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Consultation – summary of response

Draft criteria for the accreditation of Initial Teacher Education programmes in Wales and the proposal for the Education Workforce Council to accredit initial teacher education

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Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Draft criteria for the accreditation of Initial Teacher Education programmes in Wales and the proposal for the Education Workforce Council to accredit initial teacher education

Audience	Education bodies involved or interested in Initial Teacher Education in Wales, including, schools, HEIs, regional education consortia, teaching unions, education training providers, awarding bodies, practitioners and national organisations and charities.
Overview	This document summarises views on the consultation relating to draft criteria for the accreditation of initial teacher education programmes in Wales and the proposals for enhancing the functions and role of the Education Workforce Council.
Action required	None – for information only.
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Additional copies	This document can be accessed from the Welsh Government's website at consultations.gov.wales
Related documents	<i>Teaching tomorrow's teachers</i> (2015) http://gov.wales/topics/educationandskills/publications/wagreviews/teaching-tomorrows-teachers/ <i>A Review of Initial Teacher Training in Wales</i> (2013) http://gov.wales/topics/educationandskills/publications/wagreviews/review-of-initial-teacher-training-in-wales/

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1. Background

In March 2014, Professor John Furlong was appointed as Initial Teacher Education (ITE) Adviser for Wales. He was asked to consider and scope the changes that are needed to bring about improvements to ITE in Wales following a review of the quality and consistency of teacher training undertaken by Professor Ralph Tabberer in 2013.

Professor Furlong has looked closely at the way current teacher training provision is organised in Wales, the evidence available to support the case for change and the measures that need to be taken in Wales to support a world class ITE system comparable to the best available elsewhere in the UK and internationally. The findings and recommendations of this review are detailed in Professor Furlong's report – Teaching Tomorrow's Teachers.

In his report Professor Furlong sets out a series of options for change including nine key recommendations geared to address the current weaknesses in ITE. The accreditation arrangements for ITE were detailed in two of the nine recommendations. Specifically these were:

- Draft criteria for the accreditation of Initial Teacher Education programmes in Wales; and
- the proposal for the Education Workforce Council to accredit initial teacher education.

During the course of this review and leading up to this consultation, extensive stakeholder engagement has taken place, including experts in ITE from within and outside of Wales. This consultation has further sought views on these two specific aspects of ITE reform which aim to improve the quality and consistency of ITE provision and introduce a new approach to initial teacher education.

2. Methodology

The consultation sought feedback from individuals and organisations involved in or have an interest in ITE.

A reduced consultation period of seven weeks was approved by the Cabinet Secretary for Education as extensive stakeholder engagement had already been undertaken. The consultation was therefore open for seven weeks running between 26 September and 14 November 2016.

In order to raise awareness of the consultation, news articles were included in both the pre 11 and post 11 Dysg newsletters and Tweeted on the Welsh Government Education channel. A news item was also posted to the Learning Wales website.

Two specific questions (questions 8 and 9) were asked to comply with the requirements of the Welsh Language Standards for policy making.

Responses were welcome in Welsh or English and via e-mail or post. All respondents received a confirmation e-mail response.

3. Summary of responses received

A total of 62 responses were received. Responses were received in both Welsh and English and all were received by e-mail. Four responses were received just after the consultation deadline. These have been included in the analysis.

While the majority used the online consultation response form, a small number responded in letter format. As a result, not all questions have been answered by all respondents. However, narrative response has been included fully in this summary analysis by allocating comments made to the most appropriate question section.

Most of the responses received were content rich and provided detailed narrative for each response area. Due regard and weight has been given to responses that have come from individuals and or organisations who represent groups of individuals.

Categories of respondents

Higher Education	10
Charities and other representative bodies	9
Individuals	9
Professional bodies	8
Unions	7
Environmental bodies	5
Anonymous	5
Schools	4
Regional Consortia	3
Religious bodies	2
Total	62

The majority of the respondents were located in Wales.

A small number of respondents asked to remain anonymous and this wish has been respected throughout this summary report.

4. Key messages

Overall there was a great deal of support for the two main aspects of this proposal. This was in some cases subject to minor changes and in others requests for further clarity. However, the overall concept was supported.

Role of the EWC

For many it seemed a logical step for the Education Workforce Council (EWC) to have responsibility for accrediting programmes of ITE and establishing a Teacher Education Accreditation Committee (TEAC). Respondents from the Teaching Council's of Ireland, Scotland and Northern Ireland said this was in line with statutory arrangements they have had for a number of years.

There was also strong support for the EWC to extend its role further and have responsibility for aspects relating to Further Education (FE). Some respondents suggested that ITE practitioner trainers should also be regulated by the EWC. There was also some support that the EWC should be responsible for the professional standards of the profession that it regulates.

In principle the majority view was that the EWC should be able to charge a fee for accreditation applications. However, this fee should be paid by the partnership not just the Higher Education Institutes (HEI) and any additional costs incurred by the EWC should not be passed on to registrants.

Capacity and workforce planning

Several union respondents and others commented that the proposals would require a significant shift in the allocation of resources and manpower. An extended role for the EWC would require an extension of current capacity and capabilities. Similarly schools would be required to build capacity and expertise to do a significant amount of work.

The importance of HEI lecturers having relevant, high quality and recent school-based teaching experience was stressed. However the 15:1 staff ratio would possibly restrict some HEIs by not allowing the flexibility to run larger seminars and other economies of scale or be unviable for others.

Equality of opportunity and access to an appropriate Welsh language course irrespective of location was raised. Careful planning would be required to recruit Welsh speaking students and ensure staff in HEIs and schools are able to deliver ITE through the medium of Welsh as required.

Partnership and collaboration

The overall concept of the partnership arrangements was generally accepted. Flexibility was stressed as important and many respondents asked for further clarification on some aspects. Good management, accountability and adequate funding would be important.

Some clarity was sought on the role of Estyn, HEFCW (Higher Education Funding Council for Wales) and the regional education consortia.

An area mentioned by several respondents related to the types of school able to participate in the partnerships. Some thought that only 'green' category schools were eligible. Similarly, some asked if schools outside Wales could participate. Others raised issues around the capacity of smaller schools and the need for a wide range of learning experiences to be available to student teachers.

Composition of the TEAC

Half of the teaching unions who responded to the consultation disagreed with the proposals to extend the remit of the EWC. This was partly for reasons mentioned previously relating to capacity and capability. It was also because they felt the EWC was not representative of their members in its current form and the role of HEFCW was somewhat unclear.

The other teaching unions who responded either supported the proposals or were not opposed to them. However, this was very much dependant upon the EWC remaining independent and credible. The main aspect stressed was the need for membership of the TEAC to be fully representative of the teaching profession. Specifically this would mean the inclusion of teaching professionals and union representatives.

Other suggestions were made for membership. These included HEI representatives, lead school partners, FE partners, regional consortia, Church in Wales, natural environment and Welsh medium partners. Several respondents noted that the appointments process was unclear as was how organisations would work together.

Most respondents agreed that the TEAC needed to be fully representative and inclusive. In order to achieve this, the committee needed to be fluid, flexible and responsive. Appropriate expertise and representation should be co-opted to the committee as and when required.

Criteria for accreditation

While a minority agreed that minimum standards were important to ensure consistency across the sector, flexibility to allow innovation and future-proofing was also required. However, the majority view was that the suggested criteria did not provide enough detail for the development of ITE programmes. These responses were individually specific about the area suggested for strengthening or clarifying. Several respondents suggested that the criteria should also specify the partnership's capacity to deliver through the medium of Welsh.

The proposed accreditation process was regarded as ambitious. However the five year accreditation process seemed reasonable.

Entry requirements

The entry criteria and selection standards were broadly welcomed with some suggestions for improvement. Help for support staff wishing to apply, a teaching professional on the

interviewing panel, a requirement for physical fitness and previous experience were some of the suggestions made.

The grade B GCSE in English/Welsh and maths was raised by several respondents. Some supported the requirement while an equal number were opposed to it. NASUWT Cymru suggested that the focus should be about becoming a capable teacher. Further clarification was also sought in relation to accepted equivalent qualifications. Similarly, clarification was sought about the transferability of teaching qualifications gained outside Wales.

