

Department for Education
Strengthening Qualified Teacher Status and improving career
progression for teachers
9 March 2018

1. The NASUWT welcomes the opportunity to comment on the DfE consultation on strengthening Qualified Teacher Status (QTS) and career progression for teachers.
2. The NASUWT is the teachers' union, representing teachers and headteachers across the UK.
3. The consultation document sets out a range of proposed reforms to the statutory induction of new teachers and arrangements for teachers' continuing professional development (CPD). The NASUWT's observations on these specific proposals are set out elsewhere in this response.
4. However, it is important to recognise at the outset that these areas of policy relate fundamentally to the ability of the school system to recruit, retain and benefit from a highly skilled, professional teaching workforce that can secure the highest standards of educational provision.
5. Proposals in respect of induction and CPD can, therefore, only be evaluated meaningfully on the basis of a clear understanding of the

nature and importance of teacher professionalism, the extent to which these proposals will contribute to securing the sustainability of the teaching profession and the end of the ongoing teacher supply crisis and the impact of broader Government policy in this respect. These considerations are examined in further detail below.

GENERAL COMMENTS

6. The NASUWT is clear that children and young people learn best when teachers are given the time, resources and scope to make the fullest possible use of their professional talents, knowledge and expertise. An education system that does not give practical effect to this core guiding principle cannot expect to provide pupils with the full range of high-quality learning experiences to which they are entitled. Respect for the professionalism of teachers is a hallmark of an education system that is genuinely committed to raising standards and extending educational opportunities for all learners.¹
7. The Government must, therefore, demonstrate its commitment to teachers in words and deeds and by conferring rights on them which affirm their professional status and which are guaranteed across all public education settings.²
8. Critically, public policy constituted on this basis will reflect an understanding of teaching as a complex, multifaceted professional activity which is, simultaneously, an art, a science and a craft. The art of teaching is about being responsive and creative and developing intuitive capabilities. The science of teaching is about using research and other forms of evidence to inform decisions about how to teach. The craft of teaching is about mastering the full range of skills and practices needed by teachers to discharge their professional responsibilities effectively. This broader vision of teaching is central to

¹ NASUWT. (2013). *Maintaining World Class Schools*. NASUWT; Birmingham.

² *ibid.*

understanding its status as a profession. Conceptualisations of teacher professionalism that fail to reflect these considerations fully cannot be regarded as a coherent and credible basis upon which to establish an effective national strategy for sustaining teacher quality.³

9. It is for this reason that notions of teaching based solely on its craft dimensions, as articulated, for example, in the 2010 Schools White Paper, *The Importance of Teaching*, are inadequate.⁴ It is not disputed that effective practice requires teachers to use and develop further their knowledge and understanding of the subjects and curriculum areas they teach. It is also evident that initial teacher training (ITT), induction and CPD must give teachers the ability to apply their skills and expertise in a range of practical classroom contexts.
10. However, in light of the standing of teaching as a professional activity, these important aspects of teacher formation and teacher professionalism do not describe the totality of fit-for-purpose processes of ITT, induction and CPD. Secure subject knowledge and practical experience, while important, are insufficient to ensure that teachers can fulfil the full range of their professional responsibilities.
11. Evidence published by the Organisation for Economic Co-operation and Development (OECD) confirms that other education systems regarded as high performing and fast improving base the development of teacher workforce policy on this broader understanding of the nature of teacher professionalism. Critically, this evidence stresses that these systems adopt approaches to ITT, induction and CPD that balance and integrate practice and theory rather than emphasising one or other aspect to a disproportionate extent.⁵

³ Pollard, A. (ed.) (2010). *Professionalism and Pedagogy: A contemporary opportunity*. Teaching and Learning Research Programme (TLRP); London

⁴ Department for Education (2010). *The Importance of Teaching*. TSO; London.

⁵ Organisation for Economic Co-operation and Development (OECD) (2011). *Building a High-Quality Teaching Profession: Lessons from Around the World*. OECD; Paris.

12. The OECD suggests there are at least four areas that policymakers must attend to in the context of building a teaching profession to meet the challenges of the 21st century and maintain world-class public education systems:

- By *'making teaching an attractive profession...not just through pay, but by raising the status of teaching, offering real career prospects, and giving teachers responsibility as professionals and leaders of reform. This requires teacher education that helps teachers to become innovators and researchers in education, not just deliverers of the curriculum...'*
- By taking steps to assure for all teachers an entitlement and access to *'effective [professional] development...through longer programs that upgrade...qualifications or involve collaborative research into improving teaching effectiveness...'*
- By ensuring that *'appraisal and feedback is supportive in a way that is welcomed by teachers...lead[ing] to self-improvement and [involving] teachers in improving schools' with systems of teacher compensation that are 'fair, based on multiple measures, and transparently applied in ways that involve the teaching profession...'*
- By engaging *'teachers in the planning and implementation of reform...moving beyond consultation to involvement [and] transforming schools into learning organizations, with teaching professionals in the lead'⁶*

13. In short, policymakers must commit to establishing a system which recognises and develops teachers as professionals. A world-class school system cannot be sustained where there is no guarantee of quality professionals working in every school. A national framework of professional requirements and standards, underpinned by a framework

⁶ *ibid.*

of professional terms and conditions of service, is critical to ensuring quality for all children and young people.

