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## Consultation – summary of responses

# Requirements for the provision of Initial Teacher Training courses in Wales – numeracy and literacy issues

Date of issue: November 2012

# Requirements for the provision of Initial Teacher Training courses in Wales – numeracy and literacy issues

<b>Audience</b>	All bodies concerned with initial teacher training in Wales leading to Qualified Teacher Status (QTS), higher education institutions, the Higher Education Funding Council for Wales (HEFCW), the Universities Council for the Education of Teachers Cymru (UCET Cymru), Estyn, the General Teaching Council for Wales, teaching and lecturers' unions, maintained schools and other interested parties.
<b>Overview</b>	<p>This document provides a summary of responses and provides feedback on the consultation on proposals to introduce a replacement for the Criteria for Initial Teacher Training Accreditation by the Higher Education Funding Council for Wales 2006, as amended.</p> <p>The proposals included revising requirements for the provision of initial teacher training courses in Wales to include statutory requirements for the assessment of trainees' personal literacy and numeracy skills and including a requirement for the teaching of literacy and numeracy as an integral part of initial teacher training courses. The proposals also included a number of supporting changes and updating amendments.</p>
<b>Action required</b>	None – for information only.
<b>Further information</b>	Enquiries about this document should be directed to: Helen David School Standards and Delivery Division Department for Education and Skills Welsh Government Cathays Park Cardiff CF10 3NQ Tel: 029 2082 6085 e-mail: <a href="mailto:ITTRrequirementsconsultation@wales.gsi.gov.uk">ITTRrequirementsconsultation@wales.gsi.gov.uk</a>
<b>Additional copies</b>	The consultation documents can be accessed from the Welsh Government's website at <a href="http://www.wales.gov.uk/consultations">www.wales.gov.uk/consultations</a>

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## Introduction and overview

1.1 The Welsh Government has consulted on proposals to introduce a replacement for the statutory accreditation criteria which all accredited institutions providing courses of initial teacher training (ITT) which lead to Qualified Teacher Status (QTS) must satisfy.

1.2 These are currently set out in the Criteria for Initial Teacher Training Accreditation by the Higher Education Funding Council for Wales 2006 (2006 No.50) as amended by the Criteria for Initial Teacher Training Accreditation by the Higher Education Funding Council for Wales (Amendment) 2006 (2006 No.75) (“the accreditation criteria”).

1.3 All providers who deliver ITT courses leading to QTS must be accredited by the Higher Education Funding Council for Wales (HEFCW). In order to be accredited by HEFCW, an institution providing ITT must meet criteria laid down by the Welsh Government.

1.4 The present criteria are set out in the 2006 accreditation criteria for ITT providers. These include the statutory Requirements for the Provision of ITT Courses (“the Requirements”) which set out what all ITT providers must do in running ITT courses in relation to entry requirements, training and assessment, the management of the ITT partnership with schools, and quality assurance. These are set out in Annex A to the 2006 accreditation criteria.

1.5 The provision of employment-based ITT (on programmes such as the Graduate Teacher Programme) is not subject to the 2006 accreditation criteria. This means that the Requirements also do not apply to employment-based ITT programmes. Employment-based ITT is currently governed by the Employment-based Teacher Training Scheme 2011 (2011 No. 32) (“the 2011 Scheme”), and this contains requirements for the provision of ITT for employment-based teacher training in its annex.

1.6 The consultation proposed to introduce the following changes to the Requirements to cover literacy and numeracy issues:

- (a) In the entry requirements section, changing the minimum entry standard from equivalent to a GCSE grade C in English, mathematics, as well as in a science subject for primary entrant, to one of equivalent to GCSE grade B;
- (b) Introducing a new provision in the entry requirements section which would make it mandatory for all ITT providers to ensure that all entrants are assessed as having functional personal skills in literacy and numeracy applicable in a professional teaching context, at a standard at least equal to the minimum entry level;
- (c) Introducing a new provision in the training and assessment requirements section making it mandatory for all ITT providers to ensure that trainee teachers’ personal skills in literacy and numeracy are regularly and accurately assessed throughout their training; and specifying that at the

point trainees are assessed as having met all the QTS Standards, that providers must be able to satisfy themselves that the standards at (b) are still met;

- (d) Introducing a new provision in the training and assessment requirements section making it mandatory for all ITT Providers to ensure that students are trained in the teaching of literacy and numeracy appropriate to the phase and subject being studied, and that this forms an integral part of training courses.

1.7 The consultation also proposed some supporting changes aimed at harmonising some aspects of ITT to help ensure that the changes covering literacy and numeracy issues could work on a common basis. These would require all ITT providers to ensure that:

- (a) training programmes are designed to provide all trainees with at least 60 days of training activity per year – this would be a minimum period of university-led and school-based dedicated training activity, separate from the teaching timetable;
- (b) the amount of time trainee teachers on postgraduate primary ITT programmes spend being trained in schools is increased from 18 weeks to at least 24 weeks;
- (c) the requirements for employment-based teacher training – as set out in the Employment-based Teacher Training Scheme 2012 – are amended in a similar manner.

1.8 Miscellaneous changes and updates to the 2006 accreditation criteria were also proposed as part of the consultation. This included no longer continuing to specify that ITT providers ensure that entrants met requirements for health and physical capacity to teach.

1.9 The consultation proposed that the revised criteria for the accreditation of ITT providers with the amended requirements for the provision of ITT courses would operate from September 2013, in respect of entry to ITT programmes in the 2013/14 academic year.

## 2. The consultation process

2.1 Views were sought from stakeholders to inform consideration of the proposed changes. This report summarises all of the comments received during the public consultation process together with our response. Some of the responses included general comments not directly related to the questions asked and these are addressed in more detail in section 4.

2.2 The consultation closed on 3 August 2012. A total of 35 responses to the consultation were received. Two organisations submitted a partial response to the questions raised and 13 respondents commented only and did not submit a response to the questions individually. Twenty fully completed responses were received. Following an Open Day at Bangor University where the proposals contained in the consultation were discussed with potential applicants to Bangor University's Initial Teacher Training courses, 5 pieces of correspondence were received in relation to two of the proposals. Although not submitted as a consultation response in a formal manner, the comments made in the correspondence have been included in this summary of responses.

2.3 Of the total number of responses received, 4 asked not to be identified. A synopsis of the main points raised in the consultation are outlined below, along with the resulting action taken in response to these and feedback on the main themes and key points raised. A list of the respondees is provided in Annex A with the exception of the organisations and individuals who asked for their details to be kept confidential. Copies of responses received from identified organisations and individuals are at Annex B.

2.4 The consultation document and response proforma adopted for this consultation can be found in the Education and Skills section (closed consultations) on the Welsh Government's website at;  
<http://wales.gov.uk/consultations/education/?lang=en>.

2.5 We would like to take this opportunity to thank everyone who responded to the consultation for their contribution.

### **3. Comments on the consultation questions and our responses and feedback**

***Question 1: Do you agree with the proposal to change the minimum entry standard for initial teacher training (ITT) courses for all trainees from a GCSE grade C equivalent to one equivalent to a GCSE grade B in both English and mathematics (and additionally in a science subject for all primary or Key Stage 2/3 entrants)?***

3.1 Nine of the respondents who indicated a response to this question agreed with this proposal and ten disagreed, whilst one was not sure.