Some disparity in relation to entry requirements was raised. Individuals who wish to work in Welsh medium schools currently have to prove a high level of proficiency in Welsh. However, there is no language proficiency requirement for those who intend to work in English medium schools.

Welsh Language

In addition to the specific aspects already mentioned, several respondents suggested that the criteria should have direct links to the Welsh Government's ambition for a million Welsh speakers by 2050. Language links between the existing teaching workforce and wider society were recognised. Several respondents also noted that ITE provision had a clear role to play in supporting the 2050 ambition and Welsh language ITE intake numbers should support this.

ITE course content

Respondents from the Royal Society of Chemistry and Institute of Physics stressed that ITE should be practical, especially in STEM (Science, Technology, Engineering and Mathematics) subjects and age appropriate.

The practical nature of ITE was also important for the environmental bodies who responded to the consultation. The benefits of practitioners being able to facilitate learning in the outdoor environment had clear links to the Well-being of Future Generations Act, global citizenship, health and wellbeing.

Several charities suggested that in light of the proposed Additional Learning Needs and Education Tribunal Bill Wales, ALN, dyslexia/SpLD (Specific Learning Difficulties) and deaf awareness should be a mandatory part of ITE.

5. Overview of consultation responses

This section summarises the responses received by question. Notably, not all respondents answered all questions and percentages may not add to 100% due to rounding.

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

Agree	82%
Disagree	11%
Neither agree nor disagree	7%
Number of responses	55

There was overwhelming support for the proposal that the EWC should have the responsibility of accrediting ITE programmes. Several respondents commented that the EWC would fulfil and extend a number of regulatory roles including that of gate-keeper, maintaining public trust, ensuring quality, safeguarding children and ensuring fitness to practice against the standards. The EWC was seen to have already proven its ability to undertake a wide range of duties to a high standard and this additional responsibility would bring the EWC in line with other regulatory bodies.

- This is a totally appropriate responsibility for a professional body. Initial teacher education qualifications should have a 'dual currency' i.e. they are academic qualifications and this is provided for by Higher Education Institutions, however, they are also professional qualifications and this professional status is most appropriately awarded by a professional body; in the case of Wales this should be the Education Workforce Council. General Teaching Council for Northern Ireland
- Currently there is no body in Wales considering whether programmes are professionally appropriate. I therefore welcome the Welsh Government's proposal to replace the current process of accrediting training providers by the accreditation of ITE programmes of study. I also welcome the proposal that all programmes should be accredited – this should include the Graduate Teacher Programme (and Teach First, should it be continued). Gary Brace

There was also strong support that the role of the EWC should be extended to include Further Education (FE).

- It is important that all teaching practitioners, regardless of sector, should benefit from the same excellent initial education to ensure consistent high standards of professional practice across the whole education sector. Anonymous
- Dylai LLC, fodd bynnag, ystyried ymestyn y cyfrifoldeb i gynnwys Addysg Bellach fel bod y proffesiwn yn cael ei gynnal a'i gefnogi mewn modd mwy holistaidd, gan fod y dadleuon dros weithredu yn y modd hwn i godi safonau ymarfer athrawon yr un mor berthnasol i ddarlithwyr addysg bellach. Awgrymir y byddai'n fuddiol I wneud hyn yn gynt yn hytrach na hwyrach. Richard Parry Jones
- Further, since the responsibility for professional registration and regulation has been extended to six other groups under the remit of the Education Workforce Council, it would seem a logical extension to ensure rigour by extending the responsibility for

accrediting programmes of training to groups other than teachers. Fairwater Primary School

- The University considers that the role of the EWC is central to the development of ITE in Wales and should serve both the compulsory and post-compulsory sectors. The University sees the EWC's role in accrediting ITE as pivotal in maintaining the focus upon a research-based and research-focused ITE provision in Wales, across all age groups. Wrexham Glyndŵr University
- Any new ITE qualification needs to fit with the existing Further Education workforce and recognise the difference between provision of subject teaching in schools and provision of subject teaching in Further Education. The issue of ITE is linked to that of professional standards in both schools and FE institutions. Appropriate professional standards need to be developed for both the teaching and FE professions and should not be limited to *initial* teacher education. ColegauCymru / CollegesWales

In terms of ITE teaching, some respondents suggested that it was also important for trainers themselves to be subject to some degree of regulation.

- ITE trainers should work towards having sufficient subject knowledge and expertise to be eligible for chartered status in the subject(s) relevant to their role. This would provide them with a stronger grounding to best be able to deliver training to teachers in their subject. Institute of Physics
- In Scotland it is also a requirement that all lecturers delivering ITE programmes are registered with GTC Scotland. The General Teaching Council for Scotland

Caution was also advised in ensuring the EWC had adequate manpower and resources provided to undertake the role along with the development of capacity and capabilities beyond those which it currently has. For several respondents the proposals were welcomed but further clarification was required in some areas.

- We welcome this decision in broad terms, noting, however, that there is currently no detail on the proposed composition of the Board, nor a fully motivated justification in the draft criteria for not adopting the recommendation in its original form. The University would like to have confidence that the models proposed are affordable and would like to know more about the potential for a levy upon HEIs for application. University of South Wales
- It would be helpful to provide clarity on how the accreditation of different programmes could be managed holistically to reduce burden, particularly where an institution has a number of different programmes. We think that while HEFCW should retain the ability to fund this higher education provision, the body with responsibility for accrediting ITT provision should also undertake the allocation of numbers to provision. HEFCW
- It makes sense that as the EWC will ultimately approve entrants to the profession, that they should provide accreditation to the programmes. However the EWC is not a body that represents Higher Education. As it will be HE providers delivering the accredited courses and as the courses will be adult education courses, it seems incongruous that the accreditation process does not sit within a body that oversees post 16 education and training. UCU

A small number of respondents disagreed with the proposal. One noted that the idea was appropriate, however, the EWC had recently expanded its remit and this has yet to be

assessed as effective. Others commented that the current form of the EWC was not considered appropriate and it was not clear from the report why giving those responsibilities for accreditation would improve quality or provision.

- Unlike the EWC, the GTCS is well-established, has relatively high standing across the teaching profession and the public, and has a clearly delineated regulatory remit. The Union asserts that the EWC cannot reasonably be described in comparable terms. NASUWT Cymru
- The EWC is not representative. Without changing the make-up of the EWC to include elected representatives from each of the education unions you cannot give it further responsibilities. ATL Cymru
- Ym marn UCAC, o brofiad ein haelodau, nid ydynt yn gyffredinol yn canfod CGA fel “llais” y proffesiwn. Nodir yn y ddogfen ymgynghorol y bydd dal rôl gan y CCAUC. Beth fydd natur y berthynas rhwng y CGA a CCAUC? Os bydd gan y ddau gorff rôl o ran darparu AGA, bydd rhaid bod yn hollol eglur a thryloyw ynglŷn â’u perthynas. UCAC

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

Agree	81%
Disagree	8%
Neither agree nor disagree	11%
Number of responses	53

The concept of a committee within the EWC was also widely regarded as appropriate. A flexible and fluid model was suggested by the Teaching Council Ireland as important to enable the EWC to learn and improve. They also stressed that appropriate expertise would be required to support reviews of different programmes and no one committee or working group would have all the requisite expertise to conduct every review.

