

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 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"/>
--------------	---	-----------------	--------------------------	-----------------------------------	--------------------------

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"/>
--------------	---	-----------------	--------------------------	-----------------------------------	--------------------------

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"/>
--------------	--------------------------	-----------------	---	-----------------------------------	--------------------------

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"/>
--------------	--------------------------	-----------------	--------------------------	---------------------------------------	-------------------------------------

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"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

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

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

We invite consideration of the following points:

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

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

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

Supporting comments

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

We invite consideration of the following points:

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

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

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

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

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

Furthermore, given the moves to devolve teachers’ pay, terms

and conditions, we would question the appropriateness of the Welsh Government (ie the body determining pay etc) also being the body responsible for establishing and 'owning' teachers' professional standards.

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

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

Supporting comments

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

We incite consideration of the following points:

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

Council would also encourage Welsh Government to consider re-establishing the EWC Code of professional conduct and practice into the standards as this would provide an element of

commonality, congruity and coherence both throughout a professional's career and between registrant groups. Removing the Code from the standards is a retrograde step with no clear rationale.

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

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

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

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

Supporting comments

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

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

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

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

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

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

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

Supporting comments

Council believes that any set of standards should be progressive. We

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

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

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

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

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

Supporting comments

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

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

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

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

Supporting comments

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

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

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

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

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

Supporting comments

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

Council is aware that work has begun in developing standards for learning support staff, lecturers in Further Education, and work-based

learning practitioners. Council is of the view that developing career pathways between registrant groups could and should be facilitated if the professional standards can be aligned. We hope that this work is not a missed opportunity.

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

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

Supporting comments

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

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

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

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

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

- 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: