the use of the words ‘*ensure*’ and ‘*secures*’. This is evident in:
- *‘Pedagogy – Influencing learners – Sustained effort and resilience in learners;*
 - *The teacher promotes and secures learners’ self-motivation and self-direction in their learning;*
 - *The teacher ensures that learners reflect upon the extent to which they have stretched themselves and been resilient in solving problems and challenges in their learning’;* and
 - *‘Leading Pedagogy – Refining teaching...from vision to provision to impact - Sustaining highly effective teaching*

- *Leadership ensures that learners experience highly effective teaching in all contexts’.*
59. The Union suggests that such language should be replaced by aspirational phrases such as ‘*strive to*’ and ‘*encourages*’.
60. The NASUWT is fundamentally opposed to the strict adherence to the use of ‘pupil voice’ without conditions. This is particularly evident in the dimension, element and descriptors relating to ‘*Pedagogy - Influencing learners - Listening to learners*’.
61. The NASUWT is also concerned that some of the new standards are dependent on teachers being afforded the time and opportunity to undertake tasks. This is evident in the following dimensions, elements and descriptors:
- *‘Professional Learning – Wider reading and research findings*
There is structured engagement in an action research community and evidence of practice informed by wider reading and research findings on a national and international scale
 - *Professional Learning – Continuing professional learning*
Continuing professional learning is driven by the teacher carefully framing professional growth within the context of the four purposes and a commitment to lead development for colleagues within and beyond the school.’
62. The NASUWT supports, in principle, the Welsh Government’s aspiration to increase the number of Welsh speakers in Wales. However, the Union questions seriously the imposition of requirements being placed upon all classroom teachers to ‘*incremental development of personal skills in the use of the Welsh language*’ and to actively seeking ‘*opportunities to apply and extend their understanding and skills in the use of the Welsh language*’ to be disproportionate to the number of Welsh medium and bilingual schools in Wales. At September 2016, only 27.0% of all schools in Wales are Welsh-medium and 7.5% bilingual. Thus 65.5% are English-medium only schools.
63. The NASUWT cannot accept that there is a necessity for teachers and school leaders to innovate all the time as is set out in the descriptors relating to the

'Innovation' dimensions for both the new standards for professional teaching and the standards for formal leadership practice. The Union considers that innovation on a constant basis is, quite simply, neither possible nor desirable. Indeed, the Union maintains that the concentration on innovation will leave schools open to adopting the latest 'fad or craze' in education without proper consideration of the workload implications for teachers and school leaders or the impact on pupils.

64. The NASUWT notes that the provision of specialist advice and guidance on the best teaching and learning techniques and processes used to be the function of local authorities' education advisory services, without teachers having to constantly 'reinvent the wheel', or 'innovate'. Unfortunately, these services have been lost due to the savage cuts to local authorities' central education budgets as a result of a mantra to devolve funding to schools and have been replaced by regional consortia, whom teachers generally perceive as a second inspection body rather than a support service.

65. The NASUWT believes that it is worth noting here the recommendation in the OECD 2014 report which stated:

'Ensure governance and support structures are effective in delivering reforms. Invest in the professional capital of the regional consortia staff, in particular their pedagogical skills.'

66. This was followed up in the OECD 2017 report with a further recommendation to the Welsh Government that:

'Regional consortia should continue 1) to invest in their own capacity and strengthen the evidence base for their school improvement services and 2) co-ordinate and collaborate among themselves, enhancing consistency in the quality of services. Teacher education institutions should be encouraged to work with regional consortia to support school improvement efforts.'

67. The Union does not believe that this recommendation has been acted upon effectively, as the responsibility and workload has instead been placed on classroom teachers and school leaders through the regional consortia challenge advisors. This practice is unacceptable to the NASUWT and it is a

matter of concern that the new standards, as presented, will only serve to exacerbate this situation. Indeed, the NASUWT asserts that the new standards have been developed primarily by the education establishment for this very purpose.

68. The NASUWT is not clear how the Professional Learning Passport (PLP) could be viewed as supporting the use of the new standards, as suggested in the descriptors relating to the '*Continuing professional learning*' element of the '*Professional Learning*' dimension. In particular, the statement that '*The Professional Learning Passport influences the ongoing learning of the teacher*' is nonsensical, as the PLP is simply an online space.
69. Similarly, the Union is unclear as to how the PLP can be used as a tool to support personal reflection and how hosting the standards online assists.
70. The NASUWT cannot accept the timescales set out for the adoption of the new standards. The introduction must take into account the annual cycle for PM. Teachers cannot set objectives within PM using the new standards as a backdrop before the new standards come into force on 1 September 2018. Any PM cycle set against the backdrop of the PTS must run its full course before the new standards are applied as a backdrop to the PM process.
71. The NASUWT questions seriously the evidence upon which the statement in the consultation document that '*Most teachers and headteachers will elect to transfer to the new standards immediately*' is based, and maintains that it is entirely misleading. Further, the '*alternative*' that '*the individual may decide to transfer to the new standards at the most appropriate point in the performance management cycle*' is not an option within the PM process. The new standards can only be used as a backdrop from the start of a PM cycle. To do otherwise would make a mockery of the PM process, which is enshrined in law.
72. The Union is also concerned that the timescale for Newly Qualified Teachers commencing induction on 1 September 2017 does not provide sufficient time for the regional consortia to have the appropriate support in place.

73. Furthermore, the NASUWT is concerned regarding the impact on the transition to the new standards for Initial Teacher Education or Training (ITET) students, particularly those undertaking Postgraduate Certificate in Education (PGCE) courses and consider that the proposals in the consultation document lack clarity.
74. The NASUWT also cannot understand the assertion in the consultation document that: *'The limitations of the current standards are evident by requiring entrants to the profession to be assessed against two different sets of standards in quick succession, often within the first two years after entering ITE'*. The proposed changes to the standards, as well as the recent publication on ITET standards, indicate that there will still be two assessments to two different strands of standards, normally one year apart, for Qualified Teacher Status and Induction.
75. In the NASUWT response to the consultation on the *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* (Annex A), the Union suggested that it would be more appropriate for the Welsh Government to wait until the revised standards have been consulted on, agreed and subsequently published before developing the ITE accreditation criteria.
76. The NASUWT notes that, despite this suggestion, the new standards have already been incorporated into the Welsh Government guidance on *Criteria for the accreditation of initial teacher accreditation programmes in Wales* (Welsh Government Circular 004/2017) published in March 2017.¹⁹ This situation is wholly unacceptable as it brings into question the credibility and meaningfulness of this consultation.
77. The NASUWT is extremely concerned that the descriptors for the dimensions and elements relating to QTS do not contain any reference to subject

¹⁹ <http://learning.gov.wales/docs/learningwales/publications/170310-accreditation-criteria-for-initial-teacher-education-en.pdf>

knowledge and understanding. The current QTS standards, by contrast, contain a whole section on ‘*Knowledge and understanding*’, which requires trainees to demonstrate a secure knowledge and understanding of the subject(s) they are trained to teach.²⁰

78. Indeed, the ‘*Using cross-curricular theme*’ element of the dimension ‘*Pedagogy – Advancing learning*’, which states ‘*The use of cross-curricular themes is routinely employed and the range exploits complex learning which is made explicit through effective reflection on learning*’, appears to detract from the specific subject knowledge required to deliver effective teaching.
79. The NASUWT does not raise these issues, concerns and objections in order to suggest an increase in the numbers of new standards. The purpose in highlighting the difficulties and problems encountered by the NASUWT in attempting to make sense of the new standards is to illustrate that the New Deal Pioneers, the architects of the new standards, have indulged themselves in an exercise of futility.
80. What is presented is an almost impenetrable, labyrinthine set of rules, requirements and demands by which teachers will be judged.
81. Consequently, the NASUWT formally and firmly rejects the new professional standards for teaching and leadership.

Consultation Questions

82. The NASUWT offers the observations and comments that follow in relation to the questions posed on the consultation response form.

Question 1 – Do you agree that the proposed new professional standards should reflect this vision?

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor	<input type="checkbox"/>
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²⁰ Qualified Teacher Status Standards Wales 2009, <http://gov.wales/legislation/subordinate/nonsi/educationwales/2009/3220099/?lang=en>

				disagree	
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Supporting comments

The NASUWT assumes that this refers to the vision for teaching and leadership as set out on page 5 of the consultation document.

As stated earlier in this response, the Union:

- does not agree with the shift in the language from ‘*professional development*’ to ‘*professional learning*’ which presents a DIY CPD approach;
- rejects the notion that teachers are not currently ‘*true professionals who constantly strive to develop and grow*’; and
- condemns the suggestion that ‘*Professional teachers earn the respect of their colleagues and the wider world by going the distance for their learners*’, as failing to respect the contractual rights and entitlements of teachers.

The vision completely ignores the fact teachers are currently working over 50 hours per week, which is not only in breach of the provision on working time enshrined in the STPCD but also the European Directive on working time.

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

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

The NASUWT assumes that this refers to the principles and purposes set out on page 7 of the consultation document.

As stated elsewhere in this response, the NASUWT maintains that:

- the new standards will not resonate with teachers and will not contribute in any way to raising the status of the profession;
- the new standards are not capable of supporting career-long professional development that enables and inspires individuals to lead their own professional learning, and that of others;
- DIY CPD is not the best way to support teachers;
- the new standards are neither user-friendly nor fit-for-purpose; and
- the new standards will not provide portability beyond Wales.

The suggestion that the new standards identify clearly the requirements for entry into the profession and set expectations throughout a professional career is risible given the format in which the new standards have been presented.

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"/>
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Supporting comments

The NASUWT believes that the proposed changes to the professional standards for school teachers and leaders are both unnecessary and unhelpful in both construction and design.

As referred to elsewhere in this response, the Union maintains that the seven key areas for professional practice and the illustrative descriptors presented to the New Deal Partnership Group in the autumn of 2015 could, and should, have been proffered as the new professional standards for teaching and leadership in schools.

Question 4 – Do you agree that 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"/>
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Supporting comments

The NASUWT has set out significant concerns in relation to the elements and the descriptors elsewhere in the response.

The Union maintains that the descriptors:

- are poorly constructed as there is significant duplication and overlap;
- frequently contain language that is inappropriate;
- are sometimes incorrectly aligned to the three career stages;
- lack sufficient transparency, meaning and coherence; and
- are convoluted, complex and confusing.

Regrettably, as presented, through a PowerPoint presentation only, the elements and the descriptors provide an almost impenetrable, labyrinthine set of rules, requirements and demands by which teachers will be judged and, as a result, are formally and firmly rejected by the NASUWT.

Question 5 – Do you agree that 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 checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments

The NASUWT draws attention to the issues, concerns and objections set out

throughout this response.

In particular, the Union objects to the DIY CPD approach that not only places the onus for professional development falling upon the individual teacher, but also absolves the Welsh Government, regional consortia, local authorities and school management from providing high-quality developmental support to the school workforce within the school day.

Question 6 – Do you agree that 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 checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments

The NASUWT considers that this expectation presents a potential breach of teachers' conditions of service as set out in paragraphs 44 and 45 of this response.

The Union will oppose this change.

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

The NASUWT reminds the Welsh Government that the use of the PLP is optional and voluntary for all teachers, subsequent to passing induction.

The Union expects the professional standards for teachers to continue to be set out in the STPCD.

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

The NASUWT considers the approaches, as set out in this consultation, to be opaque and confusing and cannot see how they could in any way improve the professional practice of teachers and leadership in schools.

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"/>
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Supporting comments

The NASUWT has set out above at paragraphs 72 to 76 the Union’s concerns about the timescale suggested for the implementation of the new standards.

In particular, the Union maintains that the introduction of the new standards cannot be allowed to over-ride the law in relation to the PM process.

The NASUWT insists that any PM cycle set against the backdrop of the PTS must run its full course before the new standards are applied as a backdrop to the PM process.

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

The NASUWT has set out its concerns regarding the impact on the Welsh language in paragraph 54 and 55 of this response.

Regrettably, the NASUWT believes that the requirements placed upon all classroom teachers are disproportionate and could potentially be career threatening.

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

The NASUWT believes that the proposals could have the unintended consequence of treating the English language less favourably than the Welsh language.

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.

The NASUWT is aware that a set of professional standards for teachers in the further education sector are being developed and will soon be presented for formal consultation.

Notwithstanding the issues, concerns and objections set out in this response, the NASUWT strongly urges the Welsh Government to await the publication of those standards before proceeding with the standards proffered in this consultation.

Chris Keates

Chris Keates (Ms)

General Secretary

For further information on the Union's response, contact Rex Phillips, National Official for Wales.

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ANNEX A

NASUWT  **CYMRU**
Undeb yr Athrawon The Teachers' Union

**CONSULTATION
RESPONSE**

Welsh Government
**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**
2016

NASUWT
The largest teachers' union in Wales
Yr undeb athrawon mwyaf yng Nghymru

83. The NASUWT welcomes the opportunity to comment on the Draft criteria for the accreditation of Initial Teacher Education programmes in Wales and the proposal for the Education Workforce Council [EWC] to accredit initial teacher education [ITE] (the draft criteria).

84. The NASUWT is the largest teachers' union in Wales representing teachers and school leaders.

GENERAL COMMENTS

85. The NASUWT notes that the proposals set out in the consultation document are based in large part on the findings of Professor Furlong's independent report, *Teaching Tomorrow's Teachers* (the Report).

86. The Report asserts that ITE across Wales is not consistently effective and that the quality of ITE has deteriorated since his last report in 2006.

87. The consultation document sets out proposals that, in part at least, seek to address the concerns identified in the Report, namely:

- to revise the criteria for the accreditation of ITE; and
- to pass responsibilities for accrediting ITE from the Higher Education Funding Council for Wales (HEFCW) to the EWC.

88. The NASUWT maintains that the timing of this consultation is premature, given that the Welsh Government notes that the current Practising Teacher Standards (PTS), which are also used as the end of induction standards for tyro teachers, are currently under revision. The revised standards have yet to be subjected to formal consultation, however, and quite bizarrely, it is suggested in the consultation document that they should be incorporated into the ITE accreditation standards at a later date. The Union believes firmly that this approach is not a sensible basis on which to proceed.

89. The NASUWT suggests that it would be more appropriate for the Welsh Government to wait until the revised standards have been consulted on, agreed

and subsequently published before developing the ITE accreditation criteria. It may well be the case that content of the revised standards would require substantial revisions to be made to the ITE accreditation criteria, if the 'cart is put before the horse'. Furthermore, the draft revised standards which are currently being trialled prior to formal consultation have been firmly rejected by the Union as they present an accountability tool/framework for professional development, rather than a set of professional teaching standards.

90. Consequently, the NASUWT maintains that this consultation should be postponed until the position on, and content of, the revised standards is clearly established.

91. Notwithstanding the fact that the assertions about the current quality of ITE are contentious, the NASUWT notes that it is not made clear in the Report why giving responsibilities for accreditation to the EWC would improve the quality of provision. The Union asserts that there is no necessary correlation between the quality of ITE and the fact that the EWC might be given responsibility for it.

92. In noting that the Welsh Government claims that the Report recommends that responsibilities for accrediting ITE should pass to the EWC, the NASUWT maintains that this claim rather misrepresents the Report's findings. The Report states that responsibilities for ITE accreditation should transfer to 'a regulatory body'. Implicit in this proposal is that such a body should be sufficiently competent to undertake these duties. The NASUWT does not believe that the EWC in its current form would meet this basic test.

93. Further, the Union questions seriously the proposal to establish a Teacher Education Accreditation Committee, sitting within the EWC, to undertake the associated responsibilities. It is suggested that this Committee would be comprised of members of both the profession and Estyn, experts in ITE and current or recently retired headteachers. This proposed model is justified on the basis that it replicates models used successfully in Scotland and Southern and Northern Ireland, where the regulatory bodies all have a role in the accreditation programmes of ITE. The General Teaching Council for Scotland (GTCS) is cited as a model of best practice.

94. The NASUWT maintains that it is important to recognise that, unlike the EWC, the GTCS is well-established, has relatively high standing across the teaching profession and the public, and has a clearly delineated regulatory remit. The Union asserts that the EWC cannot reasonably be described in comparable terms.

95. The Union notes with incredulity that the Welsh Government is seeking to give the EWC a wider range of responsibilities in order to enhance its status, and argues strongly that this is not an appropriate basis on which to allocate critical responsibilities for the accreditation of ITE. Instead, the NASUWT suggests that the EWC should demonstrate that it can act coherently, consistently and equitably in relation to its existing responsibilities, before additional functions are allotted to it.

96. The NASUWT welcomes the fact that the draft criteria acknowledge that effective ITE programmes recognise the multifaceted nature of effective approaches to teacher formation. In particular, the consultation document rightly notes that programmes should be based on a blend of practical and academic learning and emphasises the need for strong links between theory and practice in all programmes of teacher formation.

97. Further, the Union acknowledges that the draft criteria:

- envisage closer working between schools and higher education institutions (HEIs);
- reflect the established view of the Welsh Government that fewer schools should be involved in the training of teachers;
- purport to set out the way in which these partnerships should be structured; and
- detail the processes associated with the partnerships as well as programme inputs, standards and outcomes.

98. However, while it is recognised that this approach is not objectionable in principle, the Union maintains that there is a need for clarity about the way in

which the 'lead partnership' schools involved in training will be identified and supported to meet the expectations set out in the draft criteria.

99. The NASUWT cautions that the implementation of the draft criteria could place significant pressure on staff in schools and maintains that it will be essential that they are applied in ways that take into account the need to continue to:

- exert downward pressure on teacher workload;
- provide training, time and support for school staff involved in ITE; and
- ensure that overall responsibilities for schools are manageable.

100. Further, while it is noted positively that the draft criteria include a recognition that protected time for staff with ITE responsibilities must be provided, the Union asserts that minimum expectations about the amount of time to be made available and the criteria for accessing it should be set out in more detail.

101. The NASUWT believes that much greater emphasis should be placed on these considerations if the criterion relating to '*school staffing and responsibility for student teachers*' is to carry necessary weight in terms of the accreditation of provision. In addition, the Union maintains that the body eventually given responsibility for the application of these criteria must also be given an unequivocal responsibility to take full account of these considerations in its decision making.

102. The NASUWT is clear that the partnership arrangements between the schools and the HEIs must be managed well if both are to play an effective role in providing high-quality ITE. However, the Union is concerned that the draft criteria do not set out in sufficient detail how such relationships should be managed at local level and fail to identify fully the requirements in relation to the training of teachers involved in the delivery of ITE, particularly in respect of the selection of candidates.

103. Consequently, the NASUWT believes that the draft criteria should be amended accordingly.

SPECIFIC COMMENTS

104. The NASUWT offers the observations and comments that follow in relation to the questions posed on the consultation response form.

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

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
Supporting comments					
<p>The NASUWT does not believe that the EWC in its current form is an appropriate body to take on the statutory responsibility for accrediting all programmes of ITE in Wales for the reasons given at paragraphs 9 to 13 of this response.</p>					

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

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
If no, please specify the further detail that should be provided.					
<p>As identified at paragraph 13 of this response, the NASUWT maintains that the EWC needs to command the respect of the teaching profession before consideration is given to enhancing its role in this way.</p>					

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"/>
If no, please specify the further detail that should be provided.					
<p>Whereas it is acknowledged that the construction of the draft criteria has merit in principle, the NASUWT is concerned that they lack sufficient detail in key areas as identified in paragraphs 14 to 21 of this response.</p>					

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

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
If no, please specify the further detail that should be provided.					
The NASUWT agrees in principle with the roles and responsibilities proposed for schools and HEI partnership, subject to the concerns expressed at paragraphs 16 to 21 of this response.					

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

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
If no, please explain why.					
The NASUWT would require a commitment from the Welsh Government that the concerns expressed at paragraphs 16 to 21 will be addressed before agreement with the overarching requirements that accredited providers must meet for all programmes of ITE study could be expressed.					

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

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
If no, please explain why.					
Apart from being very poorly constructed, the NASUWT questions seriously the reference in the entry requirements to becoming ‘excellent’ teachers, as this feeds into the high-stakes accountability regimes and the misapplication of performance management and capability procedures that is currently blighting and demoralising the teaching profession in Wales.					
The NASUWT asserts strongly that the entry requirements should refer to becoming capable and competent teachers.					

Further, the NASUWT questions whether the entry requirements have been equality proofed, especially but not exclusively in terms of the ability of refugees and asylum seekers to enter the teaching profession in Wales.