- This model has been successfully used by regulators. Such committees are frequently supported by Panels, which can meet more frequently to address interim accreditation issues. Membership of the committee should include lay representation to ensure that the interests of the public are sufficiently taken into account. Sheila Drayton
- Such a move would be consistent with, and similar to, the approach taken in Scotland by GTC Scotland where the Council’s Education Committee delegates programme scrutiny to Accreditation Panels. Each Panel normally consists of a minimum of five members; at least two members are persons external to the Council. The size of the Panel varies in relation to the number of programmes to be accredited, the number of students on the programmes and the complexity of provision. Panel meetings are chaired by Panel Conveners appointed from the Committee. The external members are drawn from the educational community at large and include representation from the higher education sector and, as appropriate to the programme, local authorities and/or schools or the college sector. It should be noted that specialist advice may also be sought on specific aspects of the programme(s). The General Teaching Council for Scotland

The composition of the committee was widely regarded as an important factor in ensuring an effective, efficient and robust review and accreditation process. The Teacher Education Accreditation Committee should be representative of the various stakeholders involved and should also ensure that it builds on the expertise and collective experience of those already heavily engaged in ITE. Several suggestions for membership composition and offers of support were put forward which included individuals with specific areas of expertise, stakeholders and organisations who represent others.

- Again we do not disagree with this proposal but we do stress the need to ensure there are individuals with expertise in the field, specifically practicing teachers, included on this committee. NUT Cymru
- the university sector should be represented on such a committee by academics with relevant expertise and experience and associated with courses judged to be of good quality by the inspectorate. Anonymous
- Consideration should be given to having lay representation with appropriate interests and skills in addition to people with a knowledge and expertise in ITE, a learning environment and inspection. Steve Powell
- From our point of view the main body of such a committee should be from the teaching profession. UCU
- The TEAC should include at least one member from the Universities and Schools Council for the Education of Teachers (USCET), as the representative (and non-institution affiliated) body of teacher education partnerships. USCET
- Currently the Council is made up of people appointed by Ministers. We strongly believe there should be no more 'mission creep' or an extension of the remit of the EWC until it includes members elected from all the education unions. We note that the Scottish GTC is held up as a good practice example in this consultation. We would note that 19 members of their board are currently elected ATL Cymru
- As one of the three providers of maintained education in Wales, alongside the State and the Church in Wales, the Catholic Education Service (CES) would expect representation from our sector. Catholic Education Service
- RWLCP would like to see the natural environment, sustainability and out of classroom learning represented on this panel. Real World Learning Cymru Partnership
- The whole area currently described as ESDGC is such a vital element in young people's education (as reflected in the Well-being of Future Generations Act) that it should be represented in the expertise on this panel. Centre for Alternative Technology
- Dylid ei gwneud yn gyfrifoldeb mandadol fod pwyllgor o'r fath yn cynnwys arbenigeddau addas i warchod buddianau'r sector cyfrwng Cymraeg gan gydnabod yn benodol anghenion darparu cyflenwad digonol o athrawon gyda'r sgiliau a phrofiad i ymateb i flaenoriaethau clodwiw ac uchelgeisiol LLC ar gyfer y maes. Richard Parry Jones
- Yes – and we suggest representation would need to be carefully planned and constructed around all partners in Wales. This includes but might not be restricted to WG, Regions, LAs, Partner and Lead school practitioners, EWC, HEI's, FE Partners. EAS

In addition to having clarity about the exact nature and composition of the committee, clarity about how the committee would be appointed and how organisations would work together was sought.

- We broadly agree with this approach. It is unclear from the consultation document whether appointments will be made by Welsh Ministers or by the EWC itself. Teach First Cymru
- However, further detail is required on its membership, terms of reference, criteria for the evaluation of ITET programmes, operating procedures and accreditation processes. The role of Estyn and its potential involvement in the work of the EWC requires clarification; Estyn’s role in monitoring the quality of provision and its regulatory function requires consideration regarding any possible conflict of interest. University of Wales Trinity Saint David; Institute of Education
- How will the regional consortia be involved in the selection of participating ITE lead schools? Will representatives from the regional consortia sit on the TEAC (Teacher Education Accreditation Committee)? How will regional consortia be involved in the quality assurance of ITE programmes? Central South Consortium

A small minority disagreed with the proposal to establish a committee.

- The consultation states that the task and finish group recommended a board be set up. We cannot see why this has been changed to a Committee. The expertise required to accredit ITE is not the same as that required for membership of the EWC, and is unlikely to have relevant expertise that a board of experts would have. Again, we cannot support extending the remit of the EWC without using this opportunity to make it fully representative. ATL Cymru

Question 3 – Do you agree that the criteria for the accreditation of ITE in Wales, as set out at Annex A, provides sufficient detail for the development of initial teacher education programmes?

Agree	29%
Disagree	38%
Neither agree nor disagree	33%
Number of responses	52

A small number of respondents commented that the suggested criteria were entirely sufficient and a further minority cautioned against criteria that were too prescriptive.

- The criteria, if anything, are too detailed. While it is important that they ensure a measure of consistency across the ITE sector and identify minima in terms of structure and content, care must be taken they do not unduly fetter the development of innovative practice and the development of new models of partnership. For example, the criteria must allow for: ongoing changes to the school curriculum; partnerships of schools & universities to decide how different responsibilities should be shared; the development of innovative (e.g. part-time) training programmes; and other merging developments. The criteria, as drafted, are in danger of being overly prescriptive and insufficiently future-proof. USCET

However, the majority view was that the criteria did not provide sufficient detail for the development of ITE programmes. Although the general principle was not disputed, the level of detail and the omission of particular points was noted. The omission of reference to the Teaching Standards was frequently quoted.

- I agree but only up to a point. The "end point", ie the standards which are eventually to be met by qualified practitioners are not defined/outlined. Anonymous

Alongside this, respondents made specific points which they thought should be referred to in the criteria.

- I wasn't able to find any reference to student's needs as individuals in paragraphs 13, 14, or 15. Sheila Drayton
- 1. Os yw 'ysbrydol, moesol, cymdeithasol a diwylliannol' yn parhau yn faes statudol yng Nghymru fel ag y mae yn Lloegr, oni ddylid ei gynnwys fel rhan o'r meini prawf hyn? 2. Onid yw hi'n amser erbyn hyn i nodi faint o oriau addysgu pynciol y dylid ei gynnwys mewn cyrsiau hyfforddi cynradd? Er enghraifft, mae cynllun ar droed gan NATRE (National Association of Teachers of RE) yn Lloegr i sicrhau bod Addysg Grefyddol yn cael 12 awr o addysgu mewn cyrsiau o'r fath. 3. Onid ellid disgwyl i ymgeiswyr am gyrsiau hyfforddiant ddilyn cyrsiau ychwanegol, os oes angen hynny, i wella eu gwybodaeth pwnc cyn dechrau cwrs hyfforddi, e.e. dilyn cwrs carlam dros gwyliau'r haf? Eglwys Bresbyteraidd Cymru
- Firstly, although sector specific ITE professional learning is clearly expressed, ensuring that newly qualified teachers have had additional experience in other sectors (Early Years, Primary, Special, Secondary), other than their first choice, would be positive. In addition, cross phase (Nursery, Primary, Secondary age-groups) experience would also be of great benefit to ensure that newly qualified teachers fully understand their role in the broader education continuum of children and young people. One of the additional areas to consider should be the capacity of the partner schools to meet the needs of students whilst maintaining its core duty of ensuring high quality education for the pupils it serves. In addition, given the specific requirements and structures within Wales, particularly that of smaller schools, school-based experience for all students should include those that reflect the huge range of settings across the country (small, medium, large, welsh, bi-lingual). NAHT Cymru
- We would welcome clarity on whether 2-year PGCE and 4-year BA Primary with subject study programmes can be bid for under these criteria, and whether the 120 days in school and 60 days of university/school-based training can overlap. The Association for Science Education
- we would appreciate clarification about whether accreditation applies to individual programmes or to partnerships as a whole. If accreditation applies to individual programmes, there is insufficient information as to how this will work in practice. University of South Wales
- We're pleased to see the inclusion of the section on the Equality Act as part of the Programme inputs. It's crucial that teachers are given adequate training to understand the wider impact their teaching can have on pupil's future decisions and aspirations. However, we feel this section could be strengthened, going beyond simply 'encouraging' to 'requiring' teachers to teach 'in a way that does not subject pupils to discrimination and actively tackles key inequalities'. Chwarae Teg
- However there is nothing in the criteria listed that would ensure trainee teachers develop the skills to become competent and confident in the outdoors – essential to bringing the ESDGC, Biology, Geography and STEM curricular to life and an

enormous benefit to both physical and mental wellbeing when using the natural environment to teach a range of subjects in. Natural Resources Wales