3.2 Responses from those agreeing with the proposal felt that the increase in minimum entry requirements would support in the long term the raising of standards in numeracy and literacy in Wales. Although in agreement, concerns were raised as to whether the GCSE is a sufficiently accurate assessment of literacy and numeracy and that the link between academic qualifications and teaching ability is not as precise as the use of GCSE grades would imply.

3.3 In disagreement with the proposal, the following points were raised;

- The judging of mature entrants exclusively on their ability at GCSE does not allow for development or progression to be taken into account and would fail to assess the standards of the individuals at the time of their application.
- There is a concern that a number of potentially excellent teachers would be lost on the basis of restricting entry to GCSE results as it is not necessarily the qualification but the ability of, and the support for, a teacher that is important in delivering numeracy and literacy objectives.
- The argument in support of increased requirements for science is questionable. If the requirement is only for those undertaking primary or Key Stage 2/3 training programmes, then those undertaking programmes to teach science in Key Stage 3/4 or above would not need the higher grade, which would be difficult to justify. This would also lead to a reduction in the possible applicant pool for primary programmes.
- The reduction in the possible applicant pool and the impact on the diversity of applicants since many applicants, especially career changers and mature students may not meet these minimum requirements yet have the potential to be highly effective classroom teachers.
- Pupils entered for foundation GCSE Science cannot be awarded a grade B; therefore this group of potential applicants is denied access to the teaching profession as a result of their perceived ability and associated decisions made for them at age 14, irrespective of their future achievements.
- Any changes in requirements should be extended to the minimum entry requirements to Welsh language qualifications for ITT trainees who wish to undertake Welsh medium programmes.

- If the proposals are to go ahead it was felt that there should be arrangements for applicants to sit alternative tests at application.
- Current applicants would not have been aware of raised requirements.

*How are we planning to address these points?*

3.4 Many of the comments in response to this question are focussed on whether the GCSE grade achieved is a sufficiently accurate assessment of the teaching abilities of the trainee, or whether raising the minimum entry requirements would narrow the possible pool of applicants to ITT, potentially restricting access to career changes and mature students.

3.5 Currently the statutory minimum entry requirement for entry to ITT courses is the equivalent of a GCSE grade C in English and mathematics (and in science for primary courses). ITT Providers are free to set individual standards above the minimum, and at present for GCSE English there is an almost universal requirement across ITT Providers in Wales for the equivalent of a Grade B at GCSE for course entry. This was replicated in several instances for mathematics also, particularly for primary ITT.

**3.6 Given the importance attached to the raising of standards in literacy and numeracy, we feel that increasing the minimum entry requirement from a GCSE grade C equivalent to a GCSE grade B equivalent in English and mathematics will focus recruitment on applications from individuals with higher level entry qualifications. We agree that the scope of the skills and abilities required to make an excellent teacher are not restricted to education attainment at this level in isolation, but we expect prospective trainees to be able to evidence standards of literacy and numeracy. The requirement enables ITT providers to offer exceptional candidates who might not have the required grade an equivalency test which will allow them to evidence that they have a standard equivalent to a grade B GCSE.**

3.7 The proposal to increase the minimum entry requirements to a Grade B in science for entrants to primary courses for the purposes of consistency has raised issues in respect of foundation GCSE Science and concern in respect of the requirements for applicants to primary ITT programmes and the requirements for applicants to secondary PGCE programmes in the science subjects.

3.8 The issue of foundation GCSE science was raised specifically by Swansea Metropolitan University which noted that pupils who are entered for foundation GCSE Science cannot be awarded a grade B with the highest award achievable being a Grade C. This also raises the issue that applicants to primary programmes would be required to have achieved a GCSE grade B equivalent, whereas applicants to secondary science subject specific PGCE courses would not have a minimum entry requirement stipulated is noted. However, science at primary level remains a core subject. No such requirements are in place for those undertaking secondary teacher training in a science subject because potential students are required to demonstrate that they have suitable subject knowledge in a science specialism at degree level.



3.9 However, we acknowledge that given the clear focus on improving standards of literacy and numeracy, that the argument to raise the minimum entry requirement to GCSE grade B equivalent in science for consistency purposes does not hold significant enough weight. **The minimum entry requirement for a GCSE grade C in science will therefore remain for entrants to primary ITT programmes.**

3.10 We would anticipate that in respect of widening access to individuals such as mature students and/or career changers without the required GCSE grades that ITT Providers will be in a position to advise applicants on whether there are methods of testing equivalency that can be adopted prior to application.

3.11 We will also explore with ITT Providers the feasibility of introducing an alternative requirement, where the minimum GCSE grade B equivalent requirement has not been met but where the candidate has gone on to study a further higher level qualification in English or mathematics. We will consider further whether this could be applied practically under further consultation.

***Question 2: Do you agree with the inclusion of the proposed additional requirements in respect of the initial assessment of individual trainees' personal literacy and numeracy skills, the ongoing assessment throughout their training programme, and the requirement for ITT providers to satisfy themselves that the required standards are still met at the point trainees are assessed against the Qualified Teacher Status (QTS) Standards?***

3.12 Thirteen of the seventeen respondents who commented on this question agreed with the proposal. Two disagreed and two were not sure.

3.13 Responses from those that agreed with the proposal highlighted the following;

- This is more important than the requirements regarding grades for qualifications which are equivalent to GCSEs, as this can be a much more appropriate, clear and useful assessment.
- In many institutions assessing the literacy and numeracy standards of individuals undertaking the ITT course on entry, and as an on-going process, is already standard practice;
- The implementation would need careful consideration and shouldn't be detrimental to other subject studies or areas of learning and development on primary programmes or application of the pedagogy of subject knowledge on secondary programmes.
- Ideally assessments should be designed on a pan-Wales basis, and funded and implemented by the Welsh Government in line with what happens in England.
- The Council considers that the collaborative work currently being undertaken by ITT Providers in Wales to develop a common approach to the assessment of ITT trainees' literacy and numeracy skills will be particularly valuable.
- On-going assessment also helps providers to identify deficits in trainees' skills and to provide support for those that require it. The content of this

on-going assessment should be closely aligned to the skills that trainees need to teach successfully.

- There is a strong feeling that testing on entry should be an alternative to changing the GCSE entry requirements to a Grade B.

3.14 Of the respondents who disagreed or were not sure about the proposal, the following comments were made;

- It would be helpful for a precise definition of the terms numeracy and literacy. If this requirement is implemented then it is essential that these skills are better described in order to ensure a level playing field across ITT provision and similar expectations of high standards of entry.
- Whilst entry tests and exit tests would allow measures to be made of personal functional numeracy skills, this does not necessarily imply a better disposition towards the teaching of numeracy. There is a concern that the use of such tests would be counter-productive and could encourage a student to merely pass a test through instrumental methods rather than encouraging a trainee to demonstrate a commitment to developing personal numeracy skills.
- We need more clarity from the Welsh Government about what constitutes acceptable personal literacy and numeracy skills (which may not equate exactly with B grades or above in GCSE English and mathematics).
- While ITT providers in Wales have already taken responsibility for developing a common understanding about tests for entrants, this work is incomplete and support from the Welsh Government to fully embed processes would be appreciated (as happens in England). The Welsh Government should offer support so that entry tests are administered centrally.
- For postgraduate trainees who undertake a significant proportion of their course in school, opportunities for development of personal literacy and numeracy skills during university-based provision will be limited.