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 type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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If no, please explain why

The NASUWT does not believe that the EWC in its current form is an appropriate body to take on the statutory responsibility for accrediting all programmes of ITE in Wales for the reasons given at paragraphs 9 to 13 of this response. Consequently, the Union disagrees with this proposal.

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

The NASUWT questions whether such action is necessary.

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

The NASUWT questions whether such action is necessary.

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

As referred to in answer to question 6 above, the NASUWT expects the entry requirements for student teachers in Wales to be both equality proofed and proofread.

**Ymchwiliad i Addysg a Dysgu Proffesiynol Athrawon – Gwybodaeth
Bellach | Inquiry into Teachers' Professional Learning and Education –
Further Information**

TT FI 06

Ymateb gan: NASUWT Atodiad B

Response from: NASUWT Appendix B

Welsh Government

**Draft professional teaching standards for the further
education and work-based learning sectors in Wales**

20 July 2017

1. The NASUWT welcomes the opportunity to comment on the proposals for new professional standards for further education (FE) teachers and work-based learning (WBL) practitioners.
2. The NASUWT is the largest teachers' union in Wales representing teachers and school leaders.

GENERAL COMMENTS

3. The NASUWT acknowledges from the outset that the draft professional standards for FE teachers and WBL practitioners (the draft FE standards) present a far more transparent and accessible set of standards than the almost impenetrable standards maze proffered by the Welsh Government as draft professional standards for teaching and leadership in schools (the draft school standards).
4. In responding to the consultation on the draft school standards, the NASUWT highlighted numerous issues, concerns and objections which rendered them unfit for purpose. The Union condemned the draft school standards, and the PowerPoint presentation which formed the basis of the consultation, as an almost impenetrable, labyrinthine set of rules, requirements and demands by which teachers would be judged. Consequently, the NASUWT formally and firmly rejected the draft school

standards (a copy of the NASUWT response and annex is attached as Appendix A).

5. In contrast, the NASUWT welcomes the clarity and simplicity of the design and construction of the draft FE standards, the short and efficient process used to develop them, and the five key principles which have formed the basis of the thinking behind the standards.
6. The Union maintains, however, that there is room for these standards to be streamlined further so that a more concise and generic set of professional standards could be offered across the school and college sectors.
7. The NASUWT notes that in the section of the engagement survey document '*Why are we proposing change?*' it is suggested that the Welsh Government is revising the standards in order to raise ambitions within the FE sector. Whilst it is recognised that there is never any room for complacency, the Union asserts that it is important that this suggestion is not interpreted as meaning that the performance of the sector is deficient, as such a view would be wholly unsupported by evidence.
8. The NASUWT maintains that ambitions for FE provision should not be translated into additional requirements that add to already excessive levels of workload or distract the workforce from their core responsibilities for teaching and learning. Standards in the sector will only continue to rise if the workforce is given the opportunity to concentrate on tasks and activities focused on their professional expertise and skills. The Union does, however, recognise that the tone, thrust and construction of the draft FE standards is based on a trust in the workforce in the FE sector and to a large extent reflects these critical considerations.
9. However, on a note of discontent with the draft FE standards, the NASUWT objects strongly to the presentation of the standards as a series of personal commitments, as this is too akin to the concept of taking or swearing an oath. The Union maintains that this personal-

affirmation style is not appropriate, as it is somewhat de-professionalising, contradicts the stated intention of the standards to enhance the status and esteem of the profession, and could encourage the standards to be used as a performance checklist.

10. In noting the contention, in the section of the engagement survey document '*Why are we proposing change?*', that it will be important to align the FE standards with the new school standards where appropriate, the Union maintains that this view fails to appreciate that there can be no circumstances where this would be appropriate, because of the fundamentally flawed nature of the draft school standards.
11. The NASUWT acknowledges the view expressed in the section of the engagement survey document '*Links to the new draft professional standards for teaching and leadership in schools*' that the five dimensions of practice in the draft school standards are reflected largely in the five key principles on which the draft FE standards were based. Thereafter, however, the Union asserts that the architects of the draft school standards, the New Deal Pioneers, lost their way and indulged themselves in an exercise of futility.
12. Notwithstanding the New Deal Pioneers' wasted venture, the Union believes that it should be possible to incorporate the draft FE standards into the set of draft standards and descriptors which were presented by officials from the Department of Education and Skills (DfES) in the autumn of 2015, at the outset of a series of New Deal Partnership Group meetings to discuss the Review of the Professional Standards.
13. In the response to the draft school standards, the NASUWT confirmed that this set of draft standards and descriptors, with the exception of the first standard which related to the Education Workforce Council (EWC) conduct standards, was considered to be acceptable to the Union. The remaining standards and illustrative descriptors comprise:
 - **Pedagogy** – select and use the most appropriate teaching and learning strategies to meet the needs of learners;

- **Curriculum** – provide learners with a curriculum that engages and motivates them to learn and to fulfil their potential;
 - **Assessment** – select appropriate assessment methods to evaluate learning and use this information to make teaching more effective;
 - **Learning environment** – create and maintain a safe, stimulating learning environment in which positive behaviour is promoted;
 - **Wider context** – understand the role in the wider educational context in Wales and beyond and the contribution to eradicating inequalities in learner outcomes;
 - **Professional reflection and learning** – engage in career-long professional learning and reflective practice to improve outcomes for learners;
 - **Leadership** – develop and use effective leadership skills throughout your career.
14. The Union does not intend to attempt to integrate the draft FE standards into these standards and illustrative descriptors in this response.
15. Instead, the NASUWT calls on the Welsh Government to build on the work undertaken in producing the draft standards by entering into meaningful consultation directly and solely with the education workforce trade unions with a view to reaching agreement on a generic set of professional standards that are clear, concise and easily accessible, and that can be applied across the education sectors.

SPECIFIC COMMENTS

16. The NASUWT offers the observations and comments that follow in relation to the questions posed on the consultation response form.

Aims, principles and model

Question 1 – Do you agree that the aims and the six key principles on which the standards have been developed are appropriate as a basis for developing these new professional standards?

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

The NASUWT offers broad agreement with the aims of the five, not six, key principles on which the draft FE standards have been developed.

In noting that the concept of ‘*dual professionalism*’ reflects the abilities and attributes of the education workforce and their role as leaders of, and experts in, learning and teaching, the NASUWT acknowledges that the tone and thrust of the five key principles is based on a trust in the workforce in the FE sector.

The contrast with the vision for the draft school standards, which suggests that practitioners are not true professionals who constantly strive to develop and grow, could not be clearer.

However, on a note of caution, whilst it is acknowledged that the commitment set out in the document that professional collaboration is a fundamental element of effective provision, the NASUWT is clear that such collaboration should be organised in a way that recognises the professional agency of the workforce to use their judgement and expertise to determine the forms that such collaboration should take, as any notion of mandating collaboration and imposing models on the workforce would not only be inconsistent with recognising the professionalism of the workforce but would also impede the benefits for learners that genuine professional collaboration can generate.

Question 2 – Do you agree with the statement that a particular blend of values, skills and knowledge taken together define professionalism in action and high-quality learning?

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

The NASUWT acknowledges and welcomes the clarity and simplicity of the DNA-like model of professionalism, illustrated in the engagement survey, which explains simply and concisely how the three elements of values, skills and knowledge interlock and define the professionalism that exists within the FE and WBL workforce.

Again, the contrast with the draft school standards, which comprise a tangled web of values and dispositions, dimensions, elements and descriptors, could not be clearer.

Question 3 – Do you agree that the values, skills and knowledge capture the appropriate requirements for sustained highly effective teaching?

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

As stated in answer to question 2, the NASUWT recognises the concise and transparent nature of the DNA-like model of professionalism contained in the draft FE standards which contrasts with the convoluted and almost impenetrable nature of the draft school standards.

Question 4 – Do you agree that the personal commitment statement and descriptors for further education (FE) teachers/work-based learning (WBL) practitioners will support them to take responsibility for their career-long professional learning?

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

Whilst acknowledging that the standards enshrined in the statements would assist practitioners to recognise the value of engaging in career-long professional learning, as stated elsewhere in this response, the NASUWT rejects the personal-affirmation style in which the standards have been presented, as this is too akin to the concept of taking or swearing an oath.

Question 5 – What are your views on how well the new standards will support you to reflect on your practice and to plan your professional learning?

Comments

The NASUWT notes that this question is directed specifically at individual practitioners and will, therefore, await the outcome of this aspect of the engagement survey with interest.

Organisation/employer

Question 6 – What are your views on how well the new standards will support your organisation to engage your staff to reflect on their practice and to develop their and your own organisation's professional learning?

Comments

As with question 5, the NASUWT notes that this question is directed at a specific group of consultees and will, therefore, await the outcome of this aspect of the engagement survey with interest.

Question 7 – 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?

Comments

The NASUWT finds no reason to believe that the draft FE standards would affect the opportunities for people to use Welsh or would cause the Welsh language to be treated less favourably than the English language.

Indeed, the Union notes that the draft FE standards recognise specifically the importance of the Welsh language and culture and its place in the world, and includes a standard which positively promotes the need for an understanding

of the same and for personal development of the use of the Welsh Language.

The NASUWT maintains that this presents a more proportionate approach to that proffered in the draft school standards.

Question 8 – Please also explain how you believe the proposed new professional 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.

Comments

The NASUWT finds no reason to believe that the draft FE standards would impact, either positively or adversely, on opportunities for people to use the Welsh language or on treating the Welsh language no less favourably than the English language.

Indeed, the Union notes that the draft FE standards recognise specifically the importance of the Welsh language and culture and its place in the world, and includes a standard which positively promotes the need for an understanding of the same and for personal development of the use of the Welsh Language.

The NASUWT maintains that this presents a more proportionate approach to that proffered in the draft school standards.

Question 9 – 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.

The NASUWT reiterates the view that the Welsh Government should build on the work undertaken in producing the draft standards for the school and FE sectors by entering into meaningful consultation directly and solely with the education workforce trade unions, with a view to reaching agreement on a generic set of professional standards that are clear, concise and easily

accessible, and that can be applied across both sectors.