- The criteria for determining the accredited centres are comprehensive but we suggest that here an opportunity to ensure that the language is more central to the process. Y Ganolfan Dysgu Cymraeg Genedlaethol
- further detail is needed to ensure that the importance of outdoor learning is included to ensure that the hands-on learning experiences required by Successful Futures can be delivered to a high standard Field Studies Council
- CAT is concerned about the lack of reference to the vital importance of sustainability education (ESDGC). Centre for Alternative Technology
- However, while it is recognised that this approach is not objectionable in principle, the Union maintains that there is a need for clarity about the way in which the 'lead partnership' schools involved in training will be identified and supported to meet the expectations set out in the draft criteria. NASUWT Cymru
- Mae angen i bob SAU/partneriaeth cynnig llwybr cyfrwng Cymraeg. Hefyd, dylid nodi natur y llwybr, a'r gofynion o ran y meini prawf. Dylai fod modd dilyn y cwrs yn gyfan gwbl ac yn rhannol trwy gyfrwng y Gymraeg, gan gynnwys cyfrwng yr addysgu, cefnogaeth ychwanegol, y lleoliadau profiad dysgu a'r asesiadau. UCAC Cymru
- Mae angen i 5.2 (Atodiad Meini Prawf) restru'n benodol y dylai unrhyw raglen AGA a gaiff ei achredu ddangos sut mae'n paratoi'r darpar-athrawon i weithio'n effeithiol mewn cyd-destun dwyieithog (Cymraeg a Saesneg). Ar hyn o bryd, nodir dan y pwynt bwled hwn: 'llythrennedd', 'rhifedd', 'llythrennedd digidol', 'cynhwysiant cymdeithasol' a 'chydweithio'. Er bod dwyieithrwydd yn rhan o 'llythrennedd' a 'cynhwysiant cymdeithasol', dylid ei enwi'n benodol er mwyn amlygu'r pwysigrwydd y mae Donaldson a Furlong yn ei roi i rol athrawon yn y gwaith o ddatblygu Cymru. PCYDDS
- If such criteria were to be introduced for ITE for student teachers in the FE, WBL & ACL sectors then additional and different issues would arise. For example partnerships in these sectors would need to be between the organisation delivering the ITE qualification. City & Guilds
- If the partnership is not a legal entity, the following issues need clarification. Who 'owns' the student and grants the qualification or makes the recommendation for QTS? Is the accreditation granted by the school, the HEI or jointly? Who maintains student data? Who will be considered accountable for providing high value ITE? If the course is graded unsatisfactory on inspection, who is ultimately responsible? Will the course leader sit within the school or the university? Point 14 of the executive summary suggests that the HEI is responsible for student welfare which implies that the student 'belongs' to the HEI. Who receives the funding and who will be required to account for its spending? What happens if one of the schools in the partnership is graded as 'satisfactory' or lower during a school inspection – how would this impact on the provision? Will there be additional funding for the protected time required for teachers who are supporting students? Is there a limit to the teacher CPD that should be covered within the partnership? At what point would charging for materials/training become acceptable? This point is relevant to a number of the questions posed in this document. The Open University in Wales

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

Agree	63%
Disagree	7%
Neither agree nor disagree	30%
Number of responses	54

A significant proportion gave broad agreement about the proposed roles and responsibilities for partnerships with a further third who neither agreed nor disagreed. For both response groups a lack of clarity in some areas or issues around the reallocation of roles, responsibilities and resources was frequently raised. Several also stressed the need for flexibility within partnerships.

- Broadly, these embody the principle that ITE needs to draw upon the most appropriate expertise to provide student teachers with the input and experiences they need. Anonymous
- Un o broblemau creu partneriaethau SAU yw ceisio osgoi'r sefyllfa lle mae sefydliadau AU yn brwydro am yr un ysgolion neu'n gorfod gosod hyfforddeion, oherwydd nifer yr hyfforddeion, mewn ysgolion nad ydynt cystal â rhai eraill. Eglwys Bresbyteraidd Cymru
- The proposals do not make clear whether the partnership arrangements should only include lead partnership schools, or whether other partnership schools might also be included. HEFCW
- a number of points need to be clarified concerning the 'ownership' of the students and the ultimate accountability for the quality of the provision and spending of the funds. The Open University in Wales
- the responsibilities afforded to HEIs and their partnership schools are outlined quite clearly, but HEIs should have more freedom in the selection of partnership schools. There remains some ambiguity around the concept of 'research' and 'research active ITE staff'. North and Mid-Wales Centre of Teacher Education
- in some areas of North East Wales, the number of green schools is limited. It may be appropriate to consider lower level classifications where there is a known level of expertise and experience in supporting ITE trainees. Lead schools may not always be located geographically to meet the needs of trainees who are placed in rural schools. Wrexham Glyndŵr University

In addition to this requirement for flexibility, others stressed the significant shift in the allocation of resources and investment by schools that would be required. Schools would be required to build capacity and expertise to do a significant amount of work.

- By working in partnership, schools and HEIs will require new procedures, protocols and systems for managing information and the secure transmission of confidential data. Standards for these arrangements should be consistent across partnerships. University of Wales Trinity Saint David; Institute of Education

Very few disagreed with the partnership proposals. However, those who did said that it was because of this changing role and concerns about the additional workload for schools.

- Mae gweithio mewn partneriaeth yn ei hun, yn anorfod yn creu gwaith ychwanegol.
UCAC Cymru

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

Agree	71%
Disagree	6%
Neither agree nor disagree	24%
Number of responses	51

The proposals for partnership working were on the whole welcomed by respondents with a significant amount of broad agreement. However, some specific aspects were thought to require further work to clarify and address concerns raised. These related to who could be an accredited provider and how particular operational tasks would be addressed.

- If the EWC will be accrediting ITE programmes rather than providers in future, doesn't that allow room for new providers eg lead schools with a track record of excellence also to be considered 'providers'? Central South Consortium
- The proposals specify the staffing requirements for HEIs and the overall functions to be provided by 'Lead' schools. However, the requirements need to be sufficiently flexible to enable a range of delivery models to be considered. For example, rural schools might need to work in a cluster in order to meet the overall requirements of the partnership. University of Wales Trinity Saint David; Institute of Education
- Section B (criteria for accreditation) states that 'lead partnership schools will play a prominent part in recruiting student teachers'. Recruiting student teachers is different to recruiting teachers and schools will need time and resource to set up this recruitment processes. In England, many schools employed administrators to be involved in this task (which is often lengthy due to the checks required). Will there be additional funding for schools to accommodate this workload? Similarly, will schools receive additional funding to ensure that they have the time and resource to collaborate with HEIs on course content and development? We feel the aspiration that all student teachers should have the opportunity to undertake at least one third of their school experience in a school that is recognised for high quality provision is too low. The Open University in Wales
- The NASUWT is clear that the partnership arrangements between the schools and the HEIs must be managed well if both are to play an effective role in providing high-quality ITE. However, the Union is concerned that the draft criteria do not set out in sufficient detail how such relationships should be managed at local level and fail to identify fully the requirements in relation to the training of teachers involved in the delivery of ITE, particularly in respect of the selection of candidates. Consequently, the NASUWT believes that the draft criteria should be amended accordingly.
NASUWT Cymru
- The risks of schools or HEIs facing challenges with inspection standards will need to be accounted for, with time frames agreed for remedial action where required. Some

guidance on the QA agreements to be established between the partners or standards for a risk assessment process that recognises identifiable risks across Wales would be helpful. Wrexham Glyndŵr University

The need for staff to be suitably qualified was again raised as a particular area where the overarching requirements needed to be further developed.