*How are we planning to address these points?*

3.15 There are existing statutory provisions in the Requirements relating to the assessment of trainees' personal skills in literacy and numeracy at entry. All ITT providers must – for example – satisfy themselves that all entrants can read effectively, and are able to communicate clearly and accurately in spoken and written English.

3.16 It is apparent that ITT Providers are already undertaking assessment at entry of candidates' literacy skills, and in some instances their numeracy skills, with some Providers additionally utilising this information prior to an offer of a place being made. ITT Providers also undertake both literacy and numeracy assessments of trainees throughout the duration of their course as a way of ensuring that standards are reached and maintained.

3.17 Whilst these assessments vary in approach from institution to institution, the ITT Providers are collaborating to develop a common approach to the assessment of literacy and numeracy skills. We agree with the comment made by the General Teaching Council for Wales which considers that the collaborative work currently being undertaken by ITT Providers in Wales to develop a common approach to the assessment of ITT trainees' literacy and numeracy skills will be particularly valuable. The situation differs to that in England as the smaller number of ITT Providers in Wales can work on a closer, collaborative basis to develop a common testing approach. With a smaller number of ITT places available and candidates making applications compared to England, centralising the skills tests as they do in England is not considered to be an appropriate approach.

**3.18 It is therefore our intention to include specific additional requirements in respect of the initial assessment of individual trainees' personal literacy and numeracy skills, the ongoing assessment throughout their training programme, and the requirement for ITT providers to satisfy themselves that the required standards are still met at the point trainees are assessed against the Qualified Teacher Status (QTS) Standards. These requirements will come into effect for courses commencing in academic year 2013/14**

3.19 Whilst we acknowledge the points raised that some respondents highlighted that the assessments should be designed on a pan-Wales basis, and funded and implemented by the Welsh Government, we feel that the ITT Providers working on a collaborative basis would be best placed to design and implement assessments which would be applicable in a professional teaching context.

In response to the point raised on funding from the Welsh Government to support this activity, due to the limitations placed on financial resources, it is not likely that there will be additional direct funding from the Welsh Government to ITT Providers to support the development of materials to assess ITT applicants or trainees throughout the duration of their training programme.

***Question 3: With regard to the proposed additional requirements in respect of the assessment of individual trainees' personal literacy and numeracy skills, we have indicated that these would need to be at an academic standard equivalent to the minimum entry qualification requirement referred to in Question 1; and that they would additionally need to be functional skills which would be applicable in a professional teaching context. Do you agree with this approach?***

***We would also welcome views on how the reference to functional skills could be practically described in these requirements.***

3.20 Twenty-three respondents commented on this proposal. Thirteen respondents agreed with the approach proposed, two disagreed and eight indicated that they were not sure.

3.21 The following comments were amongst those made by the respondents that agreed with the approach proposed;

- Essential skills qualifications are a means of assessing functional skills.
- In terms of requesting views on how the reference to functional skills could be practically described and applied it is concerning that this ground work has not been done, or taken to consultation, prior to this document. It appears that what is proposed is a shift to requirements to display a level of functional literacy and numeracy skills without the government having a firm and coherent view as to how that will be achieved.
- The standards must be entirely clear, consistent across Wales and practical – in other words, skills which are applied to their context, namely the ability to teach.
- In terms of how the reference to functional skills could be practically described and applied, the Council proposes that ITT providers in Wales are invited by the Welsh Government to work in collaboration to develop a common approach in this regard.
- UCU Cymru believes that it is essential to ensure that trainees' have, and maintain the necessary level of numeracy and literacy skills needed. UCU Cymru also believes that trainees must be given additional support, training and guidance, if needed, to maintain these standards of numeracy and literacy. Whilst UCU Cymru supports the additional requirements, we do have concerns over the potential increased workload on university staff required to deliver these additional requirements.
- The relevant functional skills should be assessed within the subject context. For example, someone training to teach physics will need better maths than someone teaching history.

3.22 The two respondents that disagreed did not make further comment in respect of the proposal. Those respondents that indicated that they were not sure, highlighted the following;

- There is currently no clear definition of what is meant by 'functional skills' and as such this is difficult to both assess and develop. Moreover, does the suggestion that individuals' personal literacy and numeracy skills be at a level of 'B' at GCSE , in a functional context, surely testing that ability would be a more practical and reasonable approach than the blanket adoption of a minimum GCSE 'B' grade at entry.
- This consultation question suggests that the Welsh Government does not have a clear definition of functional skills or how they may be applied. Assessing literacy and numeracy (but particularly literacy) is not an easy task. Therefore before 'raising the academic standard' and then setting additional tests on top of that, it would be more beneficial if there was some clarity given as to the perceived lack of skills that student teachers and teachers have.
- Functional literacy in a professional context is difficult to determine. It might be thought of as having secure subject knowledge which can be

shaped and transformed in order to meet the different requirements of the profession.

- The 'undecided' option has been selected largely because of the lack of clarity in what constitute 'functional skills' and 'personal literacy and numeracy skills'. It is hoped that following consultation, these definitions will be clarified.
- Members of UCET Cymru feel that the last part of this question implies that the Welsh Government is unclear about intentions for functional skills. Functional literacy and numeracy would not be the same across all subject areas and contexts; expectations need to be tailored to the subject and context. We have to acknowledge these differences in the recruitment and training of future teachers.

*How are we planning to address these points?*

3.23 We have noted the comments both for and against the proposal. On balance, we feel that with regard to the proposed additional requirements in respect of the assessment of individual trainees' personal literacy and numeracy skills, that these would need to be at an academic standard equivalent to the minimum entry qualification requirement; and that they would additionally need to be functional skills which would be applicable in a professional teaching context.

3.24 We note the concerns of respondents in respect of the definition of functional skills applicable in a professional teaching context, and that the lack of clarification in this respect has led to a number of respondents being unclear as to whether they agreed or disagreed with the proposal as stated.

3.25 We will work with the ITT Providers and colleagues internally within the Department for Education and Skills to consider carefully how these skills can be further specified. We are planning to issue guidance on the revised Criteria for Initial Teacher Training accreditation and the Requirements for the Provision of ITT Courses in due course and recognise that further guidance on the revised Requirements will need to address the concerns raised and how the Requirements may be practically applied.

***Question 4: Do you agree with the inclusion of the proposed additional requirement in respect of the mandatory training of ITT students in the teaching of literacy and numeracy, appropriate to the phase and subject being studied and forming an integral part of the training courses?***

3.26 Of the nineteen respondents who indicated a response to this question, seventeen agreed with the proposal, one disagreed and one indicated that they were not sure. The individual that disagreed did not comment further. In the responses of those that agreed with the proposal, the following comments were made;

- This is essential if the development of literacy and numeracy is to become the responsibility of all teachers rather than being seen as linked solely to the teachers of English and mathematics.

- The proposals to ensure mandatory training for ITT students in literacy and numeracy will be beneficial. This training should not however be seen as the end of the process. To have the best results teachers across all levels and experiences should be able to continually access training.
- The University has concerns, however, about what this might replace in already very full PGCE programmes.
- If this is coupled with a reduction in university-based study, there is a possibility that other training may suffer. It is vital that institutions have time to train students in their pedagogical understanding of literacy and numeracy and that this is developed alongside their personal skills.
- This will help to raise standards in these disciplines as well as highlighting their importance to trainee teachers, practising teachers, parents and pupils.
- We agree with this statement and we appreciate the use of the phrase 'Appropriate to the phase and subject' provides opportunity for differentiation in interpretation.
- Many of our members would support a specific reference to training in the teaching of reading in this context, also appropriate to the phase.

