

**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'*.

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.