- GTC Scotland would suggest that, as well as requiring teaching staff to have a qualification at a higher level than the accreditation level of the course on which they are teaching, they should also be registered with EWC. The General Teaching Council for Scotland
- NAHT Cymru would draw particular attention for the need of HEI lecturers and tutors to have relevant, high quality and recent school-based teaching experience. As we are now expecting our teaching workforce to be reflective, refining and developmental professionals, it must be expected that those supporting the students to become qualified teachers have an up to date, practical and relevant understanding of this same pedagogical approach. NAHT Cymru
- The proposals for ITET staff to be research active are welcome as is the requirement for staff to be qualified at (or working towards) a level above that of the course being taught. The overarching requirements will need to address the capacity of the partnership to support the delivery of Welsh medium and dual language programmes and the aim of having 1 million Welsh speakers by 2050. University of Wales Trinity Saint David; Institute of Education

A particular issue was raised by three respondents. The suggested student-staff ratio of 15:1 was a potential area which may restrict partnerships flexibility and possibly ability to deliver sustainable provision.

- In general, the overarching requirements are fine. However, we do not understand the reasons for suggesting a student-staff ratio of 15:1 for the HEI as this would unduly challenge the sustainability of provision and militate against an equitable distribution of resources across the partnership. We have concerns that meeting this requirement may be unviable for some HEIs and our concern would be both for ASE members' jobs, should some HEIs decide not to continue with ITE, and also for sufficient numbers of HEI establishments to ensure teacher training availability across Wales, particularly in STEM subjects across the school age range. Association for Science Education
- The criteria that HEI staff at a ratio of 1 -15 is generous and perhaps should stipulate that some staff are located in the school or cluster of schools. ERW
- Broadly yes, but the application of a narrow interpretation of what constitutes a student-staff ratio of 15:1 would unduly challenge the sustainability of provision and militate against an equitable distribution of resources across the partnership. Whilst HEIs can be reasonably expected to run seminars and tutor groups of no more than 15 students, there needs to be the flexibility to allow for large-cohort lectures and other economies of scale that would bring the overall SSR to a level similar to other comparable university programmes. Anonymous

Respondents generally thought programme inputs for were clear. A small number of specific points were raised.

- The content for core studies, professional studies and subject studies is best presented as guidance only. In particular, employment-based routes will have a different approach to delivering the components specified within the consultation document. We assume that the requirements for secondary PGCE subject studies will include thorough study of AOLEs and the curriculum and skills dimensions of the Welsh Baccalaureate. University of Wales Trinity Saint David; Institute of Education
- FSC agrees with the overarching requirements but would welcome the specific inclusion of outdoor learning in bullet point 6, pg 31 eg “experience in a minimum of two contrasting school settings, *including teaching outside the classroom*”. Field Studies Council
- Ran yr Astudiaethau Craidd. Nodwyd eisoes y dylid cryfhau geiriad 5.5. pwynt 5. Bydd angen sicrhau bod yr iaith Gymraeg ac ymwybyddiaeth drwyadl o ddiwylliant Cymru yn rhan annatod o gynrig Astudiaethau Craidd pob SAU a phob Ysgol o fewn y Barneriaeth. PCYDDS

Issues around diversity and inclusivity were also raised by some respondents who again stressed the need for flexibility to enable a range of delivery models to be considered. Being able to work with all types of schools and capture best practice in all settings was also raised by the small number who disagreed with the proposal.

- If such requirements were to be introduced for ITE for student teachers in the FE, WBL & ACL sectors then the programme structure, partnerships, leadership, roles, responsibilities, programme inputs and standards would need to be developed to be appropriate for them to undertake their ITE qualifications in those sectors. City & Guilds
- A reference to the distinctiveness of the maintained Church school provision in Wales and the expectation of Catholic school and HEI accredited partnerships would be helpful. Catholic Education Service
- The phrase ‘In identifying lead partnership schools, the HEI should consider only effective schools that are recognised within their regions for high-quality provision’ suggests only schools categorised ‘green’ would count here and that will limit the school placements available. Rhodri Thomas

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

Agree	67%
Disagree	15%
Neither agree nor disagree	17%
Number of responses	52

Two thirds of all respondents agreed with the minimum standard requirements for student teachers. Areas for improvement were suggested.

- NAHT Cymru believe that a current school leader / senior teacher mentor must be included on the interviewing panel for prospective student intake for ITE. It would be sensible to ensure that there is an expectation that lead schools are directly involved, for example. The 'appropriate personal and intellectual qualities to become excellent practitioners' as laid out in the selection minimum standard requirements, must include some degree of evaluation of the candidate's emotional intelligence as neuroscience has evidenced the clear link between the trust required in a teacher / learner relationship and the rate of learning progress made by the child / young person. NAHT Cymru
- We broadly support the entry criteria set out for ITE. However, we would add that should any existing support staff wish to apply to become teachers, they are supported to help them gain any qualifications needed to reach these entry requirements. ATL Cymru
- While we agree with the introduction of a minimum standard if such criteria were to be introduced for ITE for student teachers in the FE, WBL & ACL sectors then additional and different issues would arise. For example in many cases the student teachers in these sectors often possess advanced craft, trade or other vocational expertise, skills and knowledge e.g. in areas such as Construction, Health & Social Care, Digital Literacy, Hair & Beauty. In order to welcome them into the profession and unlock their skills and knowledge there would need to be an acknowledgement of their specialised expertise and possibly some sensitivity shown to their academic achievements prior to starting on the ITE. City & Guilds
- The requirement that an entrant can read effectively and is able to communicate clearly and accurately in spoken and written English and/or Welsh does not recognise that someone might do their ITT training in Welsh but teach in an English school. HEFCW

Those who said they neither agreed nor disagreed with the proposal tended to agree with the concept of the minimum criteria but with some amendments. Previous experience and performance and medical fitness were suggested for inclusion. As was the need for student teachers to be competent in the application of their subject in real world settings.

Several respondents raised the requirement for a grade B GCSE in English/Welsh and Maths. Of those who mentioned this requirement, there was an equal balance between those who supported it and those who thought the requirement was too high. A further smaller group neither supported nor rejected the requirement but noted that it had detrimental effects and should be monitored. A number of questions were also raised, asking for further clarity.

- I fully support the higher expectations that the Welsh Government introduced some years ago in respect of the minimum entry requirement of Grade B GCSE in English/ Welsh and Maths. Comparisons should not be made with England where a lower entry standard is permitted. Gary Brace
- We agree with the standards in principle but note that the requirement for candidate teachers to possess Grade B in GCSE English and Mathematics means that potentially good teachers are being lost to other parts of the UK. University of South Wales

- It is a qualification attained many years before they would go into teaching and the fact an individual secured a B rather than a C would not necessarily make them a better teacher. NUT Cymru
- The Council is aware anecdotally that the minimum qualification requirements of a GCSE grade B (or equivalent) in English and / or Welsh and Mathematics is having an effect on recruitment to programmes, given that the requirements differ in England. The Council asks the Welsh Government to keep this entry requirement under review. EWC
- The criteria include reference to mathematics without clearly outlining what this means for students that will be approaching a degree – there needs to be greater clarity here (GCSE Mathematics / GCSE Numeracy / either) as well as clarity as to what the English numbered equivalents would be. For GCSE science the recent changes that remove GCSE single science place a further barrier to potential students here, and I would argue that it is not needed for Foundation phase. Rhodri Thomas

Further reference was made about the GCSE language requirement in relation to the Welsh language. A degree of disparity or lack of clarity for those who's first language was Welsh and who wished to undertake ITE was raised.

- Byddai'n ddymunol gweld LLC yn ymgynghori'n bellach ar y disgwyliadau o safbwynt gallu yn yr Iaith Gymraeg [gan unigolion sydd yn cyrraedd graddfa B mewn Saesneg a Mathemateg yn hytrach na B mewn Cymraeg a Mathemateg] o ystyried blaenoriaethau LLC i gynyddu nifer siaradwyr Cymraeg a'r nifer sy'n derbyn addysg ddwyieithog mewn ysgolion a cholegau. Richard Parry Jones
- The requirement that an entrant can read effectively and is able to communicate clearly and accurately in spoken and written English and/or Welsh does not recognise that someone might do their ITT training in Welsh but teach in an English school. It might be better to say '... in spoken and written English, and also in Welsh if the student wishes to teach through the medium of Welsh.' HEFCW
- We welcome the continuation of the B grade at GCSE (Language), but question whether obtaining a B grade in English and/or Welsh is appropriate. Our preference would be that students obtain a B grade in both. (However, some further through needs to go into whether this is applicable only to those sitting the First Language Welsh GCSE (Language) or to what extent it can be applicable to Welsh Second Language. North and Mid-Wales Centre of Teacher Education

Those who disagreed with the proposal tended to do so because of the GCSE grade B requirement. There were some additional points raised within this group.