3.26 The respondent that indicated that they were not sure about the proposal agreed that any additional requirement should be appropriate to the phase and subject being studied but also additionally commented;

'However, not all teachers should be required to be trained in the teaching of literacy and numeracy. The teaching of literacy and numeracy is highly specialised and therefore to train every ITT student to teach literacy and numeracy effectively would take an unjustifiably large proportion of the PGCE course. All teachers should be trained to be able to recognise students who have problems in these areas and then obtain the correct support for them. Secondly, one should not take the time of teachers in shortage subjects in training them to teach something outside their specialism, however important. The PGCE courses are already too short therefore there needs to be consideration before adding another requirement to training courses.'

*How are we planning to address these points?*

3.27 We recognise that a significant majority of respondents agreed with the proposal and we plan to proceed with the inclusion of the proposed additional requirement in respect of the mandatory training of ITT students in the teaching of literacy and numeracy, appropriate to the phase and subject being studied and forming an integral part of the training courses.

3.28 We note the comment made in respect of capacity within the PGCE course to accommodate additional training and whether this will impact on other areas of training covered throughout the duration of the PGCE programme. We plan to consider this point further when we publish guidance on the revised Requirements.

**Question 5: Do you agree with the introduction of a requirement for all ITT providers to design training programmes so that they provide all trainees with at least 60 days of university-led and school-based dedicated training activity, separate from the teaching timetable per academic year (pro-rata for part time or modular courses)?**

3.29 Twenty respondents indicated a response to this question, with twelve agreeing, one disagreeing and seven indicating that they were not sure.

3.30 From respondents that agreed with the proposal, the following comments were made:

- In principle this is to be welcomed. Having more actual practical time in school based training will be of benefit in preparing students for the classroom environment. What is important is that this is balanced out against the existing requirements of the course. If there is additional training put into the course through university-led and school-based training then the pressure that puts on other elements of the ITT process must be taken under consideration.
- Agreement to this proposal is based on the assumption that the university-led and school-based dedicated training activity is of suitable content and quality and that this is regularly and robustly monitored.
- Agree that any move to increase the amount of support and training given to trainee teachers will only benefit them as a professional in the future.....more hours of training doesn't necessarily result in better outcomes, therefore any additional training has to be relevant and specific.
- We agree with this requirement provided that the training activity referred to entails the whole range of professional training activity (including literacy and numeracy).
- It is important that the trainees have enough time to allow proper development of subject knowledge and pedagogy.

3.31 The respondent that disagreed with the proposal commented;

- As a minimum requirement this is too low. While 60 days minimum may help protect University Based Experience (UBE) from further erosion it is essential that the UBE remains focussed on the development of reflective practitioners, able to deliver high quality literacy and numeracy skills development as a part of effective learning experiences across the curriculum. Such pedagogic development is supported by focussed UBE that ensures dialogic engagement with professional development in School Based Experience (SBE). The requirement should be that ITT Providers demonstrate effective links between UBE and SBE over the ITT programme.

3.32 Those that indicated that they were not sure about the proposal highlighted the following points;

- It depends what is meant by 'dedicated training activity'. The PGCE programme is very short anyway, so I cannot see how anything else could be meaningfully delivered within the time frame.
- Further clarity is required here, as implicitly the training provided in schools (through teaching in addition to existing 'professional studies' type elements) already amounts to this.
- This question is poorly constructed, ambiguous and needs clarifying before any attempt at a measured and reasoned response. It also suggests that when student teachers are teaching in schools, they are not being engaged in training; this is obviously erroneous and does not reflect the reality of ITT programmes and partnership working.
- The meaning and purpose of this proposal are not clear at all. What is the nature of the 'dedicated training'? When you say 'separate from the teaching timetable', do you mean the school's teaching timetable or the school timetable in the university which provides ITT?
- The consultation document does not make clear whether the 60 days refers to: literacy and numeracy training; all training; or all professional studies components so we are unable to answer the question with any certainty.
- We do not feel able to comment on this requirement because of a lack of clarity in the consultation document.

*How are we planning to address these points?*

3.33 We note that the majority of respondents agreed with the proposal to introduce a requirement for all ITT providers to design training programmes so that they provide all trainees with at least 60 days of university-led and school-based dedicated training activity, separate from the teaching timetable per academic year.

3.40 Whilst we acknowledge the comments made by those respondents that disagreed or were not sure about the proposal, it is our intention to proceed with the inclusion of the requirement to ensure consistency across both primary and secondary ITT programmes. As stated in the consultation document we believe it will complement the existing stated minimum periods trainees are required to spend being trained in schools and provide a common approach for all trainees.

3.41 We note the comments made by respondents that indicated that they were not sure as to whether or not they agreed with the proposal, citing a lack of clarity in the consultation document. We plan to consider this point further and will provide more detail on how 'dedicated training activity' may be interpreted when we publish the accompanying guidance on the revised Requirements.

***Question 6: Do you agree with the minimum time that trainee teachers on all primary postgraduate programmes spend being trained in schools being amended from at least 18 weeks to at least 24 weeks?***



3.42 Twenty respondents provided a response to this question, with fourteen agreeing, five disagreeing and one indicating that they were not sure.

From the respondents that agreed with the proposal the following comments were made;

- It is important that existing requirements of the courses are balanced with new workloads. If there is additional time spent in schools then that must be taken into account when looking at other aspects of the course.
- This additional time will help trainees further develop and hone their teaching skills.
- The Council welcomes this proposal, which will bring parity with the existing arrangements for secondary postgraduate courses. However, the Council wishes to point out that this will lead to additional workload for the classroom teacher responsible for supervising and supporting the trainee teacher.
- Twenty-four weeks training in schools gives trainees better opportunities to develop the pedagogical skills and understanding that they need to meet the standards for QTS. However, as with all school-based training, there needs to be robust quality assurance to ensure that schools provide consistent, high quality mentoring.
- If the trainee teachers are provided 'with at least 60 days of university-led and school-based dedicated training activity' and 'at least 24 weeks' in school for primary postgraduate programme this will inevitably result in an increase in the length of the programme, which we would agree with.

3.43 Those that disagreed with the proposal highlighted the following points;

- We are not convinced that within existing programme durations that this is practical. It would be very difficult to ensure students get the breadth of input required if they were in schools for 24 weeks.
- The University would disagree unless the length of a PGCE was extended to 18 months / over 2 years to allow for breadth and depth of both the interrelated and symbiotic aspects of training; i.e. school and university-based. This would involve reducing the current PGCE Primary programme from 18 weeks university provision to 12 weeks, which in turn would not allow sufficient time to support students' understanding of the depth and breadth of primary pedagogy and the primary curriculum.
- No, this is too short a time to support Primary ITT students' understanding of the pedagogic range of strategies required to be effective Foundation Phase and Key Stage 2 practitioners.....It is known that the standards for literacy and numeracy are problematic in school then it is difficult to see how spending more time in schools will help raise standards. There needs to be a genuine commitment for ITT programmes to develop partnership and collaboration with schools. The expertise from the university and the teacher needs to meet in the classroom. There is a feeling of genuine

unease about trainees spending an increased amount of time in school potentially being exposed to poor practice.