14. High standards of entry into the teaching profession must be recognised as a necessity in the context of addressing the increasingly complex and sophisticated demands being placed on all teachers in meeting the challenges of teaching and learning in contemporary schools. Moreover, a clear focus is needed on the quality, breadth and depth of initial teacher education curricula to ensure that these programmes support the development of teacher quality and agency in the context of teaching and learning.⁷
15. Recruiting highly qualified students into teaching cannot be the end of the matter; the Government must also focus attention on ensuring access to high-quality professional formation and development for all teachers throughout their careers. From this perspective, the Government should make sure that:
 - public education is led by a postgraduate teaching workforce that is educated and professionally accredited to nationally agreed standards;
 - all teachers working in state-funded schools must be in possession of QTS;
 - teacher education equips all teachers to demonstrate deep theoretical and empirical knowledge and high cognitive and intellectual skills to meet the learning needs of children and young people;
 - programmes of initial teacher education provide teachers with the conceptual knowledge and capacity to be reflexive practitioners who will continue to develop, apply and evaluate

⁷ Menter, I., Hulme, M., Elliot, D. and Lewin, J. (2010) *Literature Review on Teacher Education in the 21st Century*. Edinburgh: Scottish Government.

subject knowledge, theory and teaching methods to meet the developing and differentiated needs and aspirations of pupils;

- new entrants to the teaching profession benefit from structured programmes of support, which enable them to consolidate and extend the skills, knowledge and understanding acquired during initial teacher education in the context of their work as qualified practitioners;
- the leadership of teaching and learning in schools is undertaken by lead professionals who are qualified and accredited as teachers;
- all teachers and school leaders can commit to participating in their own ongoing professional learning, with an entitlement to regular, high-quality CPD that enables them to develop their professional knowledge and expertise, including through their contribution to educational research and development; and
- teacher collaboration and collegiate working practices are supported and encouraged within classrooms and faculties, both within and across schools.⁸

16. In light of these fundamental responsibilities of Government in respect of the teaching workforce, the NASUWT notes with profound concern that the consultation document does not propose to address significant existing flaws in current policy.

17. In particular, the DfE will be aware of the NASUWT's ongoing concern at the Government's failure to secure for all children and young people their right to be taught by a qualified teacher. The permissions granted to schools in the state-funded sector since May 2010 to engage teaching staff without QTS, effectively de-regulating the teaching profession, remain entirely inconsistent with any meaningful commitment to maintain and further enhance the quality of educational

⁸ NASUWT (2013). *op.cit.*

provision. Furthermore, the Union remains deeply concerned that the impact of such deregulation has been to contribute to heightened job insecurity and job loss for teachers, together with worsening pay and conditions of teachers in service. These concerns remain at the centre of the NASUWT's national trade dispute with the Government.

18. It is also regrettable that some of the proposals in the consultation document continue to emphasise a voluntarist approach, in which schools are exhorted to take action but are placed under no effective obligation to do so. While the NASUWT recognises that local flexibility is important to allow for professional development-related policies and practices to be tailored to particular circumstances, the Union is clear that such flexibility must be exercised within a national framework of common expectations and entitlements.
19. It remains clear that the ongoing absence of a system-wide workforce strategy remains a significant impediment to addressing these and other shortcomings, including those related to teacher supply and remuneration.
20. The NASUWT, therefore, restates its call for the DfE to take appropriate steps including through the strengthening of regulatory safeguards to ensure that all children and young people are guaranteed access to their universal educational entitlements, regardless of the school they happen to attend or the locality within which they happen to live.
21. Furthermore, the Union remains concerned that the DfE's existing policy and strategy for teachers is not compliant with the international obligations endorsed by the UK Government as set out in the ILO and UNESCO Recommendations concerning the Status of Teachers. The NASUWT urges the Government to take the necessary steps to ensure that these international standards are complied with fully. The Union would welcome the opportunity to work with the DfE to that end.

22. While the NASUWT recognises that the current consultation is focused specifically on induction and career-long CPD, it is important to acknowledge that a coherent teacher workforce strategy, focused on securing the professional status of teaching, must also establish and maintain an effective system of ITT.
23. To this end, the DfE must ensure that ITT should be flexible and offer different training routes into teaching in order to be genuinely accessible to the broadest range of graduates. The NASUWT has always understood that to achieve this objective, the ITT system should be comprised of diverse forms of provision, including school-centred ITT, operating with a common quality standards framework.
24. In this context, the NASUWT remains concerned by the support provided for school-centred ITT through the DfE's School Direct and Teaching Schools programmes. As the DfE's interim evaluation of the Teaching School programme confirms, limited funding to support the establishment of school-led ITT provision in Teaching Schools has created significant pressures on quality and programme delivery in a significant proportion of settings.⁹
25. It is not clear that levels of support for Teaching School Alliances are sufficient to ensure that they can undertake the full range of ITT-related roles and responsibilities allocated to them. As a result, participating schools continue to experience pressures to divert resources away from other core areas of activity to sustain their ITT provision. The NASUWT is concerned that schools are adding an increasing range of ITT-related functions to the existing responsibilities of their staff and are expecting them to discharge these responsibilities without access to adequate training or support. As a result, the working conditions of

⁹ Gu, Q.; Rea, S.; Hill, R.; Smethem, L. and Dunford, J. (2014). *Teaching Schools Evaluation: Emerging issues from the early development of case study Teaching School Alliances*. DfE Research Report 332 ([https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/302659/RR332 - Teaching schools Evaluation.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/302659/RR332_-_Teaching_schools_Evaluation.pdf)), accessed on 08.03.18.

staff in Teaching Schools are being undermined, as is their ability to provide effective support to teachers in training. Similar considerations also apply to the implementation of Teaching Apprenticeships that will also give principal responsibility for ITT provision to schools.

26. As part of the work to develop a teaching workforce strategy advocated in this response, the DfE must, therefore, take purposeful action to ensure that the organisation of ITT provision meets consistent standards, whether delivered through school-centred ITT routes or otherwise.

SPECIFIC COMMENTS

Reforming QTS

27. Currently, in almost all instances, QTS is awarded following successful completion of an accredited programme of ITT.¹⁰ It is also presently the case that while all QTS-holders who gained this status after 1999 must complete a programme of statutory induction to be permitted to be treated as possessing this status on an ongoing basis, there is no difference in the currency of QTS held pre- and post-induction. All newly qualified teachers (NQTs) undertaking induction are regarded as possessing QTS and are afforded a status equal to all other QTS-holders.
28. For this reason, it is important to note that the statement in the consultation document that NQTs are not 'fully qualified' under present arrangements until they have completed their induction is not accurate. It is, therefore, essential that the DfE develops policy in this area on the basis of an understanding of the equal professional status of all QTS-holders.