From: Rex Phillips
Sent: 30 June 2017 07:55
To: 'Phil.Jones@wales.gsi.gov.uk'
Subject: First follow up meeting on the draft Professional teaching and leadership standards

Phil,

2 Rf 1/9/17

Following our meeting on Thursday 29 June, I thought it would be useful to set out my understanding of the issues we discussed and the position reached at the end of the meeting, and to highlight some other issues that have the potential to be 'deal breakers', especially in light of the information contained in the document *Consultation – summary of responses* which I had not had time to consider in any depth prior to our meeting.

For the sake of clarity and transparency, I have set out the issues as a series of points as close to the order in which I recall they arose.

1. It was accepted by the Welsh Government that the use of the PowerPoint presentation as a means of consulting on the standards had been misguided and had caused confusion. The NASUWT welcomed this acknowledgement and referred to the consultation on the FE standards which is currently taking place and suggested that it may be prudent to consider one set of standards for the school and FE sector. The Welsh Government indicated that this had been the original intention but it had been opposed by UCU. On both counts, the NASUWT expressed surprise at these revelations.
2. The Welsh Government suggested that the five dimensions could be presented as the new professional standards with the elements and descriptors providing a narrative for each of the standards at *QTS*, *End of Induction* and *Sustained highly effective practice*. The NASUWT welcomed the suggestion as there would be just five professional standards but pointed out that *Pedagogy* was divided into three dimensions which, in practice, would present seven standards.

It was recognised by the NASUWT that, for *QTS*, the elements and descriptors present 32 requirements which will need to be met in order to gain *QTS*. Likewise, it was recognised that the elements and descriptors relating to *End of Induction* present 32 requirements which will need to be met in order to complete Induction successfully and that this is less than the 55 Practising Teacher Standards (PTS) which are used currently as the End of Induction standards.

3. It was acknowledged by the Welsh Government and the NASUWT that, notwithstanding the extent of the concerns expressed in the NASUWT's consultation response in relation to the nature, construction and detail of some of the descriptors, the main concern with the new standards related to how they would be applied in practice post Induction.

The Welsh Government was clear that post Induction it would be recognised that teachers would be respected as highly trained professional who were continuing to meet the *End of Induction* standards and that the elements and descriptors relating to *Sustained highly effective practice* would **not** present a series of requirements which would need to be met by teachers. However, the Welsh Government pointed out that where it was identified that a teacher or school leader was failing to meeting the *End of Induction* standards the procedures to address under-performance may need to be applied. It was proffered by the Welsh Government that it would be for teachers to decide on the elements and descriptors they wish to consider post Induction to develop and enhance their practice, and that the elements and descriptors relating to *Sustained highly effective practice* should be seen and received by teachers and school leaders as presenting a framework for career-long learning rather than an accountability framework.

The NASUWT welcomed this suggestion but pointed out that the approach identified in the consultation document where it was stated '*At times, and at least annually, a mentor or line manager should consider effectiveness of practice with the teacher to help build a profile of development over time*' would present a twin-track approach to professional development/learning, as the system of Performance Management (PM) already provided the vehicle for considering both the effectiveness of practice and the professional learning needs and desires of teachers (appraisees).

The NASUWT reminded the Welsh Government that a crucial short-coming of the PM system was that the professional development needs of appraisees are identified at the end of the review meeting of a current PM cycle rather than at the conclusion of the planning meeting for a forthcoming PM cycle, and that this issue had

been raised by the NASUWT on numerous occasions in the past. The Welsh Government acknowledged that now may be the opportune moment to reconsider the PM process and guidance.

The NASUWT stressed that a 'twin-track' approach to identifying professional development/learning needs would not be acceptable and that time would need to be provided within the school day for teachers to access professional development/learning/research materials, as a 'DIY CPD' approach would also be unacceptable because it could impact adversely on the contractual right of teachers and headteachers to a work/life balance.

4. It was acknowledged by the Welsh Government and the NASUWT that the expectation in relation to the application of the standards post Induction would require a culture change in schools and within the education establishment generally, with Estyn, the Consortia and Local Authorities cited by the NASUWT as having to embrace the cultural change as well as school senior management teams and governing bodies.
5. The NASUWT questioned the assertion in the consultation document that '*Most teachers and headteachers will elect to move to the new standards immediately...*' as being unsupported by evidence and irreconcilable with the PM process which currently relies on the PTS enshrined in the School Teachers' Pay and Conditions Document (STPCD). The NASUWT acknowledges that the consultation document was clear that any decision to move to the new standards before September 2018 would rest with individual teachers and that this has been confirmed in the Welsh Government's response to the consultation in the *Consultation – summary of responses*.

However, it is evident that the right of individual teachers in terms of moving to the new standards prior to September 2018 will need to be clearly articulated to schools by the Welsh Government when read alongside the following comments from *Schools and Practitioners in Consultation – summary of responses*: '*As a school we are happy to integrate them from September 2017*'; and '*Some head teachers will be ensuring that members of staff implement this immediately even if it is not the correct time for that personal member of staff*'. These comments serve to reinforce the concerns of the NASUWT and the need for clear and unequivocal guidance from the Welsh Government.

6. The Welsh Government indicated that it was hoped that the standard could be launched in September with the support of all key stakeholders, including the trade unions. The NASUWT asserted that, if agreement on the standards could be reached, there would be an expectation that any guidance on the application of the standard issued by the Welsh Government and all materials issued around the launch would be subject to consultation with the school workforce trade unions. The NASUWT was very clear that there would be an expectation that the Welsh Government would assist in 'policing' the application of the standards, especially but not exclusively, in relation to their use post Induction, and that there would be no attempt to argue that the Welsh Government could not get involved where issues arose. The NASUWT reminded the Welsh Government that these would be the Welsh Ministers' standards and fine word about how they should be applied would need to be backed up by support from the Welsh Government where they were being misused.
7. The NASUWT agreed to report back to the General Secretary to facilitate consideration of the position reached through the Union's democratic structures with a view to arranging a further meeting with the Welsh Government to discuss, as necessary, the issues raised above and any other outstanding issues that had not been covered in the meeting.

In terms of the next meeting and the outstanding issues, I believe we will need to discuss the following concerns which were raised in our response to the consultation:

- i. the potential for the misuse of the *Sustained highly effective practice* elements and descriptors as assessment tools for 'crossing the threshold' to the Upper Pay Spine (UPS) and/or as a 'job description' for teachers who have progressed to the UPS;
- ii. the provision of adequate funding and timetabled time for professional development/learning/reflection/research;
- iii. the reference in the consultation document that suggests that teachers have to '*...go the distance for their learners...*' to earn respect as professionals;
- iv. the potential for the standards to be used to over-ride the provisions in the STPCD in relation to the awarding of TLR payments;
- v. the language used and the construction of some of the descriptors, especially but not exclusively, those that suggest that teachers are able to '*ensure*' or '*secure*' certain learner outcomes and those that are

related directly to learner achievement, as this approach and construction is too closely aligned to 'inspection speak' and learner progress and achievement can be influenced by many factors that are outside the control of teachers and school leaders; and

- vi. the constant references to 'evidence' throughout the new standards which clearly presents the standards as an accountability framework rather than a means of promoting dialogue between professionals.

I trust that you will find this summary of the meeting both acceptable and useful.

The NASUWT looks forward to meeting with you again in the very near future.

Regards,

Rex

Rex Phillips
National Official Wales
029 2054 6080



BULLETIN

Performance Management and Your Pay 2017/18

The New Professional Standards for Teaching and Leadership

Although the performance management process has not changed, you may be aware that the Practising Teacher Standards (PTS) are to be replaced with new Professional Standards for Teaching and Leadership (the new standards).

The new standards will not become mandatory for teachers (other than newly qualified teachers starting induction in September 2017) until September 2018.

The NASUWT has expressed serious reservations about the construction and accessibility of the new professional standards and, although some progress has been made, members are strongly advised to resist any moves to apply the new standards to the 2017/18 performance management cycle.

The decision on whether or not to use the new standards for this year's PM cycle rests with individual teachers and cannot be imposed by schools.

The 2017/18 Performance Management Cycle

A review meeting must be held at or near the end of the current cycle to discuss the outcome of the process.

This meeting can be held at the same time as the planning meeting for the next cycle, but it must be a distinct and separate meeting and it must be held before the planning meeting for the next cycle.

You should not allow the review meeting for the current cycle and the planning meeting for the next cycle to be conflated.

You should not proceed with the planning meeting for the next cycle if you disagree with the outcome of the review meeting.

The Review Meeting

The primary purpose of the review meeting is to assess the extent to which you have met your objectives recorded on the planning record at the start of the cycle.

However, your appraiser is also required to: *'...provide to the head teacher a recommendation on pay progression, having regard to the school teacher's appraisal statement'*.^[1] This recommendation must be discussed at the review meeting and included in the Appraisal Statement.

If you disagree with the recommendation, you must ask your appraiser to record your concerns on the appraisal statement and indicate your intention to appeal the decision.

You should not discuss the matter further with either your appraiser or any member of the senior management team, including your headteacher.

You should not proceed with the planning meeting for the new cycle.

continued overleaf

The Planning Meeting

The planning meeting for the new cycle can take place immediately after the review meeting as long as you have accepted the outcome of the review meeting. The purpose of the planning meeting is to plan and prepare for the appraisal and to seek to agree your objectives with your appraiser.

If agreement cannot be reached, your appraiser is required to: '*...set out in writing such objectives as the appraiser considers appropriate...*' and you '*...may add comments in writing*'.^[2]

A record of the planning meeting must be produced by your appraiser. This document is confidential to you and your appraiser. It must include:

- your objectives;
- any training, development needs and resources required to assist you in meeting your objectives;
- the procedures for monitoring progress towards meeting your objectives;
- any comments you wish to make on any of these matters, if agreement has not been reached.

You should not agree to more than three objectives and these should not be subdivided into several parts.

You should not agree to the inclusion of numerical targets relating to pupil outcomes in your objectives, as this would present a system of 'payment by results' that has no place in the performance management process.

You should not agree to more than one lesson observation per term, with each observation lasting no more than one hour.

You should establish that the record of the planning meeting will remain confidential to you and your appraiser.

You should establish that your objectives will not be subject to veto by your headteacher.

The school's performance management policy and procedure should be in full compliance with the provisions of the NASUWT Cymru Performance Management/Appraisal Checklist, which is available via: www.nasuwt.org.uk/performancemanagement.