- Primary postgraduate trainees ' time in school is valuable but school experiences differ and to cut university-based provision (which is what this would mean) would be to rely even more heavily on consistency of approach and high quality provision in partner schools.

3.44 The one respondent that indicated that they were not sure about the proposal did not make any further comment on this point.

*How are we planning to address these points?*

3.45 Further to the responses received to this question, it is our intention to increase the minimum time that ITT primary postgraduate trainees spend in schools from at least 18 weeks to at least 24 weeks. This will help to ensure that primary postgraduate courses provide the same level of school-based training as secondary postgraduate courses, ensuring parity and consistency across postgraduate courses and allowing the implementation of the revised Requirements on a common basis.

3.46 We note the comments received from respondees that disagreed with the proposal, particularly those that highlighted concerns on the impact that this may have on university-based provision and the consistency of approach in respect of school-based training.

3.47 The Minister for Education and Skills has recently agreed the focus for a review of ITT that will be instigated shortly. The Review will be considering primarily;

- (i) the quality and consistency of teaching, training and assessment in ITT; and
- (ii) course structure and the coverage of issues.

3.48 In respect of the latter, it is envisaged that the Review will consider further;

- (i) the balance between school and university based training in ITT;
- (ii) the length of courses;
- (iii) if subjects and topics are given enough time or coverage on ITT courses; and
- (iv) how the sector engages with schools and local authorities to ensure courses are meeting their needs.

3.49 It is anticipated that the review will cover ITT leading to QTS for teachers working in maintained schools in Wales. It will cover both undergraduate and postgraduate courses currently provided by Higher Education Institutions (HEIs), including the distance learning courses provided by the Open University. It would also cover employment-based training in schools under the Graduate Teacher Programme. It is envisaged that the review will be completed by July 2013.

We will consider further any amendments to the structure and content of ITT programmes, following the publication of the outcome of the review.

**Question 7: Do you agree with the proposal to no longer include a requirement that all ITT trainees should meet requirements for health and physical capacity to teach, in the light of legislative developments, including the Equality Act 2010?**

3.50 Again, twenty respondents specifically replied to this question. Twelve respondents agreed, with six disagreeing and two indicating that they were not sure.

3.51 From those that agreed with the proposal, the following comments were made in response;

- Whilst we agree that any requirements that conflict with current legislature should be removed, it is important to remember that the profession remains challenging physically and mentally and this will place additional pressures on those selecting entrants.
- Due to legislative changes, notably the Equality Act 2010, it is appropriate that this requirement is removed from the accreditation criteria.
- We are that disability should not exclude someone from being a teacher and that any health and safety exclusions should be properly thought through and not based on arbitrary parameters. We hope that the new arrangements for literacy take suitable account of the problems faced by dyslexic students.
- We have agreed here because we need to meet requirements of the Equality Act 2010 and ensure that we consider reasonable adjustments if appropriate. Continued use of 'Fitness to Practice' requirements will be essential however. Experience has taught us that we can make reasonable adjustments which mean that individuals can become effective teachers.

3.52 Those that disagreed with the proposal noted the following;

- There should still be a requirement for ITT trainees to be fit enough to enter teacher.
- There are circumstances where this could be problematic. As in many jobs where you are responsible for the well being of others (i.e. for your pupils) it is important to be fit to teach.
- No. This shifts a responsibility that the Welsh Government is clearly unwilling to take onto individual institutions. This is not acceptable. It is professionally appropriate to ensure ITT entrants are supported in their career aspirations despite potential health impediments; however if these are not required to be declared then this support cannot be offered.
- Clearly we have to be governed by compliance to the Equality Act but endless examples over the years tend to show that we need to make considerable provision for students with some health issues and the earlier

we are alerted the better in the interests of students' successful completion of the ITT programme. A requirement to ascertain fitness to teach ensure that ITT providers can establish appropriate support systems as required.

- Teaching is a demanding vocation physically, emotionally and mentally. Those who seek to enter it need to exhibit the required stamina and health conditions.
- It is considered unsatisfactory that trainees' health and physical capacity to teach would not be taken into consideration at the start of a programme, both from the point of view of the trainees' own wellbeing as well as from the detrimental effect poor health/ absenteeism may have on the progress of pupils in their care.

3.53 Those respondents that indicated that they were not sure about the proposal made the following points in response;

- The sector has a duty to ensure that prospective teachers and lecturers have the necessary health and physical ability to teach and not to put children or young people at risk; however it also wishes to promote widening access and equality and diversity within all programmes. Whilst agreeing in principle with the question, it should be borne in mind that the fitness to teach regulations enables screening and medical opinion to be sought, which is necessary in a small number of cases. However, it may also serve to deter individuals with complex needs from applying to ITT courses in the first place.....as long as systems are in place within an environment that encourages individuals to declare their particular medical and disability needs, which results in suitable and appropriate support being made available in the form of 'reasonable adjustments' both in University and school experience, the need for fitness to teach as it currently stands may become obsolete.
- While we recognise that this proposed change is linked with compliance with the Equality Act 2010, there is a general concern about the increased onus on universities and their partnership schools to provide appropriate support systems in the form of reasonable adjustments.

*How are planning to address these points?*

3.54 Further to the responses received it is our intention to remove the requirement that all ITT trainees should meet requirements for health and physical capacity to teach, as set out in the Education (Health Standards) (Wales) Regulations 2004.

3.55 As highlighted in the consultation document, Section 60 of the Equality Act 2010 provides that, except in specified situations, employers should not ask health-related questions of applicants before job offers. These specified situations can include finding out whether a job applicant would be able to undertake a function that is intrinsic to the job, with reasonable adjustments in place as required.

3.56 We note the comments in response to this proposal, particular those which raised concerns on the impact on appropriate support systems if individual trainees are not required to declare potential health impediments. Given that it is not possible

to ask generic 'all encompassing' health questions of candidates, it is not thought appropriate for the Requirements to include a provision that ITT Providers must ensure that all entrants meet requirements for health and physical capacity to teach.

3.57 ITT Providers have to meet statutory obligations in respect of trainees on ITT courses under a range of equalities and disabilities legislation. We would advocate - as one respondent noted – that if systems are in place within an environment that encourages individuals to declare their particular medical and disability needs, then this will result in suitable and appropriate support being made available in the form of 'reasonable adjustment'.

***Question 8: Do you agree with similar changes to the ones covered in questions 1 – 3 and 6 being made to the Employment-based Teacher Training Scheme 2012?***

3.58 Twenty-one responses were received to this question, with twenty agreeing with the proposal and one disagreeing. Amongst the comments received from those that agreed with the proposal were the following;

- Whatever the outcome, there should be consistency for employment-based routes.
- Expectations should be the same for all ITET programmes, however there are concerns about how these requirements would be delivered for those on employment-based training, namely GTP and other programmes.
- The sector needs to be consistent and coherent in its expectations and practice.
- There is general agreement that expectations for literacy and numeracy should be consistent across different routes to teaching. However, embedding literacy and numeracy training in GTP experiences will be challenging given the nature of the programme.
- It is important that there is a common assessment standard across all providers and all routes into teaching.

3.59 The respondent that disagreed with the proposal highlighted that changes were too immediate for candidates applying in 2012 and would be unfair. This issue is addressed further under Question 9, which specifically addressed the timetable proposed.

*How are we planning on addressing these points?*

3.60 Given the support for the proposal, amendments to the Requirements as specified in the accreditation criteria will be reflected in amendments to the requirements specified in the Employment-based Teacher Training Scheme.