¹⁰ It is recognised that there are additional circumstances in which QTS can be awarded through, for example, the Assessment Only route managed by the National College for Teaching and Leadership.

29. The consultation document confirms the DfE's intention to defer the award of QTS until the point at which NQTs have completed their induction. The NASUWT notes that under these proposals, individuals entering the profession after the completion of ITT would be granted a provisional form of QTS.
30. The DfE has also set out its intention to implement this proposal alongside an increase in the statutory induction period from one to two years.
31. The NASUWT has longstanding concerns about the quality of support that new teachers receive during the current induction period, as well as the support that recently qualified teachers can access post-induction.¹¹ These concerns also continue to be reflected in the outcomes of DfE-commissioned research into new teachers' experiences.¹²
32. There are significant considerations that would need to be addressed by the DfE before steps are taken to implement the specific proposal to extend the statutory induction period.
33. In particular, it is not clear why extending the induction period would necessitate giving NQTs a professional status different to that of all other teachers. As the DfE notes, the Carter Review of ITT identified examples of schools where effective support for new teachers, both during and post-induction, is provided, demonstrating that the award of QTS on successful completion of ITT, rather than post-induction, is not, of itself, a barrier to good practice.

¹¹ Owen, K.; Broadhurst, K and Keats, G. (2009). *Sink or Swim? Learning Lessons from Newly Qualified and Recently Qualified Teachers. A report for the NASUWT*. NASUWT; Birmingham.

¹² Pye, J.; Stobart, R. and Lindley, L. (2016). *Newly Qualified Teachers: Annual Survey 2016: Research report*. Available at: (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/570147/NQT2_016_National_Survey_FINAL.pdf), accessed on 22.02.18.

34. In respect of the proposed award of some form of provisional status for teachers on completion of induction, the consultation document observes that comparable arrangements are in place in other professional contexts, including medicine and law. The NASUWT accepts that this is the case and that these practices are associated with supporting transition between training and full occupational practice.
35. However, the NASUWT made clear in its response to the DfE's consultation on its *A World Class Teaching Profession* proposals, undertaken in 2015, that other professions identified by the Government as meaningful comparators have statutory and contractual safeguards to their professional status that the Government currently denies to teachers. These safeguards include a system of compulsory registration, as well as practice requirements that mandate the possession of accredited professional status. Until such arrangements are in place for teachers, it is not reasonable to cite practice in other sectors to justify the introduction of a form of provisional professional status.
36. As the DfE acknowledges, the introduction of a provisional form of QTS awarded prior to the completion of induction may act as a deterrent to graduates considering teaching as a career. The NASUWT shares this concern in light of the lack of professional safeguards noted above and notes its particular pertinence in the context of the current teacher supply crisis.
37. The potential implications of the introduction of a provisional form of QTS for the terms and conditions of new teachers also give rise to legitimate grounds for concern. The Union notes the DfE's view that, under its proposals, teachers undertaking induction would continue to have the same rights and protections that NQTs possess currently, including an entitlement to be paid as QTS-holders and the ability to access pay progression on the same basis as other teachers.

38. While the NASUWT recognises that, in the case of maintained schools, it would be possible to amend the School Teachers' Pay and Conditions Document (STPCD), the (School Teachers' Appraisal) (England) Regulations 2012 and other relevant guidance to this effect, it notes that the DfE has no effective control over terms and conditions of employment in other settings in which induction may be undertaken. Such settings include academies, free schools, independent schools as well as further and sixth form colleges. There would, therefore, be a genuine risk that some employers in these sectors may seek to use the possession by new teachers of a provisional form of QTS to impose detrimental terms and conditions of service on them and that the Government would have no ability to prevent the introduction of such practices.
39. Further, in schools of all types, NASUWT research confirms that, in a substantial proportion, teachers continue to have their legitimate contractual and statutory expectations of pay progression denied.¹³ In light of their current treatment of teachers, these schools may elect to use the fact that new teachers one year into induction would not yet possess QTS to impose detrimental pay arrangements on them.
40. Implementation of this proposal could also lead some parents to conclude that teachers possessing a provisional rather than a full form of QTS have a lower professional status. As a result, schools may experience pressure from parents not to deploy such teachers to teach their children on the erroneous grounds that they are not fully qualified.
41. It is, therefore, evident that the consultation document does not set out a sufficiently clear rationale for delaying the award of QTS until the completion of induction. As a minimum expectation, the DfE must set out more clearly why it believes that an extension of the induction period would necessitate the introduction of a provisional form of QTS

¹³ NASUWT (2016). *Pay and Pay Progression Survey*. Available at: (<https://www.nasuwt.org.uk/uploads/assets/uploaded/5167eafa-5a91-4944-a21aff6c9e775c18.pdf>), accessed on 22.02.18.

and how, if introduced, the issues identified above would be addressed.

Securing the rights and entitlements of NQTs and the role of appropriate bodies

42. The DfE is right to acknowledge that, in order to be meaningful, any extension of the period of statutory induction must be accompanied by a significant enhancement of the rights and entitlements of NQTs, as well as enrichment of induction programmes. The NASUWT is clear that it would be difficult to justify merely extending the current induction period without a corresponding improvement in NQTs' experience of induction and without also guaranteeing the rights of NQTs during induction regarding professional time, development, advice and support.

43. Particular attention in this regard must be paid to ensuring that NQTs' statutory rights and entitlements are secured in practice. In the context of the current induction framework, it is evident that too many NQTs are not able to benefit from the existing rights set out in relevant regulations and guidance.¹⁴ The most recent DfE-commissioned survey of NQTs' experiences highlights the extent of legitimate concern in this respect. The survey confirms that a significant proportion of NQTs are unable to access fundamental statutory rights, including those relating to reductions in timetabled teaching time, obtaining support from an induction tutor, receiving feedback on teaching and observations and accessing effective professional training and development opportunities.¹⁵ It is, therefore, evident that any extension to NQTs' statutory rights will not impact positively on all NQTs' experience of induction without the introduction of more effective means of securing compliance than those in place at present.