The NASUWT has produced a handbook for teachers on Performance Management/Appraisal which can be accessed and downloaded at www.nasuwt.org.uk/performancemanagement. Hard copies can be requested by contacting the NASUWT Cymru National Centre.

IF YOU HAVE ANY CONCERNS ABOUT THE ISSUES HIGHLIGHTED IN THIS BRIEFING



029 2054 6080

E-mail: rc-wales-cymru@mail.nasuwt.org.uk

^[1] The School Teacher Appraisal (Wales) Regulations 2011, regulation 31(3)

^[2] The School Teacher Appraisal (Wales) Regulations 2011, regulation 26(4)

Ymateb gan: NASUWT Atodiad E

Date:
Response from: NASUWT Appendix E

Your Ref: 24 August 2017

Our Ref: 170812 Greening J/CK/TF

NASUWT

The Teachers' Union

Hillscourt Education Centre
Rose Hill
Rednal
Birmingham
B45 8RS

General Secretary
Chris Keates (Ms)

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Facsimile: 0121 457 6208

E-mail: nasuwt@mail.nasuwt.org.uk Website: www.nasuwt.org.uk

Rt Hon Justine Greening MP
Secretary of State
Department for Education
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Dear Justine

The 27th School Teachers' Review Body Report and the 2017 School Teachers' Pay and Conditions Document

I wrote to you in August 2016 to express concerns about the process adopted by the DfE for incorporating the School Teachers' Review Body's (STRB) recommendations into the School Teachers' Pay and Conditions Document (STPCD) and for managing the consultation on changes to the STPCD.

One of the NASUWT's key concerns raised at that time was the decision taken by the DfE to remove from the 2016 STPCD the Wales Education Workforce Council (EWC) fee allowance, despite the STRB's recommendation that this should be retained in the 2016 STPCD. The DfE's removal of the EWC fee allowance occurred after correspondence was received from the Welsh Government on the issue and it was not the subject of consultation with statutory consultees.

It is with regret, therefore, that I have to write to you again this year to express further concerns about a significant change made by the DfE to the 2017 STPCD in respect of provisions applying to teachers in Wales, without consultation with statutory consultees. This concern relates to the removal of the Practising Teacher Standards (Wales) from Annex 1 of the STPCD and the addition of a section on the new professional standards for teaching and leadership (Wales).

This change was not included in the July 2017 draft STPCD which was issued to statutory consultees. Furthermore, the DfE did not even provide an alert to the this significant change when the final version of the STPCD was issued on 10 August 2017.

You should be aware that the new professional standards for teaching and leadership in Wales are not applicable to the majority of teachers in Wales during 2017/18 and do not become the relevant teachers' standards for them until 1 September 2018. The new professional standards for teaching and learning are applicable only to newly qualified teachers (NQTs) who began their induction on or after 1 September 2017. The wording in the 2017 STPCD states that '*all post-induction teachers will move to the new standards by 1 September 2018.*' This is fundamentally incorrect as the implementation schedule for the new standards

means that 'all post-induction teachers' will move to the new standards on 1 September 2018.

I am sure that you will appreciate, therefore, why there was a need for consultation on the STPCD before its final publication and the implications of a failure to do so. The consultation process is a vital aspect of ensuring that not only the STRB's recommendations are accurately translated into changes to the STPCD but also to ensure that any significant other changes to the STPCD being proposed by the DfE are subject to consultation. The way in which this matter has been addressed calls into question the integrity of the process of consultation on the STPCD.

The STRB did not recommend the removal of the Practising Teacher Standards (Wales) from the 2017 STPCD, or the inclusion of the professional standards for teaching and leadership. The DfE did not highlight to consultees at any stage that this change was being proposed. I therefore request as a matter of urgency answers to the following questions.

- Why the change was made and at whose request?
- On what date did the DfE decide that a change should be made to the section on professional standards?
- Why was this significant change not notified to statutory consultees either before or at the time of the issuing of the final version of the STPCD?

I also request that a formal, full and urgent consultation is now carried out on the change and that statutory consultees are issued with details of the reasons for the change being made, including any submissions or representations made by the Welsh Government to the DfE relevant to this issue.

The inaccuracy in the STPCD which I have highlighted above needs to be addressed immediately. The NASUWT requests that DfE, which has the responsibility for the STPCD, issues clarification that the new professional standards for teaching and leadership (Wales) only apply on a mandatory basis to NQTs during the 2017/18 School Year and not to any other teachers, to make clear that schools should not seek to impose on them the new professional standards for teaching and learning. The NASUWT acknowledges that this clarification may need to be issued via the Welsh Government.

Pending your response, the NASUWT will be seeking legal counsel's opinion on the manner in which the consultation of the statutory provisions of the STPCD has been managed this year.

I would appreciate your urgent attention to the issue I have raised which, if unaddressed, will undoubtedly cause considerable difficulties during the new academic year.

Yours sincerely,



Chris Keates (Ms)
General Secretary

Kirsty Williams AM
Cabinet Secretary for Education
Welsh Government
Ty Hywel
Cardiff Bay
Cardiff
CF99 1NA

24 August 2017

170824/WILLIAMS K/CK/TF

Dear Kirsty

The 27th School Teachers' Review Body Report and the 2017 School Teachers' Pay and Conditions Document England and Wales

On receipt, from the Westminster Department for Education (DfE), of the final version of the 2017 School Teachers' Pay and Conditions Document (STPCD) for England and Wales, the NASUWT noted, with concern, the removal of the Practising Teachers' Standards (Wales) from the STPCD and their replacement with a new section referencing the new professional standards for teaching and leadership (Wales).

I have written to the Westminster Secretary of State for Education to express the NASUWT's concern that the DfE has made this significant change in respect of provisions applying to teachers in Wales, without including the proposed change in the draft 2017 STPCD issued for consultation to statutory consultees. I have asked her to address this situation as a matter of urgency.

You are aware, of course, the new professional standards for teaching and leadership in Wales only became the relevant teachers' standards for the majority of teachers in Wales on 1 September 2018. The new professional standards for teaching and learning are applicable only to newly qualified teachers (NQTs) who began their induction on, or after, 1 September 2017. The wording in the amended section of the 2017 STPCD states that '*all post-induction teachers will move to the new standards by 1 September 2018*'. This is fundamentally incorrect, as the implementation schedule for the new standards means that 'all post-induction teachers' will move to the new standards **on** 1 September 2018.

The STRB did not recommend the removal of the Practising Teachers' Standards (Wales) from the 2017 STPCD, or the inclusion of the professional standards for teaching and leadership. It was not part of its remit and it is not a consequential change of STRB recommendations.

This change, made without consultation, has the potential to cause concern and confusion in the new academic year. It would have been inappropriate for the DfE to have made such a significant change without input from the Welsh Government and I would be grateful, therefore, if you would provide information on the reason for this change to the STPCD at this late stage, including any submission or representations made by the Welsh Government to the Westminster Government on this matter.

As the Westminster DfE has responsibility for the 2017 STPCD, the NASUWT has requested that there should be urgent consultation on the change with statutory consultees and that clarification should be issued correcting the misleading information that the new professional standards apply to teachers other than NQTs before 1 September 2018. I have acknowledged to the Westminster Secretary of State that this would need to be in consultation with the Welsh Government.

The NASUWT believes that, in order to avoid confusion in schools, it will be important for the Welsh Government to issue clarification that the new professional standards for teaching and leadership (Wales) only apply on a mandatory basis to NQTs during the 2017/18 School Year and not to other teachers. The Welsh Government will also need to make clear the commitment given during the consultation that any decision to move onto the new standards by other teachers before they become mandatory from 1 September 2018, will be for teachers to take on an individual basis and that schools cannot seek to impose the standards before 1 September 2018.

Thank you in anticipation of your co-operation.

Best wishes.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chris', with a horizontal line underneath the name.

Chris Keates (Ms)
General Secretary

Cynulliad Cenedlaethol Cymru | National Assembly for Wales

Y Pwyllgor Plant, Pobl Ifanc ac Addysg | Children, Young People and Education Committee

Ymchwiliad i Addysg a Dysgu Proffesiynol Athrawon – Gwybodaeth Bellach | Inquiry into Teachers' Professional Learning and Education – Further Information

TT FI 07

Ymateb gan: Estyn

Response from: Estyn

1. Yr amserlen weithredu arfaethedig; a fydd gan athrawon ledled Cymru yr amser a'r adnoddau angenrheidiol i allu cyd-fynd go iawn â disgrifiadau'r Safonau newydd erbyn Medi 2018?

Dylai ysgolion ddechrau gweithio ar y safonau hyn cyn gynted â phosibl, gan fod uchelgais y safonau, sef cefnogi twf pob gweithiwr addysg proffesiynol, yn gywir ac er lles pennaf dysgwyr.

Nid yw hi'r tu hwnt i allu ysgolion a'r system addysg i ddechrau gweithredu'r safonau o Fedi 2018 ymlaen, ond bydd angen cymorth sylweddol ar ysgolion yn y tymor byr, canol a hir er mwyn defnyddio'r safonau'n llwyddiannus, gan ei bod hi'n gyfnod o newid sylweddol mewn addysg yng Nghymru. Fodd bynnag, mae ansawdd y cymorth gan gonsortia rhanbarthol, er enghraifft yn ymwneud â datblygu arweinyddiaeth, wedi amrywio yn y gorffennol.

Yn benodol, bydd yn her sylweddol i sicrhau bod pob ysgol yn defnyddio'r safonau cystal â'i gilydd. Nid oes gennym hanes cadarn o sicrhau bod pob ysgol yn defnyddio safonau arweinyddiaeth blaenorol yn llwyddiannus ac yn gyson. Yn ein cyhoeddiad 'Defnydd statudol o safonau arweinyddiaeth wrth reoli perfformiad penaethiaid' (Estyn, Tachwedd 2015), dywedom mai 'y chydig iawn o'r paneli arfarnu sy'n defnyddio'r safonau arweinyddiaeth yn effeithiol i arfarnu perfformiad y pennaeth.'