3.61 The timetable for the implementation of the amendments to the requirements in the Employment-based Teacher Training Scheme, will reflect the timetable as specified under the Question 9.

**Question 9: Do you agree with the proposed timetable for implementation?**

3.62 In respect of entry to ITT programmes in the 2013/14 academic year, the consultation proposed that the revised entry criteria with the amended requirements would operate from September 2013.

3.63 This question elicited the greatest response. Nineteen respondents specifically indicated a response to the question, with nine agreeing with the proposed timetable, seven disagreeing and three indicating that they were not sure.

3.64 Additionally, under question 10 where respondents could make further comment in relation to the consultation, nine further responses were received disagreeing with the proposed timetable. Several pieces of correspondence were received by School Standards and Delivery Division in response to the proposed implementation timetable in relation to the proposal to raise the GCSE grade from a C to a B for entry to ITT Programmes. The comments raised in the individual pieces of correspondence have been included under the additional comments, as the correspondence specifically made reference to the consultation proposals.

3.65 From those that agreed with the proposed timetable, the following comments were raised;

- We would advise the Welsh Government to ensure that any changes introduced to the entry requirements and course content are clearly advertised with plenty of notice to ensure that potential applicants are well aware of the appropriateness of their application.
- The timescale is appropriate.
- The proposed changes are not onerous and the ITT institutions should be able to implement them on the required timetable.

3.66 From those that indicated that they were not sure whether they agreed or disagreed with the proposed timetable, the following comments were received;

- Only if the Welsh Government funds the appropriate consideration of literacy and numeracy testing/ benchmarking.
- For the majority of the proposals, we agree with the proposed timetable. We have already declared our objection to raising the statutory requirement from a GCSE grade C equivalent to one equivalent to a GCSE grade B. If the proposal were implemented, we do not believe that putting this new requirement in place in September 2013 will be fair to candidates. A year's notice for those prospective candidates is not long at all, especially considering they would need to re-sit examinations during the final year of their degree.

3.67 The following comments were included in the responses from those that disagreed with the proposed timetable for implementation, or specifically raised the issue under Question 10 and/or in correspondence to the School Standards and Delivery Division.

- In order to implement any proposed changes for the 2013/14 cohort would mean that effective implementation from a recruitment and communications perspective would need to be from October 2012. We believe that this is too short a lead-in time, and as such would propose any changes take effect from the 2014/15 academic year – allowing enough time for perspective candidates and schools involved in provision, to adapt.
- This is not a sufficient lead in time for implementation for would be applicants, or providers and could disrupt the teacher supply model in the short term.
- Providers are likely to have published their prospectuses, including entry requirements, for the 2013/14 academic year. There may be good potential applicants, including undergraduates approaching the final year of their courses intending to pursue a course in teaching, who believed that their GCSE grades made them eligible to apply who will find this is no longer the case.
- Introduction of the revised requirements needs a longer lead in time than is proposed. We will be interviewing for the 2013/14 intake from October 2012 and it is unlikely that the changes required will be finalised by then. It also seems harsh to ‘move the goalposts’ for applicants in a relatively short space of time.
- This would depend on which of the proposals were implemented. Should the proposal to change the entry requirement to a B at GCSE be implemented then it is important that the information is disseminated in good time. A lead in time of more than 1 year (following a decision) would give prospective applicants who so not currently have grades of B or better an opportunity to attain the grades, perhaps by resitting exams. Implementing this change too quickly with insufficient warning will cause disappointment and will be seen as very unfair amongst those hoping to apply for teacher training courses in the near future.
- I understand the desire to raise standards among teachers and do go along with that, but it seems unfair on those pupils who believed they had the right qualifications, according to the university prospectus, only to realise the requirements have been changed, yet without the opportunity to re-sit their exams. It seems this is a matter of basic unfairness and I ask you to consider extending the period before these requirements come into force.
- In principle I agree with the recommendations, however the timing is far too tight. This creates a situation that is totally unfair for students who have already proceeded to follow the relevant paths onto teacher training courses.

- If entry requirements are to be changes surely you will phase in the revised requirements giving all students EQUAL rights to access university degrees in primary education? Students accessing these courses during the 2012/13 academic year will adhere to the existing standards and students wishing to access during 2013/14 will be considerably disadvantaged as the entry requirements will have been changed during the UCAS entry process leaving them little or no time at all to prepare for the revised entry requirements – which might be politely referred to as ‘moving the goal posts’.
- It is totally unfair on those in the sixth form at present and are not able to re-sit a subject in order to get a grade B in time for the 2013 applications.
- The timing is too short by far.....this creates an extremely unfair situation for students like myself who have already started to follow the appropriate paths in order to gain a place on a teacher training course. It is vitally important that I, and others who will be applying for a University place in 2013, are able to do so under fair conditions.
- We are certain that vast numbers of students in Wales will be affected by these proposed changes and would request that serious consideration be given to those whom it may affect. We strongly believe that the timescale for change should be adjusted in line with the current cohort of GCSE students, as they will be in a position to undertake GCSE re-sits for the required subjects should it be deemed necessary. Current proposals will undoubtedly penalise students who, until now, believed that they were doing everything necessary to enter their chosen University course.

*How are we planning to address these points?*

3.68 It is evident from the responses received that a number of respondees agreed with the proposed timetable for implementation in respect of the majority of the proposals.

3.69 As is evident from the comments noted above, the proposal that instigated the greatest response of disagreement in terms of the timetable for implementation was the proposal to change the minimum entry standard for ITT courses from a GCSE grade C equivalent, to one equivalent to a grade B.

3.70 Whilst the implementation timetable proposed that the revised entry criteria with the amended requirements would operate from September 2013 (for entry to ITT programmes for academic year 2013/14), the views of respondees indicated a significant level of concern that this timetable was extremely tight if the proposal to change the minimum GCSE entry standard was implemented.

3.71 For both undergraduate and postgraduate ITT courses there are set application deadlines in place, with a requirement that applications for postgraduate primary ITT courses starting in September 2013 are submitted by the 1<sup>st</sup> December 2012. For entry to undergraduate ITT Programmes commencing in September 2013, applications can be submitted from September 2012 with a deadline for submission of completed applications of 15 January 2013.



3.72 It is clear that implementing revisions to the minimum GCSE entry criteria with effect from academic year 2013/14, will impact significantly on the cohort of students who will be making their ITT applications between September 2012 and January 2013. We acknowledge the significant response received to this point and the views of respondees highlighting that implementing this change without sufficient warning for candidates will be perceived as unfair. We acknowledge also that ITT Providers will have already published their university prospectuses for September 2013 entry to programmes, stating the current minimum entry criteria for candidates.

3.73 Given that a longer period of notification of proposed changes to the minimum GCSE entry criteria is advisory – taking into consideration the short timescale between the notification of changes to the minimum entry criteria and the deadlines for submission of applications – we will be implementing the proposals in two stages.

**3.74 The timetable as noted in the consultation document will be implemented for all proposals in respect of the Requirements with effect for entry to ITT programmes in the 2013/14 academic year. The exception to this implementation timetable will be the proposed changes to the minimum GCSE entry requirements as detailed below.**

**3.75 Changes to the minimum entry standard for ITT courses for all trainees from a GCSE grade C equivalent to one equivalent to a GCSE grade B in English and mathematics will be implemented in respect of entry to ITT programmes in the 2014/15 academic year.**

3.76 We would ask that ITT Providers note the revision to the implementation timetable and endeavour to make candidates aware of the coming into force date of the changes to the minimum entry standard required.

## 4. General comments

### Question 10

4.1 Under Question 10, respondents were encouraged to note any additional comments they wish to make that were not specifically addressed under the other questions.

4.2 As noted under the summary of responses for Question 9, a number of comments were made in relation to the proposed timetable for implementation. There were also specific points raised in respect of the 60 day training period proposal which have been included and addressed under Question 5, and also the proposal to increase the minimum entry standard at GCSE to a grade B equivalent. The latter comments have been included and addressed under Question 1.

4.3 Other comments received have been grouped – where appropriate – under the following headings;

- Welsh Medium.
- SEN.
- Wider implications.

4.4 A number of further comments were received which were in response to paragraphs 3.11 – 3.13 of the consultation document which covered Welsh medium qualifications and provision. These noted that the Requirements do not currently include a statutory minimum requirement for entry to ITT courses for a qualification in Welsh and that adding a minimum entry requirement for a Welsh qualification was not proposed under the consultation. The consultation response document also did not include a specific question or sought respondents views on the issue of a minimum entry requirement for a qualification in Welsh.

4.5 Paragraph 3.11 of the consultation document noted that a consultation on the Requirements before they were introduced in 2006 included a proposal that they should incorporate some Welsh-specific entry requirements having standards which matched those for ITT courses generally, in practice many felt that there would be serious practical difficulties in adopting this approach. It was felt that referencing a Welsh GCSE standard would discriminate against those who had learned Welsh as a second language at school and who had pursued subsequent learning through the medium of Welsh. There were concerns about what would constitute a 'Welsh-medium course', with some courses being felt to have insufficient Welsh-medium content to justify an insistence on high-level language skills on entry. There was also concern that Welsh-specific entry requirements would create a barrier before entry to Welsh-medium ITT.

4.6 Several respondents commented specifically on Welsh medium entry requirements. This included the following;

- There needs to be a robust approach to literacy and numeracy in both English and Welsh medium ITT and wider school provision. The

Welsh Government runs the risk of complacency in terms of Welsh medium educational provision if it has lower expectations of Welsh medium ITT entrants than English-medium ITT entrants.

- The Council is aware of some anecdotal concerns in primary schools about the Welsh second language abilities of some newly qualified teachers. The Council invites the Welsh Government to gather additional information on this matter and to consider the most appropriate means of addressing this issue.
- Members of UCET Cymru have expressed concern about the omission of entry requirements for Welsh Medium provision. While we recognise the reasons given in the consultation document, we feel that consideration of literacy issues for Welsh medium trainees needs to be addressed. The Welsh Government needs to consider the acceptable qualifications that trainees must have in Welsh, either as first language or second language. Trainees must be able to prove their level of proficiency in Welsh is of an acceptable standard, especially if training to teach through the medium of Welsh.
- These proposals raise complex issues with regard to Welsh medium applicants and trainees. While the requirements need to reflect the equal status of both languages in Wales and provide equal opportunities for Welsh medium applicants they also need to allow for sufficient Welsh medium applications.
- There is a danger that Welsh medium applicants who have a good-high GCSE grades in their first language (Welsh) but only a C in their second language (English) will be prevented from training as teachers. Conversely, amending the requirements to include GCSE grade B Welsh language for Welsh medium applicants may lead to fewer applications for Welsh medium courses particularly for secondary mathematics and science.
- As a matter of principle the aim of improving school standards by improving the personal literacy and numeracy skills of trainees should be equally applicable in relation to literacy in Welsh as it is to English and numeracy.
- Strategic Aim 4 of the Welsh-medium Education Strategy speaks of ensuring a sufficient workforce that has high-quality Welsh language skills and competence in teaching methodologies. As well as this, one of the Strategy's main objectives under Strategic Aim 3 is to raise standards in the teaching and learning of Welsh first and second language. Therefore to ensure that you achieve what is outlined in strategic aim 3 and 4 of the Welsh-medium Education Strategy, it follows that firm proposals should have been included in the consultation document for testing literacy in Welsh. How does the Welsh Government intend to ensure that the support proposals set out in 3.12 and 3.13 will lead to the ability to prove literacy in Welsh in a way that will guarantee that the quality of Welsh medium learning is akin to English?
- Strongly disagree with the current requirement and the proposed requirement as it does not treat the Welsh language and the English

language equally. Apart from the matter of requesting a B grade rather than a C grade, the minimum entry standard should include a C (or B) in Welsh or English and mathematics. To give equal status with regard to this condition is something that is separate from the complexities mentioned in paragraph 3.11 of the consultation document. The same principle applicable to every reference to the trainees literacy standards at the point of entry, during and at the end of the training period.

4.6 On the issue of SEN, The National Deaf Children's Society Cymru highlighted the following points;

- Children with a hearing loss will face particular challenges in learning and developing literacy and numeracy skills. In particular, aspects of the phonics approach to teaching literacy can present difficulties for deaf children and young people.
- We note the proposal for a new requirement for ITT providers to ensure that students are trained in the teaching of literacy and numeracy. NDCS Cymru would urge that, within this training, teachers are made aware of the fact that deaf pupils can face particular challenges in developing these skills, and that they receive signposts to further resources and information.
- NDCS Cymru believes that it would be greatly beneficial to include some basic deaf awareness within ITT. We would not, of course expect teachers on Initial Teacher Training to become experts in deafness, but feel that a basic level of awareness accompanied with signposts to further information could go a long way to improving deaf awareness in schools.

4.7 Wider implications

- The consultation document states that *it would also introduce (training relating to the teaching of literacy and numeracy) as an area specifically to be addressed by Estyn in its inspection of ITT provision.* As a matter of clarity, the guidance for the inspection of initial teacher training, in key question 1, already states that inspectors will report on the quality of trainees' personal literacy, numeracy and information communication technology skills and how well trainees apply these skills in their coursework and teaching.
- What is being done to incentivise those with high-level literacy and numeracy skills into influential positions in teaching?
- What literacy and numeracy requirements are to be made of the broader teacher-support workforce? They too have significant impact in supporting children's learning.
- On reviewing the Induction, Leadership and HLTA standards in Wales in 2011, the Welsh Government stated that they did not intend to review the QTS Standards at that stage. However, an intention was made to review the QTS Standards as part of a more fundamental review of professional standards in due course. The Council invites the Welsh Government to confirm when this review will take place.

- Continuous Professional Development (CPD) is crucially important and is at its most effective when pedagogy, subject content and classroom management are considered together, and not dealt with as separate issues. To highlight the importance of CPD there needs to be a system of incentives and clear progression routes in education e.g. to become chartered teachers, expert teachers etc. In Finland, which has consistently shown high achievement in international comparisons of numeracy, the standard teacher qualification is at Masters degree level and we would recommend that this should be introduced in Wales also. This is also likely to have a significant positive impact on the teaching of other subjects, particularly in science.

*How are we planning to address these points?*

4.8 Whilst we note the comments generated in relation to Welsh medium qualifications and provision, as highlighted under paragraph 3.11 and 3.13 of the consultation document, it is not our intention to include a statutory minimum requirement for entry to ITT courses for a qualification in Welsh.