¹⁴ Pye *et al.* (2016). *op.cit.*

¹⁵ *ibid.*

44. This consideration invites reflection on the role of appropriate bodies in monitoring and enforcing setting-level adherence to regulations and guidance.
45. Current arrangements give appropriate bodies statutory powers and duties to ensure that all NQTs gain access to their legal rights. However, it is clear that, given the extent of non-compliance with statutory provisions noted above, these duties are not being discharged on a consistently acceptable basis.
46. The NASUWT's extensive experience of engagement with appropriate bodies in cases where schools and other settings do not comply with these provisions highlights fundamental shortcomings in existing compliance systems.
47. In particular, changes made in 2012 by the DfE to the regulatory framework for induction, which permitted settings to choose their appropriate body and that introduced a traded service model for appropriate body services, have proved profoundly problematic. As the NASUWT noted at the time these reforms were first proposed, the creation of a quasi-market in appropriate body services, which, in effect, allows regulated institutions to choose their regulators, disincentivises appropriate bodies from challenging settings that are non-compliant with their statutory duties. The practical impact of this model has been to discourage appropriate bodies from intervening in cases where induction is not being managed effectively due to concerns that if they were to do so, some settings would procure services from an alternative provider.
48. This relationship between settings and alternative bodies is not acceptable. The current consultation provides a timely opportunity for the DfE to work with the NASUWT to develop a revised model of appropriate body-led local regulation that would address these concerns.

49. Such a model must end settings' ability to select their own appropriate body. It would also need to set out common, minimum expectations about how appropriate bodies should exercise their statutory functions and ensure that they have adequate resources and personnel to undertake these functions effectively.
50. The absence of any meaningful scrutiny and oversight by the DfE of appropriate bodies' work in discharging their core statutory duties is a significant weakness in the current induction framework. As part of its review of induction arrangements, the DfE should develop systems and structures to audit the efficacy of appropriate bodies in undertaking their responsibilities and that, if required, would compel them to use their legal powers to secure NQTs' rights and entitlements.

CPD for new teachers

51. The NASUWT welcomes the recognition in the consultation document of the importance of the induction period in building on the skills, knowledge and expertise that NQTs gain through ITT programmes.
52. As the DfE acknowledges, this important dimension of induction depends on all NQTs gaining access to a structured CPD offer, which builds on the national core content frameworks for ITT, and thereby ensures greater coherence of experience for trainee teachers transitioning into induction.
53. However, it is important to note that ITT and induction represent distinct stages in teachers' professional learning journeys, given that the latter serves as a means by which NQTs apply the expertise gained in the former through a period of sustained employment as a qualified teacher.
54. It is for this reason that the DfE's decision in 2012 to replace the previous suite of progressive professional standards with a single set of Teacher Standards that apply during ITT as well as during and after

induction, was highly regrettable. This feature of the current professional standards framework continues to create difficulties in establishing clear and consistent distinctions between ITT and induction that were secured through the arrangements that this framework replaced.

55. The NASUWT, therefore, restates its call for the DfE to work with the Union and other relevant stakeholders to develop a revised system of professional standards that provides more effective support for ITT-to-induction transition.

56. While the incoherence of the current standards framework remains a significant barrier to establishing an effective CPD entitlement for NQTs, it is encouraging that the DfE has acknowledged that such an entitlement is important. The NASUWT agrees that the entitlement should address development domains including:

- subject and curriculum knowledge;
- evidence-based pedagogy, including subject-specific pedagogy;
- use of and engagement with evidence;
- behaviour management;
- use and understanding of assessment; and
- supporting pupils with special educational needs and disabilities (SEND).

57. However, to secure the breadth of NQTs' CPD experience and its relevance to the professional roles and responsibilities of teachers, other critical areas, including equality and diversity, health and safety and safeguarding, must also be included as a key element of the professional development entitlement of all beginning teachers.

58. The NASUWT shares the DfE's view that any CPD framework should provide elective option as well as mandatory content in order to provide NQTs with an opportunity to pursue areas of personal interest and relevance. The Union welcomes the acknowledgement in the

consultation document that considerations relating to tackling excessive and unnecessary workload should be incorporated into all components of this framework.

59. To ensure that the CPD framework for NQTs is coherent, credible and reflective of the reality of teachers' working lives, it is essential that it is developed in collaboration with the NASUWT.
60. The form, content and delivery of the framework should reflect the broad principles of effective CPD set out in further detail elsewhere in this submission. The delivery models used in such a framework are also crucial. Given the proposal that the framework should apply to all new teachers and become a mandatory element of induction programmes, it would not be appropriate to use a model wherein schools and other providers are licensed to develop materials and programmes on a similar basis to that associated with National Professional Qualifications (NPQs). Whatever the merits or otherwise of the NPQ model, it has been developed in the context of elective rather than statutory CPD. In light of the intention for the CPD framework to represent a common entitlement for all new teachers, it is essential that minimum content and delivery standards are in place in all circumstances. For this reason, the NASUWT is clear that it would be most appropriate for a model to be developed in which the DfE commissions and oversees the delivery of all elements of the framework directly.
61. Consideration would also need to be given to ways in which a common CPD entitlement would be resourced. It would be entirely unacceptable for NQTs to be denied access to this entitlement as a result of settings asserting that they are unable or unwilling to fund it fully. The DfE must, therefore, establish a resourcing mechanism that either ensures that funding given to settings to support the framework is securely ring-fenced, or that involves direct DfE-funding of provision. The NASUWT

would welcome the opportunity to engage further with the DfE to consider the relative merits of both options in further detail.