- The NASUWT asserts strongly that the entry requirements should refer to becoming capable and competent teachers. Further, the NASUWT questions whether the entry requirements have been equality proofed, especially but not exclusively in terms of the ability of refugees and asylum seekers to enter the teaching profession in Wales. NASUWT Cymru
- It is essential that digital competence is added to the essential criteria in order to reflect its importance in modern education. ERW

Question 7 – Do you agree with the principal that the EWC should have the power to charge a fee (which will be subject to a separate consultation) for the consideration of applications, which will be payable by HEIs participating in the accreditation process?

Agree	42%
Disagree	19%
Neither agree nor disagree	38%
Number of responses	52

Less than half agreed that charging a fee would be appropriate. Several thought the fees would help the EWC cover the additional costs resulting from the additional responsibilities and duties. The additional capacity required by the EWC would require additional funding. Respondents did not believe these additional costs should be passed on to registrants.

- City & Guilds has an internal accreditation process, with external regulation, that requires extensive consultation, development and testing before qualifications are available for delivery. Providers of City & Guilds qualifications – such as colleges and training providers - pay a fee for the approval to deliver these qualifications. City & Guilds

Those who said they neither agreed nor disagreed commented that the costs of the additional requirements should not be met by teacher’s registration fees. However, an application fee may discourage ITE providers in submitting applications for accreditation.

- If a fee were to apply, it should be paid by the partnership, not solely the HEI. Teach First Cymru
- What if schools also become involved in accreditation – would they also be expected to pay the EWC? Central South Consortium

A fifth of respondents disagreed with the proposal. For many it seemed unfair that HEI’s would bear the burden of cost as the proposals for accreditation were to be submitted by a partnership.

- If a fee were to be charged it would need to be to the partnership and not to the HEI. Partnerships would need ample advance notice of the fee levels and any changes to them in order to budget for any such costs. Wrexham Glyndŵr University

Question 8 – How could the policy under consideration be formulated or revised so that it would have positive effects, or increased positive effects, on:

Question 9 – How could the policy under consideration be formulated or revised so that it would not have adverse effects, or so that it would have decreased adverse effects, on:

(a) opportunities for persons to use the Welsh language?

(b) treating the Welsh language no less favourably than the English language?

Two questions sought views on the Welsh language. Some respondents commented that the questions were too similar and others commented ‘see above’ at the second question. Therefore this analysis will combine the two questions. Of which 44 respondents entered some narrative comments. In addition, relevant and related responses received in previous questions have been included in this section.

Over a third of those responding to these questions stressed the importance of treating Welsh and English equally noting that ITE should be made available through the medium of Welsh or bilingually as well as English. This would allow those who want to, the opportunity to use or reinforce their Welsh language skills irrespective of location. In order to meet this need, HEIs would need to be aware of the need to recruit staff who can competently develop Welsh language teaching skills across all phases and subjects.

- Student placements would need to be facilitated by high quality welsh-medium schools and supported by welsh-speaking HEI staff. NAHT Cymru
- Mae angen amlwg am ddiffiniadau cliriach yma er mwyn sicrhau nad oes yna feini prawf anghyfartal yn eu lle fyddai'n anffafriol i Gymry Cymraeg. Mae angen i'r meini prawf newydd fynd i'r afael â'r ffaith bod rheidrwydd ar unigolion sy'n dymuno gweithio yn y sector Cymraeg ar hyn o bryd brofi lefel uchel o hyfedredd yn y Saesneg cyn cael eu derbyn ar gyrsiau AGA, lle nad oes rheidrwydd o gwbl ar unigolion sy'n bwriadu gweithio yn y sector Saesneg brofi unrhyw lefel o hyfedredd yn y Gymraeg. Canolfan Gwasanaethau Cymraeg Prifysgol Cymru Y Drindod Dewi Sant

In addressing this need to make provision available for those who want to teach through the medium of Welsh, several respondents suggested that partnership submissions should be required to demonstrate the extent to which their provision is bilingual or the capacity of the partnership to deliver bilingual provision. Submissions should also be required to demonstrate clearly how they plan to recruit Welsh-speaking students, the percentage of staff (HEI) that are Welsh-speaking, and the proportion of Welsh-medium/bilingual schools in the partnership. In meeting these requirements partnership and collaboration arrangements along with careful planning would be essential. This was also thought to be in line with Professor Donaldson's recommendations on the school curriculum, for greater collaboration between English-medium and Welsh-medium schools in developing Welsh language skills. It was also suggested the Welsh Language Commissioner, Coleg Cenedlaethol Cymru and associations such as CYDAG could also be involved in supporting the process to help ensure language pathways along with the required linguistic levels are clear.

- It will be important for institutions to be able to recruit, develop and retain staff who are able to deliver ITE programmes through the medium of Welsh. This is a responsibility that could be shared with their partner schools if appropriate. The use of distance learning may provide an opportunity for Welsh medium ITE provision to be delivered in a flexible, innovative way. The Open University in Wales
- Awgrymwn yn gryf fod angen i'r canolfannau achrededig newydd feddu ar gyswllt uniongyrchol cryf â darparwyr y Cynllun Sabothol er mwyn medru manteisio ar yr arbenigedd sydd wedi'i sefydlu yn hytrach na meithrin cyfundrefn arbenigol o'r newydd. Yn atodol i hyn, credwn y dylai canolfannau newydd ddarparu cyrsiau dwys i athrawon dan hyfforddiant sy'n sicrhau y gallant wneud cynnydd o fewn cyfnod rhesymol sy'n cyfateb i'r lefelau hyfedredd sydd eu hangen arnynt er mwyn cyflawni gofynion eu swydd. Canolfan Gwasanaethau Cymraeg Prifysgol Cymru Y Drindod Dewi Sant

Several respondents made direct links to the Welsh Government's ambition for a million Welsh speakers by 2050. The role of teachers and ITE in developing bilingual citizens was seen by several as one of the key drivers of this ambition. Having an appropriate supply of teachers who can teach through the medium of Welsh was thought to be dependant on annual ITE intake targets as well as an expectation on school/HEI partnerships to support the development of the workforce through the medium of Welsh. The responsibility for supporting ITE trainees was that of both HEIs and schools, even if they were predominantly English speaking.

- 1.5. Gan ystyried y pwyslais cryf y mae'r Llywodraeth yn ei roi ar bwysigrwydd y maes yma, a'r newidiadau mawr sydd ar y gweill yn y system draddodiadol Saesneg, pam nad oes cyfeiriad at yr ymrwymadau hyn yn y meini prawf neu ddogfennaeth arall yr ymgynghoriad hwn? Dyna'r prif gwestiwn mae'n rhaid i'r Llywodraeth ei ateb. Cymdeithas yr Iaith Gymraeg
- Consideration must be given to how ITE proposals and the development of professional standards will contribute to reaching the Welsh Government's target of achieving a million Welsh speakers in Wales by 2050. This includes development of a truly bilingual approach rather than one which is wholly English or wholly Welsh. FE incorporate bilingual teaching methodology in Wales and increasingly there is a demand for bilingual learning opportunities. This will further support the official status of the Welsh language. ColegauCymru / CollegesWales
- Yn benodol, wrth bennu canolfannau wedi eu hachredu i hyfforddi athrawon mae'n allweddol bod ystyriaethau yn ymwneud â'r Gymraeg yn ganolog i'r broses o'r cychwyn, ac nad yw hyn yn cael ei ystyried wedi i'r penderfyniadau gael eu gwneud. Coleg Cymraeg Cenedlaethol
- The entry requirements could be amended to recruit a higher proportion of bilingual students each year. This could include language immersion during ITE for student, and supportive placements aiming to "turn" a certain percentage each year from within the cohort. ERW

There was also recognition amongst some that the existing teaching workforce and wider language societal language training would be required to support this ambition. Financial incentives and additional language support were mentioned as a possible means of helping people train through the medium of Welsh.

