

New professional standards for teaching  
and leadership in schools

### **Consultation**

#### **response form**

Your name: Mary van den Heuvel

Organisation (if applicable): ATL Cymru

e-mail/telephone number:

[mvandenheuvel@atl.org.uk](mailto:mvandenheuvel@atl.org.uk) ; 02920465000

Your address: 9 Columbus Walk, Brigantine  
Place, Cardiff, CF10 4BY

Responses should be returned by 4 May 2017 to:

Professional Frameworks and Standards Team  
Curriculum Division  
Education and Public Services Directorate  
Welsh Government  
Crown Buildings  
Cathays Park  
Cardiff  
CF10 3NQ

or completed electronically and sent to:

e-mail: [professionalstandardsreview@wales.gsi.gov.uk](mailto:professionalstandardsreview@wales.gsi.gov.uk)

### **About ATL Cymru**

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

### **Our response**

ATL Cymru welcomes the opportunity to respond to this consultation.

Whilst we can see that a lot of work has gone into creating the standards we would retain some fundamental concerns.

### **The length of the standards**

We would highlight that there are too many standards overall. We would point to the work currently being undertaken on FE and Work-based learning standards, which at this point seems to be more succinct and therefore much more workable for members of the profession.

Other concerns are highlighted below.

**Question 1: Do you agree that the proposed new professional standards should reflect this vision?** [i.e. the vision for teaching and leadership as outlined on page 5 of the consultation document]

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

### Supporting comments

The professional standards must reflect the vision for education in Wales and must link to the significant reforms underway. Never the less we do have some concerns.

#### **Initial teacher education**

We are particularly concerned about the formal consultation falling at such a late stage in proceedings. This means that ITE courses are using the standards for planning courses which start in September. This is completely inappropriate

#### **Social partnership**

We are disappointed that the timing of the formal consultation did not come earlier, as stated above. We are also concerned that the unions have not been more included within the process. Welsh Government has a social partnership arrangement with the unions which should have meant they were able to attend more consultation events on these standards.

#### **ALN etc**

Overall, we would also emphasise that teachers alone cannot provide excellent education for every pupil without appropriate support. For example, for a child with ALN the teacher may need support from health and / or social services in order to ensure they can help provide an inclusive education.

In England, the language of SEND has included 'highly effective teaching'. We know that this means that support staff, who often lead on some SEND interventions, have been deemed as inappropriate leads. We would be similarly concerned about the unintended consequences for the language about inclusion and teaching for all, outlined in the standards.

Whilst teachers will have the knowledge and experience to ‘differentiate’ for all children in their classroom, this would not always include all children with ALN. Should changes proposed under the ALN Bill mean more children are attending mainstream schools and / or have less support, some teachers may need extra training to help them fully access the curriculum. Teachers will also need support from health and social care services. These standards do imply that teachers are solely responsible for ALN, even if that is not the intension.

**Funding and support**

From the consultation document:

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

Will this be reciprocal – will Welsh Government fund time and resource to allow teachers to engage with research and develop their practice in the way that is envisaged? Over-all, a clear commitment to CPD is required if these professional standards are to be meaningful.

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

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

**Supporting comments**

**We agree in general, if specific concerns are met.**

**Performance management**

We would reiterate that the standards must not be used as a tool for performance management.

“facilitating progression and pointing to a clear continuum of improvement, providing teachers with the tools to effectively manage their own performance and promote effective accountability and performance management” and linking effectively with other key developmental tools such as performance management and school development planning

These two principles suggest possible changes in performance management, and a direct link between the standards and PM. We have highlighted our concerns during meetings and would be very worried about that. We would reiterate the need to separate PM and professional standards, as we understood had been assured.

### **Professional learning passport**

We would have concerns that they will not fit into the professional learning passport in their current format. The online app does not appear to have space to fill in how you have met each standard for your own records, which would seem essential.

How will the 134 page powerpoint slides be incorporated in a way that is accessible to all? Without seeing this in practice it is difficult to comment on its accessibility. We do know that the current format of the consultation document is not accessible to all.

### **Accessibility**

Following on from the extreme difficulty we had in accessing the standards in an alternative format we would highlight that accessibility for all members of the profession is key. The standards should not just be available online / in application format, but in whatever format best suits the individual teacher.

We would highlight that the online format, regardless of whether each teacher can actually access it, may not be their preferred format for digesting information and making best use of the content.

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

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

### **Supporting comments**

We are disappointed this is just one question, instead of this question relating to each of the values. Some serious questions still remain about several of the elements highlighted.

#### **Supporting CPD?**

Fundamentally we are concerned about how teachers will be supported to undertake the CPD associated with maintaining the standards, as stated above. Without a clear commitment from Welsh Government to support learning for teachers the professional standards are unworkable.

#### **Specific concerns:**

We have set out some specific concerns which must be addressed below:

The document says:

#### **“Professional entitlement**

The teacher has a professional right to be part of a school that sees itself as a learning organisation. The teacher has the autonomy to be a contributing part of a local, national and global profession and has the right to instigate and support improvements to the school to the benefit of learners.”

Whilst Huw Lewis, the former Minister said:

“Through the New Deal, I would like to offer teachers and support staff in Wales a structured entitlement to access world class professional learning opportunities to develop their practice.<sup>1</sup>”

As stated above, in the quote from Huw Lewis AM, entitlement requires more of a commitment from WG to support and fund CPD for all teachers.

#### **“Assessment**

1

<http://www.assembly.wales/Ministerial%20Statements%20Documents/New%20Deal%20for%20the%20Education%20Workforce/dat20150316-s1.pdf#search=huw%20lewis%20new%20deal>

Sustained highly effective practice:

Specialised assessment techniques are employed for identified learners, and there is a commitment to working with colleagues and **other agencies** to best meet identified needs.”

Please define other agencies. We would have concerns that leaving this too wide could go beyond the normal working expectations. Only appropriate agencies should be included.

### **“Recording and reporting**

Sustained highly effective practice:

Analysis of data and evidence enables insight and decision about provision. Records and reports enable **other interest groups** to efficiently recognise issues and to act accordingly.”

Please define other interest groups. See comment about agencies above.

“Sustained highly effective practice:

Parents and carers are given strong support in helping their child develop in terms of the four purposes. Employers and other stakeholders are actively encouraged to support the four purposes and, in particular, **the drive to build authentic experience as a natural part of learning.**”

We would question whether all phases of learning allow for this. Some employers may be focused on results for example, and we would not want the ethos of a school to impact negatively on the progression of an individual teacher – and their subsequent performance management.

**“Blended learning experiences”** and **“Real life, authentic contexts”** include significant duplication across the standards which needs to be addressed.

**“Progression in learning”** includes within it significant duplication / similarity across the descriptors which needs to be addressed.

**“Challenge and expectations”** includes within it significant duplication / similarity across the descriptors which needs to be addressed.

**“Learning outcomes and well-being”** includes within it significant duplication / similarity across the descriptors which needs to be addressed.

**“Seeking advice and support”** includes within it significant duplication /

similarity across the descriptors which needs to be addressed.

### **“Enabling improvement**

Sustained highly effective practice:

Areas of concern are accurately identified and examined in own and others’ practice. Support is sought and offered readily and a plan enacted to secure improved performance.”

This is a concern with regard to performance management. Only certain appropriate people should be involved in this. Clear guidance should be included here on what is involved.

### **“Wider reading and research findings**

Sustained highly effective practice:

There is structured engagement in an action research community and evidence of practice informed by wider reading and research findings on a national and international scale.”

We are very concerned about this. How is every school in Wales to be funded to provide opportunities for all teachers to access this – this will require significant time and resource for teachers.