Mentoring new teachers

62. The consultation document is right to emphasise the critical importance of mentoring to successful induction programmes. However, as noted above, it is not the case currently that effective mentoring arrangements are in place in every setting.
63. Research commissioned by the NASUWT has highlighted issues in this respect related to the lack of time and resources given to mentors to undertake their roles and responsibilities, a lack of support from senior leaders and the variable quality of mentor training and development.¹⁶
64. It is essential, particularly within the context of an expanded induction period, for the DfE to take effective action to ensure that these existing shortcomings in mentoring arrangements are addressed.
65. Specifically, it is important that mentors can benefit from high-quality ongoing training and support. Given the statutory nature of mentor roles and responsibilities, training and development should be commissioned and overseen directly by the DfE. Course content, assessment frameworks and delivery models for mentor training should be developed in consultation with the NASUWT.
66. The DfE should also work with the NASUWT to develop clearer common expectations in respect of mentor training and support. These expectations must confirm that settings give mentors the time, space and resources required to work effectively with the new teachers for whom they are responsible. This framework of expectations should also confirm that mentors must be rewarded appropriately for this work.

¹⁶ Owen *et al.* (2009). *op.cit.*

67. As part of a review of mentoring arrangements, the DfE should mandate, empower and resource appropriate bodies to monitor setting-level compliance with these requirements and mandate them to prevent non-compliant settings from employing NQTs.
68. The consultation document confirms the DfE's interest in dividing responsibility for the support and assessment dimensions of the current mentor role between different individuals.
69. The NASUWT believes that this suggested reform is worthy of further consideration and looks forward to engaging further with the DfE on the detail of its proposals in this respect. In particular, it will be important to ensure that arrangements are established that ensure that the advice on teaching and learning strategies given to NQTs by mentors coheres with assessors' evaluations of their progress towards the relevant standards.
70. The way in which both roles are conceptualised would also be a critical consideration in the development of this policy. While assessors would have responsibility to appropriate bodies to evaluate whether or not relevant standards had been met by NQTs, it would not be appropriate for this role to be reduced to one merely focused on assessment of NQTs' performance against these standards. For this role to be undertaken effectively, it would remain important for the assessor to engage in professional dialogue with NQTs about evaluations of their performance to identify how areas of emerging strength could be consolidated as well as how development points could best be addressed. To this extent, the assessor role would need to incorporate a coaching dimension so that it could make provide practical support to NQTs' professional progress and development.
71. The mentor role would be distinct from that of the assessor in that it would be focused on providing NQTs with an opportunity for honest, discreet and informed discussion about matters of professional

importance to them. While a significant proportion of this role would centre on the provision of practice-related advice and guidance, it would also be means by which NQTs could share their perspectives and concerns with a trusted colleague candidly and without fear of being subject to adverse judgements, whilst enabling NQTs to continue to develop and deepen their professional identity and confidence.

72. Both roles would require a broad and wide range of skills and attributes, emphasising the importance of effective initial and ongoing development and training. To be effective, both roles would also need to be established within settings' staffing structures in a way that would reflect their equal status and importance and give holders the ability to use their professional judgement to make decisions about the organisation of NQTs' work and the provision of induction-related support.

Development time for new teachers

73. As the DfE's NQT survey confirms, excessive workload burdens represent a significant barrier to securing effective induction experiences. It is for this reason that the minimum reduction of 10% in NQTs' timetabled teaching time set out in current regulations and guidance must be maintained. As noted above, securing settings' adherence to these requirements must be prioritised by appropriate bodies.
74. The NASUWT is clear that any extension in the induction period must take place on the basis that NQTs' entitlement to a reduction in their timetabled teaching time will be retained across the entire induction period.
75. While reductions in teaching time remain a critical element of induction programmes, it is also important that NQTs are provided with a working environment that recognises that their principal focus during induction

is to work towards the relevant induction standard, and that gives them effective support to do so.

76. Although the current statutory guidance confirms that NQTs should not be deployed in roles that 'involve additional non-teaching responsibilities without the provision of appropriate preparation and support', feedback from NQTs indicates that this requirement is often ignored by settings. In the NASUWT's experience, NQTs are too frequently given additional responsibilities with no, or inadequate, support.
77. The DfE should, therefore, introduce explicit provisions in regulations and guidance that would prevent such activities being allocated to NQTs in any circumstances and thereby give new teachers the scope to concentrate their time and effort on developing their classroom practice, unencumbered by other tasks that could distract them from this critical focus.

Induction: additional considerations

78. The consultation document invites views on whether current restrictions on the ability of NQTs to undertake short-term supply work should be retained.
79. The NASUWT recognises that NQTs can face difficulties in securing employment that allows them to begin induction. The Union further recognises that, given the importance of to all NQTs of accessing an effective and tailored package of support on entry to the profession, it should be the aim of induction policy to ensure that NQTs cannot work indefinitely in posts that do not allow them to benefit from this support. The NASUWT remains clear that adoption of the approach in place in Scotland, in which new teachers are guaranteed employment for the duration of their induction, represents the most effective means by which concerns about the barriers to accessing induction experienced

by some NQTs can be addressed. The NASUWT continues to call on the DfE to introduce such arrangements in England.

80. It must be acknowledged that the fact that circumstances persist in which teachers are not able to secure inductable posts is a direct consequence of the Government's failure to regulate the deployment of NQTs effectively. If the DfE is to retain a limit on short-term supply work, it must also ensure that NQTs are not placed in a position where such work represents their only option of securing paid employment as a teacher. A limit on NQTs' ability to undertake short-term supply work without a guarantee that they can secure an inductable post is, therefore, unreasonable.
81. The consultation also offers the DfE the opportunity to address other longstanding concerns in relation to the statutory induction framework.
82. Particular issues can be identified in respect of the use of capability procedures with NQTs. In cases where NQTs' perceived underperformance is particularly serious, the NASUWT recognises that it may be appropriate for headteachers to consider the use of capability procedures and that these procedures may result in dismissal before the completion of the statutory induction period. However, it is essential to recognise that use of capability procedures for NQTs takes place within a highly specific context in which dismissal results not only in the termination of their current employment but also in a failure to complete induction, barring NQTs from future employment in any post for which possession of QTS is a requirement. It remains, therefore, entirely unacceptable that since 2012, statutory guidance has not made clear that use of capability procedures should only be considered in those extreme circumstances in which there are compelling grounds for concern that the continued employment of an NQT would put the educational wellbeing of learners at risk.
83. Settings must also be obliged to ensure that the performance of NQTs in such circumstances has been monitored in line with provisions set

out in statutory guidance and that NQTs have been advised about the aspects of their practice that are causing concern before capability proceedings are considered. Statutory guidance should require settings in cases of this type to establish a reasonable period of structured support, in which NQTs felt to be at risk of not meeting the relevant standards are given every opportunity to improve.

84. In respect of the range of settings within which induction can be served, the NASUWT notes that regulations and guidance were amended in 2012 to allow induction to be undertaken in pupil referral units (PRUs) and other comparable institutions. As it noted at the time, the Union was concerned that such settings' distinctive operating context, in which pupils often display particularly challenging behaviour and may only be present in a setting for a short period of time, mean that their circumstances are atypical and may, therefore, not provide a suitable environment within which to undertake induction. Given that a significant period of time has elapsed since this provision was introduced, it would be timely for the DfE to work with the NASUWT and other relevant stakeholders to investigate whether PRUs and other similar settings have been able to offer suitable induction experiences to NQTs and whether guidance and regulations should be amended in this respect.
85. The NASUWT continues to note with concern the permission given to settings since 2012 to reduce the length of the statutory induction period from three terms to one term. The Union notes that this provision was introduced by the DfE on the basis that it would take account of the circumstances of NQTs with 'significant and proven teaching experience gained from outside the maintained sector.'
86. This provision, and the rationale given to justify its implementation, not only reflects a misconception of induction as a punitive process, from which exemption should be regarded as beneficial to NQTs, but also gives an inappropriate degree of discretion to settings to determine the

circumstances within which the length of the induction period might be reduced.

87. Experience from the NASUWT's representation of NQTs suggests that instances arise as a result of this provision in which some settings apply it to avoid their legal duty to provide a full induction experience to all the NQTs they employ. While NQTs retain a right to insist upon access to the full period of statutory induction in instances where it is suggested that this period should be reduced, cases continue to arise in which many NQTs are reluctant to assert this right, given that they are dependent on headteachers' recommendations that they have met the standards required to pass induction.
88. The DfE should, therefore, review this element of the statutory guidance with a view to its amendment. It should be noted that retention of such a requirement would be wholly inconsistent with the DfE's rationale for its proposal to increase the overall length of the induction period.
89. The DfE should also take the opportunity to address an apparent anomaly in the induction framework in respect of the way in which part-time service counts towards induction.
90. Currently, statutory guidance states that 'the minimum period of employment that can be counted towards completion of the induction period (for both full-time and part-time NQTs) is one term (based on an institution that operates three terms for an academic year).' This wording appears to suggest that a part-time placement lasting for one term will count, pro-rata, towards the total induction period, which in most circumstances must be the equivalent of one academic year in length.
91. However, this provision appears to create difficulties in practice when an NQT moves from one part-time position of exactly a term's duration in one setting to another part-time position of the same duration in a

new setting. While an interim assessment must be made if an NQT leaves a post after more than one term in a setting, there is no requirement for such an assessment to be made if the post has been held by the NQT for exactly one term. In this situation, there is no obligation for an interim assessment to be produced, creating significant issues in the new setting undertaking the formal assessment of the NQT required by statutory guidance.

92. As a result, appropriate bodies often conclude that such periods of part-time working, when no previous interim assessment is available, should not count towards induction.
93. This element of the guidance is ambiguous and places appropriate bodies in a difficult position, in which they have to balance a strict interpretation of the provisions in guidance in respect of the eligibility of a term's part-time employment as inductable with the practical issue of a setting being required to undertake a formal assessment of an NQT without meaningful information about that NQT's prior progress towards the relevant induction standards. Such circumstances also create issues for the NQTs concerned who, quite reasonably, seek clarity on the way in which statutory guidance should be interpreted in cases of this type.
94. The NASUWT would, therefore, welcome the opportunity to engage directly with the DfE to set out its concerns in more detail and ensure that statutory guidance and regulations are revised so that they are clearer in this regard.

Towards an effective approach to career-long CPD

95. The NASUWT welcomes the DfE's recognition of the need to secure a more effective, system-wide approach to career-long CPD.
96. Ensuring that teachers have access to high-quality CPD is a critical element of any effective teacher quality strategy. Evidence continues to

confirm that teachers in England are less satisfied with their experience of professional development than teachers in other education systems identified by the OECD as particularly effective.¹⁷

97. It is clear that the DfE has an opportunity to develop an alternative approach to teacher workforce policy to address shortcomings in current arrangements. This alternative approach should include ensuring that:

- there is a long-term, planned approach to professional development in schools through which participants are given meaningful opportunities to reflect on their practice;
- there is a clear focus on the objectives that professional development is intended to secure that is shared by participants, senior leaders and those responsible for leading or supporting activities and programmes;
- approaches to professional development activities and programmes are relevant to participants and are tailored sufficiently to their individual needs and interests;
- professional development is led and supported by personnel with appropriate skills and experience from within and beyond participants' schools;
- professional development is informed by high-quality evidence about effective teaching and learning;
- programmes and activities take effective account of the existing knowledge and experience of participants; and
- professional development is subject to meaningful and rigorous evaluation.

¹⁷ Mickelwright, J.; Jerrim, J.; Vignoles, A.; Jenkins, A.; Allen, R.; Ilie, S.; Bellarbre, E.; Barrera, F.; and Hein, C. (2014). *Teachers in England's Secondary Schools: Evidence from TALIS 2013*. Available at: [https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322896/RB302 - TALIS_report.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322896/RB302_-_TALIS_report.pdf), accessed on 24.02.18.

98. Currently, responsibilities for the organisation and procurement of CPD rest with individual schools and the employers of teachers. It is, therefore, essential that schools and employers can act as informed consumers of professional development goods and services if CPD is to provide all teachers with relevant and meaningful opportunities to develop and enhance their skills and expertise.
99. The Government should work to provide support to schools on the issues they need to consider when securing CPD-related goods and services from external providers. Schools should also be helped to engage with providers in ways that ensure that teachers can access tailored professional development programmes and activities. The use of generic packages that are unable to address the individual needs of teachers and of the settings within which they work should be avoided. These issues are considered in further detail below.
100. It is important that schools demonstrate an active understanding of the need to ensure that all teachers can access professional development opportunities on an equitable basis and in ways that do not result in excessive workload burdens or undermine their ability to secure a reasonable work/life balance.
101. In this context, the NASUWT welcomes the DfE's interest in exploring how a system of sabbaticals for teachers might be established. The Union has campaigned consistently for the introduction of such an entitlement, in which teachers would be permitted to access sabbaticals on the basis of one year for every seven served. Provision for sabbaticals would allow teachers to take greater control and responsibility for their own CPD and give them time within which to embark on relatively substantial training and development projects. The NASUWT looks forward to engaging directly with the DfE on this important dimension of a revised framework for teachers' CPD.
102. In addition to the reconsideration of current approaches to induction and CPD, the NASUWT remains clear that if the DfE is to fulfil its

commitment to strengthening QTS, it must re-establish minimum, system-wide arrangements for teachers' remuneration and appraisal.

These arrangements should include:

- ensuring that there is a fair, transparent and consistent pay policy that recognises and rewards teachers as highly skilled professionals in every school;
- levels of pay that will contribute towards the maintenance of teacher supply by supporting the recruitment and retention of highly skilled professionals;
- pay and performance management arrangements that cohere with CPD opportunities and frameworks to promote career and pay progression for teachers; and
- pay and reward structures that accord sufficient status to those career progression routes focused on classroom practice as well as those related to leadership and management responsibilities.

103. Moving towards a more effective model of teacher professionalism, formation and development will require a multi-faceted policy response and recognition that no single policy intervention will be sufficient to secure this objective.

104. However, the NASUWT maintains that there is a compelling case for moving towards a Masters-level teaching profession as part of an overall strategy for strengthening QTS. A Masters-level teaching profession should be the Government's goal for all teachers working within public education, provided it is underpinned by guaranteed access and entitlement to high-quality initial teacher preparation, career-long CPD and appropriate remuneration, established on the principles set out above.¹⁸ The development of policy on this basis would remove the requirement for ITT prequalification skills tests and

¹⁸ Sahlberg, P. (2012) *Finnish Lessons: What Can the World Learn from Educational Change in Finland*. New York: Teachers College Press.

meet the aspiration that only the most successful graduates enter the profession.

105. The form and content of any Masters programme would be central to the contribution it could make in this context. Traditionally, Masters-level study has been secured through participation extra-mural activities undertaken in teachers' own time. While such programmes can be extremely worthwhile, they are also subject to some significant limitations, including;

- requirements to participate in evening, weekend or holiday-time learning sessions, generating significant barriers to access for teachers with family or caring commitments;
- managing study in the context of current high teacher workloads;
- difficulties in finding programmes that cohere effectively with teachers' work in the classroom; and
- the often prohibitive costs of course entry and materials.

106. The Government should, therefore, explore the scope for developing a Masters programme which takes place in the classroom, in school, in real time – enabling it to be genuinely accessible to all. While the NASUWT notes that the consultation document references the DfE's interest in helping teachers to access Masters-level study, it is critical that work in this respect is progressed on a coherent and strategic basis. The Union has identified detailed criteria for the content, format, delivery, resourcing and organisation of effective Masters-level programmes for teachers. The NASUWT would welcome the opportunity to engage directly with the DfE on the principles that should guide the development of policy in this area

Securing equality of opportunity in the provision of CPD

107. It is essential that strategies for the professional formation and development of teachers are taken forward on the basis of a clear understanding of the need to promote equality and diversity and tackle discrimination and prejudice. These considerations must be embedded in the formulation of strategies from the outset and not after the substance of policy has been determined.
108. It is clear that the matters addressed in the consultation document in respect of induction and professional and career development relate directly to the experiences of teachers from under-represented groups. In regard to many teachers from Black and Minority Ethnic (BME) backgrounds, research confirms that the quality of their working lives in these and other critical respects gives rise to significant and legitimate grounds for concern. Evidence commissioned by the DfE indicates that BME teachers are almost twice as likely to have left teaching after three months of entering the profession than their entry cohort measured as a whole and continue to leave at a significantly higher rate than teachers overall within two years of gaining QTS.¹⁹
109. These findings reflect the outcomes of independent research commissioned by the NASUWT on: the under-representation of BME teachers across the education system, particularly at leadership level; the less favourable treatment they experience in comparison with their peers in respect of pay and pay progression; and their ability to benefit from equitable performance management systems that allow them to gain access to high-quality CPD.²⁰

¹⁹ Allen, R.; Bibby, D.; Parameshwaran; M. and Nye, P. (2016). *Linking ITT and workforce data: (Initial Teacher Training Performance Profiles and School Workforce Census)*. Available at:

(https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/544773/Linking_ITT_and_workforce_data_Initial_Teacher_Training_Performance_Profiles_and_School_Workforce_Census_.pdf), accessed on 24.02.18.

²⁰ NASUWT and the Runnymede Trust. (2017). *Visible Minorities, Invisible Teachers*.

Available at: (<https://www.nasuwt.org.uk/uploads/assets/uploaded/6576a736-87d3-4a21->

110. Other barriers to career and pay development can also be identified concerning women, disabled, LGBTI and older teachers. Many of these barriers are systemic in origin. For example, the widespread provision of development programmes and activities outside school hours can create significant issues for teachers with substantial family or caring responsibilities, the majority of whom are women. Evidence from the OECD's Teaching and Learning International Study (TALIS) confirms that women teachers in England with young children are less able to access professional development opportunities than their peers.²¹
111. It is important to recognise in this context that supply teachers also face significant obstacles to accessing professional development. A survey of supply teachers undertaken by the NASUWT in 2016 found that more than four in ten (43%) of respondents have no access to professional development. Of those supply teachers with such access, over half (53%) indicated that they were required to participate in activities and programmes during evenings, at their own expense or on an unpaid basis.
112. An equitable and just model of teacher accreditation, regulation, induction and development would not allow such inequalities to continue unaddressed. In the context of the ongoing teacher supply crisis, it is profoundly irrational to permit this discrimination to persist, given its implications for sustaining recruitment and retention, attracting highly skilled graduates into teaching and giving them effective opportunities to establish and enhance their professional skills and expertise for the benefit of the wider education system. It is entirely incongruous for an education system to seek, rightly, to promote equality of opportunity for learners while equality of opportunity is denied to many members of the workforce.