- There may need to be some positive incentives considered to attract sufficient candidates to teach through the medium of Welsh. ASCL Cymru
- Yn ychwanegol mae angen, yn gyfochrog, ehangu'r cyfleoedd sydd ar gael i athrawon sydd angen cryfhau a gloywi eu gafael ar y Gymraeg a darparu rhagor o adnoddau o du llywodraeth ganolog i'r pwrpas hwn. Richard Parry Jones
- Er mwyn cyrraedd amcanion Llywodraeth Cymru, mae'n gwbl angenrheidiol fod y systemau yn eu lle i sicrhau nid yn unig bod darpariaeth ar gael ar gyfer darpar-athrawon sy'n dymuno derbyn hyfforddiant drwy gyfrwng y Gymraeg ond bod yna ddarpariaeth ehangach hefyd i ddatblygu sgiliau iaith Cymraeg ymysg darpar-athrawon yn gyffredinol. Athro Emeritws Gareth Ffowc Roberts
- Hybu'r Cwricwlwm Cymreig yn gryf i bob hyfforddai mewn SAU ac ysgolion partneriaeth; Sicrhau bod hyfforddeion cyfrwng Cymraeg, sydd yn aml yn grwp lleiafrifol yn ieithyddol mewn grwpiau blwyddyn neu bynciol, yn cyfarfod â'i gilydd yn ffurfiol ac yn anffurfiol er mwyn codi hyder; Cynnig cymhelliant ariannol i hyfforddeion cyfrwng Cymraeg ddilyn cyrsiau gloywi iaith yn ystod eu cwrs hyfforddi. b) Sicrhau bod dogfennau hyfforddi a chyflwyniadau staff yn ddwyieithog. Yn sgil hynny, bydd angen sicrhau arian ychwanegol ar gyfer penodi cyfieithwyr i SAU. Eglwys Bresbyteraidd Cymru

In particular reference to the criteria, the omission of reference to the Welsh language was raised further.

- Yn Atodiad 2 y 'Gofynion trosfwaol', meini prawf y mae'n rhaid i bob rhaglen astudio eu bodloni, does dim sôn am y Gymraeg. Mae hynny'n rhyfeddol, o ystyried yr anghenion o ran y gweithlu a thargedau'r Llywodraeth. Cymdeithas yr Iaith Gymraeg
- Yn yr un modd, er bod y ddogfennaeth yn cyfeirio'n helaeth at waith yr Athro Graham Donaldson, eto, nid oes sôn am ei argymhelliad i symud tuag at ddysgu'r Gymraeg fel un iaith er mwyn sicrhau dilyniant iaith rhwng pob sector addysg. Dyfdol i'r iaith
- The accreditation criteria could be amended to include a requirement for English medium trainees to receive adequate training in the use of incidental Welsh in the classroom. Teach First Cymru
- Yma (a thrwy gydol y ddogfen) dylid diffinio 'llythrennedd' gan ei gwneud hi'n glir ei fod yn cyfeirio at ddwy iaith swyddogol Cymru. Mae angen sicrhau cytgord rhwng 4.2 a 4.3. Yn 4.2 mae cyfeiriad at bwysigrwydd cynnwys ystod o ysgolion (gan gynnwys amrywiaeth o ran eu maint), ac eto yn 4.3.3 mae son am gyfleusterau na fyddant ar gael mewn ysgolion bychain, gwledig. Mae rhai o'r ysgolion hyn yn cynnwys cyfleoedd da iawn i ddarpar-athrawon o ran Addysgeg a'r Iaith Gymraeg, ac mae angen sicrhau bod lle iddyn nhw yn y cynlluniau. PCYDDS
- Clarification as to whether programme-level, rather than centre-level accreditation (as appropriate) means that bilingualism will be a requirement for all programmes, including those supported by providers outside Wales. Whilst we take it as read that this should be the case, we are unclear that the criteria are sufficiently insistent on this, recognising that nothing prevents a provider outside Wales from submitting a bid. Clarification as to how Welsh language provision will be properly accounted for by the TEAB; in particular, how the TEAB will ensure appropriate, expert membership

not only by speakers of Welsh, but also by those sufficiently acquainted with the landscape of Welsh-medium provision to be able to contribute fully, and strategically. University of South Wales

Question 10 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

A range of views were expressed by 45 respondents in this last question. Some of these comments have been added to the narrative of previous sections where relevant. Where additional points have been made, these have been grouped into themes here.

Content of ITE programmes of study

Several respondents noted that the need for high quality practical and purposeful training was seen as an important factor. Strong subject knowledge, especially in the sciences, and how this was taught in the classroom were also seen as fundamental. Training appropriate to the chosen age phase of the trainee teacher was essential. However, clarity was sought about the extent to which trainees are expected to work across subject boundaries during ITE.

- Chemistry and other science subjects are practical in nature and trainee teachers should be well equipped to teach practical science and use current technologies. However, we are concerned with the additional expectation for student teachers to work across subject boundaries because ITE programmes already cover a considerable amount of content (section 5.7.1). Royal Society of Chemistry

With this in mind, one respondent stressed that the greatest emphasis must therefore be placed on ensuring that there is adequate provision of people to lead training. There are shortages of physics teachers Wales and this problem is not helped by a shortage of individuals going into teacher training.

- Any new system of accreditation will be limited in success if there are too few excellent teacher trainers to provide accredited programmes. Institute of Physics

Six commented that ITE programmes should recognise the importance and have some reference to the outdoor environment (including school grounds), health and wellbeing.

- NRW is happy to see in the detail on Page 31 of the Successful Futures report, that ethical and informed citizens will be expected to “show their commitment to the sustainability of the planet”. In future the Education for Sustainable Development and Global Citizenship (ESDGC) curriculum (or its replacement) will be the main vehicle to embed this thinking to ensure longer-term outcomes for children and young people and by using outdoor learning as a vehicle to do this the added benefits outlined in question 1 can be realised. Embedding SMNR into the curriculum will also contribute to the achievement of the well-being goals in the Well-being of Future Generations

Act and the delivery of the Environment Act and contribute to future generations of skilled workforce (including green jobs) and knowledgeable policy makers, ensuring a resilient and sustainably managed environment. Natural Resources Wales

- All practitioners also need to be competent and appropriately trained to facilitate the process of learning in the natural environment including field survey skills, ID skills, group management and risk benefit analysis. This also includes the development and use of school grounds e.g. planting for biodiversity, outdoor classroom areas, vegetable growing and water collection and recycling. Natural Resources Wales

Three respondents suggested that in light of the proposed Additional Learning Needs and Education Tribunal Bill Wales, ALN, dyslexia/SpLD (Specific Learning Difficulties) and deaf awareness should be a mandatory part of ITE. A basic level of awareness would help in the early identification and intervention for learners.

- We were pleased to note the Cabinet Secretary's response to a plenary question on 22 September: "You will be aware that the principle behind the ALN Bill is that all teaching professions should have an understanding and an ability to respond to low-impact, high-incidence rates of additional learning needs, and that has to be incorporated into the initial teacher training of our teachers. NDCS Cymru

One respondent suggested that one of the course elements should also include how qualified teachers need to behave outside of their schools in order to ensure they keep themselves protected as professionals. Another area mentioned by NAHT Cymru was the need to better utilise support staff in working collaboratively, building professional relationships and directing their work through effective planning and in-class management.

Further guidance was also sought around whether a partnership would be able to propose a four-year undergraduate programme with an integrated Master's level qualification in addition to a three-year programme. Also if there was flexibility in postgraduate delivery.

- A programme based around a two-year postgraduate diploma would enhance the likelihood of early career teachers achieving a Master's level qualification through the completion of a work-based dissertation. Wrexham Glyndŵr University

Accreditation implementation

The timescales were generally regarded (three commented) as ambitious and possibly did not allow enough time to accredit, validate and market new programmes to capacity. The impending revised QTS standards would also have implications. A further two respondents sought further detail on the format and level of detail required in the 'intent to bid' and proposal documents, together with the incentives to be provided.

- On a practical note, the proposal for a 5 yearly accreditation process may be reasonable, but interim measures to deal with unexpected events could be helpful. These can be categorised as 'major change' or 'minor change'. Minor change might be the loss of the head of the programme, which providing a suitable replacement is found, can be reviewed as a documentary process. Major change, may require a revisit. Sheila Drayton

Partnerships

Several comments were received which related to the proposed partnership arrangements. The importance of these, especially the commitment of the school and the expertise of its leaders and mentors were regarded as fundamental to the success of ITE. One respondent was concerned that some unnecessary competition might arise if different providers had similar and competing programmes accredited.

The capacity of smaller schools to become lead partner schools was raised as an issue. Without their involvement, students may not have the full range of experiences, teaching mixed-year group classes for example. In addition, a careful and well-researched assessment of the impact on learners of multiple student placements within the same school, particularly in smaller settings was advised. A limit on the number of student placements was suggested for each cohort of learners.

Further clarification was sought regarding which schools could be included in the partnerships and the role of Estyn in the process. There was also less clarity about the role of regional education consortia in the development and delivery of the programme.

- We do not believe that the current outcome-only obsessed metrics employed by Regional Consortia in Wales are broad or sophisticated enough to ensure that students are subsequently placed in the right settings to develop as excellent teachers. NAHT Cymru
- In a self-improving system, the consortia work on behalf of authorities, working closely with schools to track and monitor standards, to facilitate school to school working, to share effective practice and to broker support for schools facing challenges. They are in an ideal position to support successful ITE reform. Central South Consortium

Role of the EWC

Further support was expressed by several respondents for the role of the EWC in the accreditation process. The general view was that the regulatory body (the EWC) should also have responsibility for the professional standards of the profession it regulates. Others suggested that there should be more crossover between the schools and FE sector in relation to professional standards.

- While this proposal is strongly supported an anomaly would still exist if the EWC are required to accredit programmes of ITE while the QTS standards that underpin the programmes remain the responsibility of government. Fairwater Primary School
- We believe that it is more appropriate for the allocation of numbers (allocations for ITT recruitment) to be managed by the body which accredits ITT. We currently provide only per capita funding for ITT students, as we do for all other students. Our funding for this provision is therefore minimal. We do not think it appropriate for us to be cited as playing an important role (implying our engagement is greater than for any other provision) as the majority of the funding for this provision comes through the student fees. Given the move of accreditation to EWC, we take the view that ITE should then be like any other subject area in higher education which we fund, many of which are subject to oversight by a professional, statutory or regulatory body. HEFCW

- ColegauCymru is concerned that there is no consideration of the Further Education sector as part of this consultation. This is especially the case in light of the potential crossover between teachers and FE lecturers, with both groups now explicitly under the remit of the Education Workforce Council (EWC). Appropriate professional standards need to be developed for both the teaching and FE professions and should not be limited to *initial* teacher education. ColegauCymru / CollegesWales

England and Wales

One respondent called for there to be consistency in provision across Wales. Another suggested that the new accreditation arrangements will inevitably lead to differences between ITT and PGCE courses in Wales and England. In turn this may create problems when teachers move between jurisdictions in terms of the recognition of qualifications and the different standards each will have.

- It will be useful for authorities in both England and Wales to make information on each programme readily available to ensure that all schools are able to understand each qualification. It would also be useful to have clarity on the extent to which the 'shortfall' in initial teacher education may be addressed for those student teachers who complete a PGCE course outside of Wales on programmes that will be, by default, 'non-accredited', and how these teachers will be viewed compared to those who qualify through these accredited programmes. Institute of Physics

6. Next steps

Relevant subordinate legislation to ensure the EWC are granted additional functions of ITE accreditation and for the establishment of the Teacher Education Accreditation Committee is now being drafted. This will be subject to the approval of the National Assembly.

In addition to this summary report of responses, many of the detailed comments received are being given careful consideration by the ITE Accreditation Group (Welsh Government, Professor Furlong and the EWC). It is likely that this will result in further guidance and clarification along with a number of minor amendments to the criteria.

The accreditation criteria are currently going through a formal Equality Impact Assessment (EIA). This systematic and thorough analysis will assess the criteria against possible discrimination and promote equality.

We will continue to engage with partners. Feedback on the consultation responses will be given to stakeholders on 13 January 2017. This will also provide a further opportunity for stakeholders to raise any concerns or ask questions.

Annex: List of respondents

Organisations

ASCL Cymru	Tim Pratt
ATL Cymru	Mary van den Heuvel
Catholic Education Service	Rev Dr Philip Manghan
Central South Consortium	Mandy Esseen
Centre for Alternative Technology	Ann MacGarry
Chwarae Teg	Eira Jepson
City & Guilds	Helen Bready
Coleg Cymraeg Cenedlaethol	Dr Ioan Matthews
ColegauCymru / CollegesWales	Dr Rachel Bowen
Cwmcarn Primary School	Helen Robbins
Cymdeithas yr Iaith Gymraeg	Toni Schiavone
Dyfdol i'r Iaith	Ruth Richards
EAS	Mike Cameron and Dr Kevin Palmer
Education Workforce Council (EWC)	Hayden Llewellyn
Eglwys Bresbyteraidd Cymru	Vaughan Salisbury
ERW	Betsan O'Connor
Fairwater Primary School, Chair of Governors	Jacquie Turnbull
Field Studies Council	Joy Blizzard
General Teaching Council for Northern Ireland	Gerry Devlin
Governors Wales	
HEFCW	Dr Cliona O'Neill
Institute of Physics	Dr David Cunnah
NAHT Cymru	Rob Williams
NASUWT Cymru	Chris Keates
Natural Resources Wales	Sue Williams
NDCS Cymru National Deaf Children's Society	Debbie Thomas
North and Mid-Wales Centre of Teacher Education	Professor Malcolm Thomas and Professor Enlli Thomas
NUT Cymru	Owen Hathway
PCYDDDS Prifysgol Cymru Y Drindod Dewi Sant University of Wales Trinity Saint David	Mererid Hopwood
Real World Learning Cymru Partnership	Jane Richmond
Royal Society of Chemistry	Nicole Morgan

St. Cenydd Community School	Paul Sass
Swansea University	Professor Iwan Davies
Teach First Cymru	Jennifer Owen Adams
Teaching Council Ireland	Tomás Ó Ruairc
The Association for Science Education (ASE)	Marianne Cutler
The General Teaching Council for Scotland	Kenneth Muir
The Open University in Wales	Michelle Matheron
UCAC Undeb Cenedlaethol Athrawon Cymru	Phil Higginson
UCU University and College Union	Lisa Edwards
University of South Wales	Jamie James
University of Wales Trinity Saint David Canolfan Gwasanaethau Cymraeg Prifysgol Cymru Y Drindod Dewi Sant	Dr Lowri Lloyd
University of Wales Trinity Saint David, Yr Athrofa, the Institute of Education	Dr Dylan Jones
USCET Universities & Schools Council for the Accreditation of Teachers, Cymru	James Noble-Rogers
Welsh National Parks Brecon Beacons National Park Authority Pembrokeshire Coast National Park Authority Snowdonia National Park Authority	Dr Sunita Welch Mr Graham Peake Ms Naomi Jones
Wrexham Glyndŵr University	Dr Claire Taylor
Y Ganolfan Dysgu Cymraeg Genedlaethol Ysgol Eirias	Efa Gruffudd Jones Hayley Blackwell

Individuals

Athro Emeritws Gareth Ffowc Roberts
 Gary Brace
 J Thomas
 Malcolm Pratten
 Rhodri Thomas
 Richard Ebley
 Richard Parry Jones
 Sheila Drayton
 Steve Powell

Anonymous x5