Mae geiriad llawer o ddangosyddion y safonau yn cyflwyno her i weithwyr proffesiynol o ran eu dehongli'n gyson. Mae'n bosibl na fydd perfformiad yr ystyrir ei fod yn cyfateb i ddisgrifiad mewn un lleoliad yn cyfateb mewn lleoliad arall. Mae perygl y gallai ysgolion ddatblygu eu rhestr gwirio eu hunain o ystyr y safonau oherwydd y diffyg eglurder hwn. Yn ogystal, er y bydd y safonau hyn yn cael eu cyflwyno yn 2018, mae angen i ni gydnabod na fydd y cwricwlwm newydd y cyfeiriant ato yn statudol tan 2021/2022. Mae'n allweddol bod y safonau'n cael eu hystyried yn safonau sy'n ategu diwygio ac na fyddant yn dasg ychwanegol sy'n rhwystro ysgolion rhag ymhél â diwygio'r cwricwlwm.

Yn gryno, bydd effeithiolrwydd a chysondeb ysgolion wrth ddefnyddio'r safonau newydd yn dibynnu ar ansawdd y cymorth a'r arweiniad gan Lywodraeth Cymru a'r consortia rhanbarthol, yn enwedig i benaethiaid.

Mae gan ysgolion y gallu i ddechrau ystyried y pum safon gyffredinol fel sylfaen ar gyfer arfarnu a gwella perfformiad proffesiynol, ond mae'n anodd gwarantu y bydd pob ysgol mewn sefyllfa i gyd-fynd go iawn â'r disgrifiadau erbyn Medi 2018. Mae'n debygol o gymryd cryn amser i fesurau sydd yr un mor effeithiol fod ar waith ar draws Cymru i sicrhau bod ysgolion yn cydymffurfio â'r safonau newydd ac arfarnu p'un a yw ysgolion yn defnyddio'r safonau yn dda.

2. A oes digon o gymorth a hyfforddiant ar gael, neu'n debygol o fod ar gael, er mwyn helpu athrawon i bontio i'r safonau newydd?

Mae'n anodd i Estyn ateb y cwestiwn hwn gan nad ydym yn gwybod am unrhyw gynlluniau hyfforddi neu ddatblygu arfaethedig. Fodd bynnag, fel y dywedwyd yn gynt, nid yw ysgolion bob amser wedi ymhél yn effeithiol â safonau proffesiynol blaenorol ac mae gallu consortia rhanbarthol i hyfforddi a chefnogi athrawon ac arweinwyr ysgol yn amrywio, ac efallai nad yw'n gyson ar hyd a lled Cymru.

3. A ydych chi'n rhagweld unrhyw bwysau adnoddau ychwanegol ar eich gwaith o ganlyniad i'r safonau newydd?

Nid ydym yn rhagweld unrhyw bwysau arwyddocaol ar Estyn o ran adnoddau ychwanegol o ganlyniad i'r safonau newydd.

Bydd rhywfaint o ofynion hyfforddiant i holl Arolygwyr Ei Mawrhydi. Er enghraifft, bydd angen i bob arolygydd fod yn gyfarwydd â'r safonau newydd a'u goblygiadau i weithwyr proffesiynol sy'n gweithio ym myd addysg.

Byddwn yn neilltuo adnoddau ac arbenigedd proffesiynol i arfarnu'r gwaith o gyflwyno'r safonau proffesiynol newydd a'u heffeithiolrwydd. Byddwn yn parhau i arolygu effaith datblygiad proffesiynol athrawon ac arweinwyr mewn arolygiadau ysgol. Bydd hyn yn cynnwys ystyried y defnydd o unrhyw safonau proffesiynol newydd. Bydd arolygwyr yn ystyried pa mor dda mae ysgolion yn defnyddio safonau proffesiynol i gefnogi twf proffesiynol, er enghraifft o dan faes arolygu 5, arweinyddiaeth a rheolaeth.

Cynulliad Cenedlaethol Cymru | National Assembly for Wales

Y Pwyllgor Plant, Pobl Ifanc ac Addysg | Children, Young People and Education Committee

Ymchwiliad i Addysg a Dysgu Proffesiynol Athrawon – Gwybodaeth Bellach | Inquiry into Teachers' Professional Learning and Education – Further Information

TT FI 08

Ymateb gan: Michael Waters

Response from: Michael Waters

Please go to <http://learning.gov.wales/docs/learningwales/publications/170901-professional-standards-for-teaching-and-leadership-en.pdf> in order to explore the standards and to read the background and public consultation documentation. The following bullet points are offered as a very brief summary.

The new standards have been produced by working groups and trialled in schools across Wales with very positive response.

There are five standards: pedagogy, collaboration, professional learning, innovation and leadership.

There is an overarching set of values and dispositions that apply to all professionals.

These five standards apply to all teachers and to those in a formal leadership role (e.g. head teacher, deputy, assistant, head of department/ phase).

The standards for leadership are at two levels: new to the role and sustained effective practice.

The majority of professionals in schools are teachers, and it is crucial that we define their roles in ways that can help lead to the successful reform of education in Wales.

For teachers, the standards are described at two levels: sustained effective practice and career entry.

There are several descriptors for each standard (32 in total across the 5 standards) that exemplify the standard.

At career entry level, the detailed descriptors serve as a basis for consideration of effectiveness, the award of Qualified Teacher Status and to help ensure sufficient development through a teacher's induction period. Teacher must satisfy the five standards, and demonstrate their effectiveness in all descriptors to be allowed to enter the profession.

Beyond career entry level, it assumes that the teacher is effective and the ambition is to use the standards to enable professional growth.

The descriptors serve as the basis for professional discussion with supervisors and peers about progress as a professional.

Where there are concerns about the performance of a teacher or leader, the descriptors could serve to help pinpoint possible shortcomings where the expected

standard is not being met and can help provide the building blocks needed to help to remedy such shortcomings.

The descriptors link with each other across the five standards to address the complexity of teaching and leadership. They are not meant to be visited 'in order'.

Teachers and leaders are urged to use the Professional Learning Passport (developed by the Education Workforce Council) as a vehicle for recording their professional growth.

The standards are provided on a web platform to encourage professional conversations. These conversations can be assisted by ensuring that the teacher has the knowledge of what sustained effective practice looks like.

Examples of good practice will gradually be included upon the web platform to exemplify aspects of descriptors – it has been a clear ambition from the outset that the standards should encourage growth and development.

A range of examples of professional standards from other countries and jurisdictions were considered as background to the development in Wales.

The OECD has recognised the standards as a positive development in their report of published in the spring of 2017.

The response of professional associations to the new standards is mixed though individual meetings with secretaries following the formal consultation have been productive in the main.

The standards are one aspect of the wider efforts being made by the Government to improve outcomes in schools, alongside reforms in curriculum and qualifications, Initial Teacher Education, professional learning and the development of the National Academy for Educational Leadership, the development of a self-improving education system and changes to the way pupils with additional learning needs are supported. As such the standards are integral to the reform agenda.

The standards are an important part of the drive to build a self-improving school system with collaboration across the profession as a central tenet. They are not expected to increase workload but are intended to raise the curiosity, insight and endeavour of professionals, and the expectation that professionals collaborate for the benefit of the learner, and hopefully the teacher.

The standards are intended to promote a culture of challenge, support and growth with an emphasis upon high level performance to the benefit of each pupil and to Wales.

Cynulliad Cenedlaethol Cymru | National Assembly for Wales

Y Pwyllgor Plant, Pobl Ifanc ac Addysg | Children, Young People and Education Committee

Ymchwiliad i Addysg a Dysgu Proffesiynol Athrawon – Gwybodaeth Bellach | Inquiry into Teachers' Professional Learning and Education – Further Information

TT FI 09

Ymateb gan: Undeb cenedlaethol athrawon cymru

Response from: Undeb cenedlaethol athrawon cymru (only available in Welsh)

Safonau Proffesiynol newydd: tystiolaeth i'r Pwyllgor Plant, Pobl Ifanc ac Addysg

Gwerthfawrogwn y cyfle i ymateb i gais y pwyllgor am wybodaeth fwy penodol am y safonau proffesiynol newydd o fewn cyd-destun yr Ymchwiliad i Addysg a Dysgu Proffesiynol Athrawon. Mae UCAC yn barod iawn i gynnig gwybodaeth neu dystiolaeth bellach, ar lafar neu'n ysgrifenedig, petai hynny o gymorth i'r pwyllgor.

Atebwn gwestiynau penodol y pwyllgor yn gyntaf, cyn mynd ymlaen i godi rhai pwyntiau eraill.

Yr amserlen weithredu arfaethedig; a fydd gan athrawon ledled Cymru yr amser a'r adnoddau angenrheidiol i allu gwir gyflawni yr hyn a ddisgrifir yn y Safonau newydd erbyn mis Medi 2018?

- **Athrawon Newydd Gymhwyso (ANG)**

Mae'r amserlen ar gyfer ANGiaid yn amlwg yn gyflymach nag ar gyfer unrhyw grŵp arall, gyda'r safonau'n weithredol o nawr ymlaen (mis Medi 2017).

Ar y cyfan, mae UCAC yn cytuno ag egwyddor yr amserlen gyflym. Ni fyddai'n synhwyrol i'r grŵp hwn o athrawon ddechrau'u cyfnod yn y gweithlu gan ddefnyddio set o safonau sydd ar fin darfod. Byddai'r broses o ymgyswrtio ag un set, ac wedyn trosglwyddo o fewn y flwyddyn i set wahanol yn golygu ymdrech a dryswch diangen.

Yn ogystal, mae'n debygol y bydd nifer o ysgolion yn defnyddio'r flwyddyn 2017-18 fel cyfle i ymgyswrtio â'r safonau newydd, ac i drosglwyddo'n raddol iddynt, felly, unwaith eto, ni fyddai'n ddymunol bod yr ANGiaid yn gaeth i'r hen drefn.

Yn wir, mi allai'r ffaith o gael athrawon ifanc o fewn yr ysgol (a'u mentoriaid) sy'n defnyddio'r safonau newydd hwyluso'r broses o ymgyswrtio a throsglwyddo i weddill y staff, yn enwedig os byddant wedi derbyn hyfforddiant penodol.

Wedi dweud hynny, rhaid bod yn ymwybodol fod yr amserlen hon yn uchelgeisiol mewn perthynas ag amserlen cyhoeddi'r safonau terfynol. Nodwn nad yw'r bwlch amser rhwng y cyhoeddi a'r cyflwyno'n ddelfrydol o bell ffordd mewn perthynas ag ANGiaid. Bydd hyn yn rhoi pwysau sylweddol ar fentoriaid ymsefydlu (o fewn ysgolion) yn arbennig.

Gan fod disgwyliad ar ysgolion i weithredu'r safonau newydd yn syth ar gyfer ANGiaid, hyderwn y bydd y sawl sy'n gosod yr amserlen, ynghyd â sefydliadau cenedlaethol a rhanbarthol eraill, yn cadw eu hochr hwythau o'r fargen ac yn darparu'r elfennau hanfodol canlynol yn unol â'r amserlen sydd wedi'i gosod, hynny yw o 4 Medi ymlaen:

- Proffil Dechrau Gyrfa/Proffil Ymsefydlu Statudol/Pasbort Dysgu
 - Proffesiynol wedi'u diweddarau at y diben ar wefan Cyngor y Gweithlu Addysg
 - canllawiau clir a deunydd cefnogi ynghylch sut i ddefnyddio'r safonau newydd
 - hyfforddiant digonol, i fentoriaid (mentoriaid ymsefydlu o fewn yr ysgolion, a gwirwyr allanol o fewn y consortia rhanbarthol), arweinwyr ysgol (sy'n goruchwylio'r broses ymsefydlu), ac i lywodraethwyr (sydd â'r cyfrifoldeb o ddyfarnu a yw'r ANG wedi cwblhau'r cyfnod ymsefydlu'n foddhaol); mae hyn yn bwysicach byth o ystyried mai dyma fydd y cysylltiad uniongyrchol cyntaf y caiff llawer o ysgolion gyda'r safonau newydd
 - bod popeth ar gael yn y ddwy iaith o'r cychwyn cyntaf
- **Athrawon o fewn y gweithlu**

Mae UCAC yn cyd-fynd â'r amserlen ar gyfer athrawon o fewn y gweithlu, sy'n neilltuo'r flwyddyn ysgol 2017-18 ar gyfer ymgyfarwyddo a dechrau ar y gwaith o drosglwyddo, gyda chychwyn ffurfiol, gorfodol ym mlwyddyn ysgol 2018-19. Mae hynny'n amserlen resymol a realistig ym marn yr undeb.

Rydym yn gwbl gyffyrddus â'r ymagwedd hyblyg o ran amserlen at ddechrau gweithredu'r safonau newydd o fewn y 12 mis nesaf, gan roi cyfrifoldeb/rhyddid i ysgolion (ac athrawon unigol) bennu'r amserlen sy'n gweddu orau i'w trefniadau mewnol nhw, yn dibynnu ar gylchoedd Rheoli Perfformiad, amser i baratoi a chael hyfforddiant digonol, ac ati.

Mi fydd yn hollbwysig bod pawb sy'n gorfod defnyddio'r safonau newydd yn cael cyfle i ymgyfarwyddo â nhw, ac i fagu hyder yn y dulliau newydd o'u defnyddio. Gan fod pwyslais newydd ar gymryd cyfrifoldeb personol dros ddysgu proffesiynol, mi fydd ymdeimlad o hyder unigol yn anhepgorol i'r math o ymreolaeth a fwriedir.

Nid ydym yn cyd-fynd â'r awgrym gan rai yn ystod yr ymgynghoriad y dylid aros am gyflwyniad y cwricwlwm newydd er mwyn cyflwyno'r safonau newydd. Oes, mae perthynas rhwng y ddau beth, ac mae hynny i'w

groesawu'n fawr; mae UCAC wedi bod yn pwysu am ddatblygiadau polisi mwy cydlynol ers blynyddoedd, ac rydym yn teimlo bod hynny ar waith ar hyn o bryd mewn ffordd na welwyd ers blynyddoedd lawer. Ond nid yw hynny o reidrwydd yn golygu cyflwyno popeth ar yr un pryd. Teimlwn fod cyflwyno newidiadau yn bwylllog ac yn drefnus dros gyfnod yn gosod disgwyliad llawer fwy rhesymol a realistig ar ysgolion a'r gweithlu, yn enwedig os yw un cam yn paratoi'r tir ar gyfer y cam nesaf - fel y credwn sy'n wir yn yr achos hwn.

- **Addysg Gychwynnol i Athrawon**

Yr amserlen mewn perthynas â chyrsgiau addysg gychwynnol i athrawon sy'n peri'r fwyaf o bryder i UCAC.

Teimlwn fod cychwyn gorfodol o fis Medi 2019 yn llawer rhy hwyr mewn perthynas â'r amserlen ar gyfer gweddill y gweithlu. Hyd yn oed gyda chyrsgiau TAR, sy'n para blwyddyn yn unig, bydd ANGiaid yn ymuno â'r gweithlu ym mis Medi 2020 sydd wedi bod yn gweithio yn erbyn yr hen safonau, ac yn gorfod newid i'r safonau newydd a hynny *dair blynedd gyfan* wedi i'r ANGiaid cyntaf drosglwyddo i'r safonau newydd. Yng nghyd-destun cyrsiau BAdd, gallant fod yn ymuno â'r gweithlu yn 2022 - *pum mlynedd yn hwyrach* na'r ANGiaid cyntaf.

Mae UCAC yn deall mai'r broses o ddiwygio addysg gychwynnol i athrawon sydd wrth wraidd y penderfyniad ynghylch yr amserlen. Ond ni allwn ond teimlo y dylai fod yn bosib gosod amserlen sy'n gofyn am gyflwyno'r safonau ynghynt yn y broses.

Yn y bôn nid yw'n rhesymegol i gynhyrchu a darparu ANGiaid sydd ar eu hôl hi mewn perthynas â'r safonau (nac mewn perthynas ag unrhyw ddiwygiad arall i'r system addysg) o'u cymharu ag athrawon sydd eisoes yn y gweithlu. Mae addysg gychwynnol, yn ei hanfod, yn gyfle i ddarparu athrawon newydd i'r gweithlu sydd â dealltwriaeth hollol gyfredol o ofynion system addysg Cymru. Mi fyddai, nid yn unig, yn gyfle wedi'i gollu i'w trwytho yn y system newydd, ond yn ogystal, yn creu gwaith diangen i'r ANGiaid eu hunain ac i'w mentoriaid wrth geisio trosglwyddo i'r system newydd, a hynny yn ystod blwyddyn brysur, drwm a dwys iawn.

Gwyddom fod Llywodraeth Cymru, mewn ymateb i'r ymgynghoriad cyhoeddus, wedi cytuno i "weithio gyda'r sector addysg gychwynnol i athrawon i edrych ar y posibilrwydd o symud i'r safonau newydd o fis Medi 2018, cyn iddynt fod yn gymwys yn ffurfiol o fis Medi 2019."

Fodd bynnag, teimlwn yn gryf bod hynny hyd yn oed yn rhy araf, a bod angen i gyrsgiau addysg gychwynnol i athrawon gymhathu'r safonau newydd cyn gynted ag sy'n rhesymol bosib (yr un amserlen ag ysgolion - blwyddyn 2017-18 i bontio, a blwyddyn 2018-19 i gyflwyno'n orfodol?), er mwyn i fyfyrwyr dan hyfforddiant ac ANGiaid ymuno â'r gweithlu gyda'r wybodaeth ddiweddaraf.

Awgryma UCAC y dylai bod yna ddyddiad penodol ar gyfer y gweithlu cyfan pan mae'r hen safonau'n darfod.

A oes, neu a yw'n debygol y bydd, digon o gefnogaeth a hyfforddiant i helpu athrawon i drosglwyddo i'r safonau newydd?

Er mwyn trosglwyddo i'r safonau newydd, ac er mwyn i'r trosglwyddiad fod yn esmwyth ac i'r drefn newydd weithio fel y rhagwelir, bydd nifer o elfennau'n angenrheidiol:

- canllawiau clir ynghylch sut i'w defnyddio, gan gynnwys sut i beidio â'u defnyddio
- cyfathrebu clir a chyson *o bob cyfeiriad a phob lefel* ynghylch sut i ddefnyddio/peidio â defnyddio'r safonau
- hyfforddiant, gan gynnwys ar gyfer arweinwyr ysgol, llywodraethwyr ac ymgynghorwyr her y consortia rhanbarthol
- gofod digonol, o ran amser yn arbennig, i ymarferwyr gael myfyrio ar y safonau, cyd-drafod a chydweithio i rannu a datblygu sgiliau; dylid sicrhau fod amser cyson wedi'i neilltuo at y pwrpas

Mae'r pwyntiau uchod yn amlygu'r manau gwan posib wrth weithredu'r drefn a'r ethos newydd. Hynny yw, mi fyddai unrhyw ddiffygion o ran canllawiau clir a negeseuon cyson yn siŵr o arwain at gamddealltwriaethau a chamddefnydd o'r safonau newydd. Rydym, fel undeb, wedi gweld enghreifftiau o hyn mewn perthynas â meysydd polisi eraill (ac yn wir, mewn perthynas â'r Safonau Athrawon wrth eu Gwaith). Rhaid bod yn arbennig o ofalus bod ymgynghorwyr her y consortia rhanbarthol yn gyson ac yn gywir eu pwyslais wrth gyfathrebu gydag ysgolion ynghylch y safonau newydd.

Mae llywodraethwyr yn aml yn mynd yn angof, ond bydd sicrhau fod ganddynt ddealltwriaeth gywir a thrylwyr o'r safonau newydd a'r ffordd y dylid eu gweithredu yn hanfodol ar gyfer gweithredu effeithiol.

Un o'r bygythiadau pennaf y rhagwelwn yw diffyg amser digonol ar gyfer y math o fyfyrion a chyd-drafod sy'n greiddiol i weledigaeth y drefn newydd. Mae hyn yr un mor wir, os nad yn fwy felly, ar gyfer y safonau arweinyddol ffurfiol. Efallai y caiff hyn ei wau mewn i drefniadau'r cwricwlwm newydd, ond ni welwn ar hyn o bryd ble a phryd bydd modd i ymarferwyr cael y gofod syniadaethol angenrheidiol yng nghanol y gofynion dydd-i-ddydd gwbl lethol.

Materion eraill

- **Rheoli Perfformiad**
Un mater ble fydd angen gofal arbennig o ran canllawiau a negeseuon yw'r cydberthynas – os oes 'na gydberthynas – rhwng y safonau newydd a'r drefn Rheoli Perfformiad. Mae peryglon o gamddealltwriaeth a chamddefnydd sylweddol yn y maes hwn, ac am y rheswm hynny, rhaid gochel rhag unrhyw amwysedd. Mae hyn yn wir am brosesau Medruswydd yn ogystal.