[837fd1a1ea4aa2c5.pdf](#)), accessed on 24.02.18.; Barnes, S.; Lyonette, C.; Atfield, G. and Owen, D. (2016). *Teachers' Pay and Equality: A Literature Review*. Institute for Employment Research; Warwick University.

²¹ Micklewright *et al.* (2014). *op.cit.*

113. It is, therefore, imperative that the DfE ensures that its work in this area is guided from the outset by the need to advance equality at setting, local and national levels more effectively than has been the case to date. This consideration emphasises in particular the importance of establishing meaningful, common statutory arrangements for teachers' performance management, including an entitlement within these arrangements for teachers to have a discussion about their professional development needs and provision.
114. These arrangements must also provide for all supply teachers to gain access to CPD on the same basis as all other teachers. As the NASUWT observed in its evidence to the Independent Review of Employment Practices in the Modern Economy (the 'Taylor Review'), the teacher labour market is making increasing use of supply staff employed through agencies on short-term and flexible contracts.²² In such circumstances, it is essential that supply teachers are included in national arrangements for early and continuing professional development if the benefits of these arrangements for these teachers and the pupils they teach are to be secured in practice.

Delivery implications of a national framework for CPD

115. A national framework for CPD must be underpinned by a clear statutory entitlement for all teachers to access high-quality professional training and development opportunities.²³ The Union, therefore, welcomes the Government's interest in exploring options in this respect and looks forward to engaging with the DfE on this critical area of policy.

²² NASUWT. (2017). *Submission to the Independent Review of Employment Practices in the Modern Economy*. Available at: <https://www.nasuwt.org.uk/uploads/assets/uploaded/0609a438-594d-441c-aa419bb82fe181f4.pdf>, accessed on 08.03.18.

²³ NASUWT. (2013). *op.cit.*

116. As the OECD notes, other jurisdictions it identifies as high performing or fast improving have developed impactful and sustainable frameworks that incorporate an entitlement to CPD for all teachers. These frameworks would represent a coherent starting point for the identification of delivery models that could be deployed effectively in the specific context of the education system in England. In particular, this examination of delivery models would need to consider how jurisdictions that have established a common CPD entitlement ensure that employers of teachers facilitate this entitlement in practice.
117. The recognition by the DfE of the need to ensure that funding for a CPD framework is secure and sufficient is also welcome. The consultation document suggests that the DfE may consider ring-fencing funding for CPD in schools where it is 'most needed.' While this proposal represents a potentially encouraging shift in the DfE's current policy position, in which schools are granted complete autonomy over how funding streams are used, it is not clear why such a system should be limited to a small selection of schools. In schools not subject to any such ring-fence, the ability of teachers to access CPD-related resources would remain at the discretion of individual schools and employers. It is difficult to envisage how a common entitlement to CPD for all teachers could be introduced securely in such circumstances.
118. Concerning the form and content of CPD programmes, the DfE places significant emphasis on securing delivery through an expansion of the NPQ programme. The NASUWT is not clear that this programme has yet demonstrated its effectiveness. In particular, the extent to which NPQs offer a consistent, high-quality learning experience for all participants has yet to be confirmed.
119. As noted elsewhere in this response, it is not apparent that a licensing-based model of CPD delivery is appropriate in the context of a policy objective of securing universal entitlements to CPD.

120. The Union notes that the DfE has commissioned research to evaluate the efficacy of NPQs. The outcomes of this research should, therefore, be used to inform further consideration of the appropriateness of the NPQ model in the development of a national CPD framework.
121. The DfE further identifies the Chartered College of Teaching as a possible means by which an expanded CPD offer might be secured. The NASUWT has engaged constructively with the College since its establishment in 2017 and recognises the extent to which it has sought to address the Union's concerns about the original principles on which the concept of the College was based. The NASUWT has set out a range of critical tests that the College must meet if it is to make a positive contribution to the future success of the education system. The Union looks forward to further progress being made by the College towards meeting these tests.²⁴
122. However, given the relatively short period in which the College has been operational, it will be important for the DfE to avoid relying to a disproportionate extent on the College's CPD provision in the development of its strategy until further evidence of the efficacy of this provision becomes available.
123. The NASUWT acknowledges that schools will continue to have principal responsibility for procuring and organising CPD provision for teachers. So that schools undertake this role effectively, the DfE must ensure that all schools can act as informed consumers of professional development provision.
124. The DfE must, therefore, provide support for schools in this respect through the development of materials setting out the considerations that schools need to take into account when securing professional development-related goods and services from external providers. It is

²⁴ NASUWT (2017). *A Chartered College of Teaching – Ten Key Tests*. Available at: (<https://www.nasuwt.org.uk/uploads/assets/uploaded/e1cbcca0-e608-436e-b5743fc73e55d751.pdf>), accessed on 26.02.18.

also essential that schools recognise that effective CPD provision does not require the exclusive use of externally-sourced provision, particularly attendance at courses, and that other forms of CPD can have high levels of efficacy and may represent a more efficient use of schools' resources.²⁵

125. The case for the development of a meaningful and comprehensive national accreditation scheme for CPD is well-established, given the support such a scheme would provide to teachers and headteachers in making decisions about whether externally-provided CPD is appropriate and, if so, from where it should be secured. It is, therefore, encouraging that the DfE has recognised the need to establish a means for securing such accreditation. The DfE should work with the NASUWT to develop specific proposals in this area to ensure that it allows provision to be evaluated on the basis of clear and consistent criteria.

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²⁵ Training and Development Agency for Schools, (2007). *Impact evaluation of CPD*. Available at: (http://dera.ioe.ac.uk/9686/2/impact_evaluation.pdf), accessed on 24.02.18.

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