4.9 It is clear that ITT provision is available on a spectrum with wholly Welsh-medium courses at one end and wholly English-medium courses at the other, but in between is a range of Welsh-medium provision within courses. Variations can include, for example, an additional language improvement programme for some students, courses with both Welsh-medium and English-medium students, some but not all elements of the university-based part of the course delivered through the medium of Welsh, and opportunities for submitting assignments in Welsh, practical teaching placements at one but not necessarily both of the required school experiences in a Welsh –medium school, and practical teaching placements being considered equally valid in Welsh-medium schools, bilingual schools or schools in Welsh-speaking areas.

4.10 As noted, the Coleg Cymraeg Cenedlaethol, working with the ITT Centres, will be working towards the preparation of a development plan for Welsh medium ITT which will be incorporated into the Coleg's overall academic plan. The Coleg is also establishing within its structures a panel to consider matters relevant to Welsh-medium ITT.

4.11 In respect of secondary Welsh Medium ITT, the Welsh Medium Improvement Scheme (WMIS) provides extra support to trainees undertaking initial teacher training (ITT) through the medium of Welsh producing a comprehensive programme for trainees to achieve greater ability and dexterity in teaching and learning through the medium of Welsh.

4.12 Under the WMIS, all applicants undertake a Welsh language competency skills audit at the start of the programme to ensure that candidates are suitable for registration, and a skills evaluation is conducted at an interim point and on completion of the programme to monitor the level of linguistic improvement.

4.13 We are currently evaluating progress under these areas of development. The issue of whether to include a statutory minimum requirement for entry to ITT courses

for a qualification in Welsh was not a specific proposal included under this consultation exercise. As such, any further developments in this area will require a further consultation exercise, so that responses can be specifically sought on this issue.

4.14 We note the comments raised by The National Deaf Children's Society Cymru, particularly that children with a hearing loss will face particular challenges in learning and developing literacy and numeracy skills. In particular, aspects of the phonics approach to teaching literacy can present difficulties for deaf children and young people.

4.15 In response to the points raised in respect of developing the content of ITT to include basic deaf awareness within ITT, whilst noting that the content of ITT courses cannot specifically cover all areas and topics, SEN is embedded within the Qualified Teacher Status Standards, which are the outcome statements all ITT trainees must meet before they are awarded QTS.

4.16 Reference is drawn to Standard S2.6 Special Educational Needs which states;

*'To gain QTS, trainees must demonstrate that they understand their responsibilities under the SEN Code of Practice for Wales and know how to seek advice from specialists on less common types of special educational needs.'*

Additionally to Standard S3.3.4 Differentiating teaching which also states;

*'To gain QTS, trainees must demonstrate that they differentiate their teaching to meet the needs of learners, including the more able and talented, and those with special educational needs. They may have guidance from an experienced teacher where appropriate.'*

4.17 There are further QTS Standards which for example take account of diversity and equal opportunities.

4.18 As highlighted under paragraph 3.47 in respect of the review of ITT, it is envisaged that the ITT course structure and the coverage of issues will be considered under the review, with consideration being given to whether subjects and topics are given enough time or coverage on ITT courses.

4.19 We will await the findings of the review before taking forward consideration of further developments in respect of the QTS Standards or ITT courses.

4.20 In respect of the other comments made, revised professional standards for education practitioners in Wales were published by the Welsh Government in 2011. The purpose of the professional standards for Higher Level Teaching Assistants (HLTAs), teachers and leaders are to raise standards of teaching and to improve learner outcomes throughout Wales.

4.21 The revised professional standards for HLTAs in Wales state under the heading of Professional knowledge and understanding that those awarded HLTA status must have achieved level 2 (or above) of the National Qualifications Framework in English or Welsh (first language)/literacy and mathematics/numeracy.

4.22 Teachers must meet the Practising Teacher Standards (PTS) at the end of the induction period and continue to meet them throughout their teaching career. In respect of Professional knowledge and understanding, teachers must understand their role in improving literacy and numeracy skills across the curriculum.

4.23 We are planning to evaluate the new Practising Teacher Standards over a period of three years following their launch, to ascertain their use as a tool to support performance management and professional development and improve standards of teaching, alongside the wider school improvement agenda. It is anticipated that this evaluation will inform a more fundamental review of all professional standards, including the Qualified Teacher Status (QTS) Standards.

4.24 The QTS Standards were subject to a significant overhaul in 2006, which followed a two-stage consultation process. The QTS Standards were subsequently refreshed in 2009 to reflect revisions to the school curriculum and update legislative and other references. Any further review of the QTS Standards will need to consider how they link to the Practising Teacher Standards to ensure there is a sensible transition from training to working as a newly qualified teacher.

4.25 The Minister for Education and Skills confirmed in a written statement (23 November 2011) that from September 2012, all NQTs will have the opportunity to follow a Masters programme as part of their Induction and Early Professional Development. The key elements of the Masters programme will be development modules built upon current evidence of effective practice drawn from Wales and throughout the world. These will be focussed on the three national priorities of literacy, numeracy and reducing the impact of poverty on attainment; as well as three additional core areas that have been identified as priorities for NQTs. These are additional learning needs, behaviour management and reflective practice. Following the introduction of the Masters for Induction and EPD in September 2012, Masters qualifications will be developed for practitioners at different stages in their career, particularly for those aspiring to a leadership role.

4.26 We note the point of clarification from Estyn in respect of the guidance for the inspection of initial teacher training.

## **5. Next steps**

5.1 The replacement Criteria or Initial Teacher Training Accreditation by the Higher Education Funding Council for Wales 2012 (“The 2012 accreditation criteria) will be made by Welsh Ministers in due course. The replacement accreditation criteria for ITT Providers will stipulate the revised statutory Requirements for the Provision of ITT courses.

5.2 The 2012 accreditation criteria will come into force on 1 September 2013 for entry to ITT Programmes in the academic year 2013/14, with the exception of the Requirement revising the minimum entry standard from equivalent to a GCSE Grade C in English and mathematics, to one equivalent to a GCSE Grade B, which will come into force on 1 September 2014, for entry to ITT Programmes in the academic year 2014/15.

5.3 Similar Requirements will be made to the Employment-based Teacher Training Scheme 2012, alongside specific changes already consulted on separately earlier this year. Similar timetable for implementation of the changes will apply to both routes into teaching.

5.4 We will revisit and strengthen the Guidance Circular Becoming a Qualified Teacher: Handbook of Guidance (017/2009) in respect of Section 2 – Requirements for the Provision of Initial Teacher Training Courses, with the intention of issuing replacement guidance for Section 2. We anticipate that the revised guidance will issue in due course.

5.5 We will continue to liaise with partners and stakeholders to monitor implementation of the revised Requirements and provide additional guidance as necessary.



## **Annex: List of respondees**

Mark Gunn - Undy Primary School

Association of School and College Leaders Cymru

NUT Cymru

D H Roberts

Lynda Maddock – Swansea Metropolitan University

P Jones

M O Williams

Cardiff School of Education, Cardiff Metropolitan University

HEFCW

Dr Jane Waters – Head Initial Teacher Education and Training, Swansea Metropolitan University

UCAC

The General Teaching Council for Wales

University of Wales, Newport

Estyn

UCET Cymru

H Blackwell

D Jones

University and College Union Wales

M Price

E Price

CYDAG

E M Davies

E M Jones

Alun Ffred Jones AM

NAHT Cymru

Welsh Language Commissioner

The National Deaf Children's Society

Field Studies Council

Institute of Physics in Wales

T Jones