- **Addysg Bellach**

Er ein bod ni'n deall y rhesymau am fynd ar drywydd gwahanol o ran datblygu'r safonau proffesiynol ar gyfer y gweithlu addysg bellach (AB) a dysgu seiliedig ar waith (DSW), teimlwn fod cyfle wedi'i golli o ran gwneud ymgais i ddod o hyd i'r egwyddorion/arferion/gwerthoedd cyffredin. Rhagwelwn y gallai anawsterau ymarferol godi yn sgil y broses datblygu a'r ymagwedd wahanol. Er enghraifft, mae'r safonau ar gyfer athrawon ysgol yn berthnasol i drothwyon Statws Athro Cymwysedig (SAC/QTS) ac Athro Newydd Gymhwys (ANG); nid yw'n debygol y bydd yr un peth yn wir yn achos y safonau AB/DSW. Bydd angen ystyried beth yw'r safonau y bydd myfyrwyr ar gyrsiau TAR (AB) a chysiau eraill cyfatebol yn gorfod cwrdd â nhw. Mae'n anodd osgoi'r casgliad bod angen cyfatebiaeth o ryw fath rhwng y safonau ar gyfer myfyrwyr TAR, boed yn TAR 'ysgol' neu AB.

- **Geiriad**

Er bod geiriad y safonau newydd wedi'u mireinio dros gyfnod, a hynny mewn ymgynghoriad â'r gweithlu, rydym yn parhau i bryderu fod *ambell un* o'r safonau wedi'u geirio mewn ffordd astrus, a fydd yn peri anawsterau wrth geisio dehongli a gweithredu; maent fel petai'n ceisio cymhathu gormod mewn un frawddeg ,

- Enghraifft 1: Mae'r athro'n deall pwysigrwydd yr amgylchedd dysgu yn y gwaith o hyrwyddo arferion ac ymddygiadau dysgu cadarnhaol sy'n cyd-fynd â'r pedwar diben ac y mae dysgwyr yn eu deall yn y cyd-destun hwnnw. Mae felly'n mynd ati i'w ymsefydlu a'i reoli'n effeithiol ac yn barhaus.
- Enghraifft 2: Mae dysgwyr yn cael eu galluogi i ddeall sut mae eu ffocws ar les personol a'u hysgogiad ar gyfer canlyniad, cyfrwng ac ansawdd priodol yn cael effaith o ran defnyddioldeb at y diben a'r gynulleidfa.

- **Y Gymraeg**

Bydd angen cadw golwg ar ba mor effeithiol yw'r disgrifydd ynghylch sgiliau yn y Gymraeg; nid yw UCAC wedi'i ddarbwylllo'i fod yn ddigon cadarn o ystyried yr angen i Gymreigio gweithlu'n gyflym iawn i fodloni'r gofynion presennol heblaw am y diwygiadau sydd ar y ffordd

Yn rhinwedd paragraff(au) vi o Reol Sefydlog 17.42

Mae cyfyngiadau ar y ddogfen hon

Cynulliad Cenedlaethol Cymru | National Assembly for Wales

Y Pwyllgor Plant, Pobl Ifanc ac Addysg | Children, Young People and Education Committee

Ymchwiliad i Addysg a Dysgu Proffesiynol Athrawon – Gwybodaeth Bellach | Inquiry into Teachers' Professional Learning and Education – Further Information

TT FI 10

Ymateb gan: Consortia Gwella Ysgolion Rhanbarthol

Response from: Regional School Improvement Consortia

The four regions presented to the committee last in relation to progress with Successful Futures and curriculum reform. Since that date the joint work we have done between ourselves and with Welsh Government has led to improvements and greater confidence. Further continued work is required, nevertheless, this is now building on a far clearer footing and with an improved momentum.

Improvements include

1. Improved communication
2. Greater Clarity on the changes, and the scale of these changes
3. Improved collaboration and joint understanding of key partners engaged in the programme
4. A move towards making clearer links between different aspects of the change programme – eg. Teacher standards and curriculum, assessment and performance measures
5. Common Professional Learning offer, specifically now for leadership and developing for all workforce including support staff
6. Increased focus on, and clarity on roles, and accountabilities

1 IMPROVED COMMUNICATION

Since January

- The role of Change Board to facilitate work from a range of stakeholders has led to a quicker pace on key projects. Eg reducing teacher workload and supporting the AoLE development.
- Workshop days with WG colleagues to build their understanding of how schools and regions work, and specifically how change needs to be put in context for schools.

Post September

- Align the communication of all key organisations to ensure a single message to all stakeholders.

2 GREATER CLARITY

Since January

- Appointed joint regional consortia and WG identified leads for each Area of Learning and Experience (AoLE) group to work in partnership. This has provided clear joint leadership to the design and development process.
- Provided opportunities for AoLE leads to share progress and thinking with each other in order to triangulate developments and identify similarities.
- Provided clarity regarding the roles and expectations of pioneer schools and practitioners. Agreed national standards – regional implementation
- Clarified role of Welsh Gov and Consortia to deliver this agenda
- Produced core brief to all pioneers to provide clarity regarding what is required in strand 2
- Held a national event to draw together the work of curriculum and professional learning pioneer schools.

Post September

- Consortia have a key role in the next academic year:

Keeping all schools informed with developments and discussing implications of developments

Assessing the readiness of all schools to deliver and preparing packages of support to support all schools.

Ensuring pioneer schools engage with their networks of schools to support the development of the new curriculum throughout the system.

- WG/Consortia develop new core brief to provide clarity regarding the purpose of the next strand of work (strand 3) and to include in the new brief the role of key organisations such as Estyn and Qualifications Wales in supporting the agenda.

- All regions are using clusters or networks of schools as mechanism to cascade key messages. These will be critical in ensuring the delivery of consistent messages to all teachers.

3 IMPROVED COLLABORATION

Since January

- Jointly Agreed a core brief for all AoLE groups which outlined the tasks that needed to be completed by the end of the last academic year
- Jointly monitored the progress of AoLEs and intervened as and when necessary
- Developed a structured regular meetings cycle with all AoLE leads from WG and consortia to:
 - o Review output from each workshop
 - o Plan future workshops
 - o Discuss progress/issues/challenges
 - o Share lessons learned
- **Held a national pioneer conference on 10 -11 July 2017** which was the first time that practitioners from the three pioneer strands (digital, professional learning and curriculum development) came together to examine and reflect upon the output of the 6 AoLE groups
- **Change management training held for consortia, WG and AoLE leads to support the professional development of teams to lead the change required**

Post September

Increase cross AoLE working (e.g. Science and Technology and Health and Well- being have begun to discuss overlaps)

4 CLEARER LINKS AND PROGRESS (Moving forward)

Since January

There is increased understanding between all parties of the hurdles to progress, with arrangements for solutions to be discussed and actioned.

In addition, links are being made between aspects of the national change programme, that were previously isolated

Curriculum and Assessment are being developed together, the University of Wales Trinity Saint David and the University of Glasgow are working directly with Pioneer Schools as part of AoLE development. They will support pioneer schools to build evidence based learning progression frameworks and to develop achievement outcomes for the progression reference points. This work will involve talking to learners directly to capture their reflections of their own progression in learning and will also be rooted in teachers' actual experience of progression in learning.

All AoLE groups also make use of members of the Curriculum and Assessment Group and other national groups.

The Independent Advisory Group, chaired by Professor Graham Donaldson, has also reviewed progress to date and shared its thoughts on progress.

From September

- Building on the work of strand 1 and strand 2, in September, the AoLE leads from WG and consortia are coming together with Professor Mark Priestly to:
 - **form a single set of recommendations for the AoLE groups** based on the strand 1 reports and considering the strand 2 proposals to date.
 - ensure a **consistency in understanding between the AoLE leads in relation to the 'big ideas'/what matters approach** and facilitate discussion around the level of flexibility that the approach could offer for it to be meaningful for all AoLEs, and appropriate for learners in Wales.
 - **Confirm what should be included in the framework to ensure clarity and consistency**
- Provide clear expectations for all AoLE workshops in the Autumn term

5 Professional Learning

Since January

- ***Developing the National Approach to Professional Learning.*** The four consortia have **worked in partnership with pioneers** to develop a National Approach to Professional Learning, specifically linking Career Development Pathway milestones. This approach will ensure

that practitioners have access to equitable provision throughout their career continuum.

- **OECD Pilot Group – *Schools as Learning Organisations (SLO)*** supporting the self improving system, informed by international research. Reflective tools are currently being field tested and WG is working with OECD and consortia to develop a wider implementation plan.
- professional learning pioneer schools will work with the curriculum pioneers and the wider school network to address emerging implications for professional learning.
- All regions are committed to making professional learning available to teachers and leaders throughout 2017-2018. In some cases, the guidance documentation underpinning professional conversations has already been redesigned so that these conversations can be couched in terms of the new standards, and in all regions the application of the new standards to newly qualified teachers makes it essential that key parts of the system are geared to work in line with the new standards. For example, all mentors supporting NQTs are being trained this term and next to ensure that they make appropriate and effective use of the new standards in support of NQTs. The Professional Learning pioneer schools in all regions have been involved in the development of the new standards and are equipped to work with NQT mentors and the advisory staff of the regional consortia to ensure that support and training are available.

Post September

Support and training available to help teachers transition to the new standards will be scheduled over time. There will be a growing programme across the areas outlined above in line with the needs of specific schools.

6 Accountability

- Rewrite of National Model starting soon. This will help clarify the roles of regions as delivery vehicles for WG.
- All change carries implications for resources, and some of these challenges are already being addressed. The production of new support and guidance documentation is already under way in all of the regions, and pilots will begin this term in making use of the new standards in dozens of schools across the country. Some of these schools are Pioneer schools, and are funded to invest in this work in support of the system. Other schools are engaging on a voluntary basis as part of the regions' investment in the self-improving-system, and the involvement of these schools carries resourcing implications. For the workforce of the regions themselves, there is a significant impact in professional development – for example in the case of Challenge Advisers and curriculum or pedagogy advisers who will need to be operating in the terms of both sets of standards this

year and moving to the new across the year. In most cases, regional consortia are working with partners in schools and HEIs to ensure that the new standards fit with the needs of participants in ITE and qualifications-based post-graduate work.

- Clarity on the expectations of all parties will help with accountability both in the short and longer term.