### **“Professional networks and communities**

Sustained highly effective practice:

There is evidence of an active role in the wider education community with contributions to journals, conferences or learning communities.”

We would seek clarity on how every teacher is to be funded to undertake this standard. The premise of the standards is that every teacher can work towards best practice, thus it would be inappropriate should this just be for leaders. However money is needed for all practitioners to be included.

**“Continuing professional learning”** this needs to remain confidential, as a personal record, as previously committed.

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

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

**Supporting comments**

Overall there are too many standards, as already stated. Better guidance and support would be more beneficial.

“Sustained highly effective practice:

Descriptor to be met by the end of induction:  
Effort is consistently made to involve parents, carers, other partners and **stakeholders** in learner development in terms of the four purposes.”

Evidence for award of QTS:  
The importance of positive parent/carer involvement is understood and opportunities are taken to **observe and evaluate processes.**”

Please define stakeholders.

Please explain the observation process. Does this mean that parents/carers are observing teachers? Or vice versa? This is too ambiguous.

**“Offering expertise**

Evidence for award of QTS:

The teacher models an increasing repertoire of teaching techniques, as expertise emerges and flourishes, in order to inform and enhance the development of others.”

This seems a lot to ask of someone to be awarded QTS and we therefore think it would be inappropriate to include this.

**“Leading departments and phases**

Sustained highly effective practice:

Perceptive and positive contributions are made where necessary to support the work of the school wherever it is needed using expertise and experience to fulfil the aims of the school.”

This needs to be considered from a contractual position. How does this fit with planned devolution of school teachers pay and conditions (STPC) and the STPCD and current teaching and learning responsibilities (TLRs) in particular.

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

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

**Supporting comments**

We would highlight that it is not the sole responsibility of teachers and leaders to ensure their professional learning. Under the ‘New deal’, proposed by Huw Lewis AM, Minister for Education, teachers were made the offer of an entitlement to professional learning:

“Through the New Deal, I would like to offer teachers and support staff in Wales a structured entitlement to access world class professional learning opportunities to develop their practice.<sup>2</sup>”

ATL Cymru would therefore be concerned about the change in direction from Welsh Government. The entitlement to CPD is key to the new professional standards working and we look forward to learning how CPD for teachers will be supported.

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

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

**Supporting comments**

Please see general comments.

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

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

**Supporting comments**

If it can be made to work in a user friendly and accessible format. It is

---

<sup>2</sup>  
<http://www.assembly.wales/Ministerial%20Statements%20Documents/New%20Deal%20for%20the%20Education%20Workforce/dat20150316-s1.pdf#search=huw%20lewis%20new%20deal>

hard to comment on how easy it will be for teachers and leaders to engage with the standards using the PLP without seeing the final product. At the moment we have significant concerns about the way they are presented and whether this allows teachers and leaders to engage with them in an effective way.

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

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

**Supporting comments**

Without clear commitments to CPD it is difficult to see how these standards will work in practice.

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

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

**Supporting comments**

The timetable seems optimistic. We would rather it was done once and done well, rather than rushed.

Is there enough time to take into account comments before the September intake of ITE?

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

- i) opportunities for people to use Welsh
- ii) treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

### **Supporting comments**

Clear opportunities for teachers in their current roles and for those entering the profession to learn Welsh must be seen as important by the WG if they are to reach the 1 million Welsh speakers by 2050. Experienced teachers must be given more opportunities to learn Welsh, as they have a great knowledge of their specialisms and pedagogy which must not be lost.

Please see our response to the Welsh Language Strategy  
<https://www.atl.org.uk/sites/www.atl.org.uk/files/ATL%20Cymru%20summary%20of%20response%20to%20Welsh%20Language%20Strategy.pdf>

**Question 11** – Please also explain how you believe the proposed standards could be formulated or changed so as to have:

- i) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language
- ii) no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

### **Supporting comments**

Please see our answer above.

**Question 12** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: