**This response is also available in Welsh.**

Arolygiaeth Ei Mawrhydi dros Addysg a Hyfforddiant yng Nghymru
Her Majesty's Inspectorate for Education and Training In Wales

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**Ymateb i Ymgynghoriad / Consultation Response**

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| **Dyddiad / Date:** | 30.05.22 |
| **Pwnc / Subject:** | **Refreshing the Accreditation Criteria for ITE in Wales Project** |

**Background information about Estyn**

Estyn is the Office of Her Majesty's Inspectorate for Education and Training in Wales. As a Crown body, Estyn is independent of the Welsh Government.

Estyn's principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000 and the Education Act 2005. In exercising its functions, Estyn must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by education and training providers in Wales;
- Quality of leadership and management of those education and training providers;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Estyn's remit includes (but is not exclusive to) nurseries and non-maintained settings, primary schools, secondary schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning, and teacher education and training.

Estyn may give advice to the Welsh Parliament on any matter connected to education and training in Wales. To achieve excellence for learners, Estyn has set three strategic objectives:

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

**Response**

**Introduction**

We welcome this review of the Accreditation Criteria for Initial Teacher Education (ITE) in Wales. The Criteria have played an important role in ensuring ITE reform. Working with the Criteria has revealed that alongside the necessary updating to ensure currency, aspects of the document would benefit from clarification.

The original document provided a helpful steer to reform ITE in Wales, and as such, presented a vision for change. The tone of the Criteria is in stark contrast to the previous **'Requirements for initial school teacher training courses at higher education institutions in Wales'** (Welsh Government, 2013), which was simply presented as a set of rules and guidelines. It is timely to revisit the Criteria to make a clearer distinction between context / philosophy and the 'non-negotiables' of ITE in Wales. The Criteria would also benefit from being rewritten to be more straightforward, precise and objective, and as such, better suited to this next phase of development of the partnerships of ITE.

**Consultation questions**

1. **What revisions could be made to the criteria to reflect the ongoing education reforms in Wales?**

We think that it would be beneficial for the Criteria to make reference to several national priorities. However, it is important that students develop an understanding of the underlying concepts pertaining to these in relation to their teaching. Please see our response to question 5 for more detail.

2. **Reflecting on your experience of the new ITE programmes can you outline what partnership has meant to you, how has it developed and how could it be further developed?**

Estyn's Annual Report 2021-2022 the sector summary for ITE provides a summary of findings from our engagement work with the partnerships. In the ITE sector summary we identify several key points about partnership working:

- All partnerships demonstrate a strong commitment to collaboration, and working relationships are maturing.
- All partnerships are developing a culture of research-informed practice.
- Despite the uncertainties of Covid-19, universities and lead schools have demonstrated notable tenacity and agility in working together to support student teachers this year.
- Many partnerships collect a wide range of data about students' progress, but effective systems to identify strengths and areas for improvement strategically to inform improvements are at an early stage of development.
- All partnerships have faced difficulties in placing students in school this year because of Covid-19 restrictions and have had to use a wider network of schools. In addition, partnerships have not undertaken quality assurance procedures and individual mentor development as planned.  As a result, students have had significantly variable experiences.

- All partnerships have found value in meeting and working virtually and this has benefited the development of the partnership.

3. **In relation to specific issues around partnership working, what lessons learnt could be captured under the revised criteria in order to support genuine partnership working going forward?**

In our engagement work with the partnerships and through our pilot activity to develop our inspection arrangements, we have noted a clear commitment to partnership working. Many partnerships, especially those with established ITE programmes, are managing a transitional period from an HEI-led model to one where lead schools are more fully involved in all aspects of leading and managing the partnership.

Challenging aspects of partnership working include:

- Clarifying leadership roles and responsibilities
- Developing lines of accountability through the leadership structures
- Development of self-evaluation and improvement processes. These tend to be led by the HEI, although school and other partners are beginning to develop their role in this work
- Joint self-evaluation and quality assurance of teaching and mentoring and programme design
- Working with the Professional Standards with all partners to assess students' progress fairly and holistically
- Working with the regional consortia to ensure the appropriate selection of schools and secondary subject departments.

4. **What further work to develop partnership working would you expect to see signalled through the criteria?**

It is important that any additions to the Criteria are ultimately of benefit to student teachers (and that the partnerships evaluate all aspects of partnership working to ensure effectiveness and impact).

Additions may include:

- Arrangements for professional learning, drawing on the expertise of all partner organisations
- Stronger links between ITE and induction through closer partnership working of HEIs, schools and regional consortia
- Partnership working to develop students' Welsh language skills (this may include Welsh medium providers, schools and Welsh for Adults provision)

It may also be beneficial to signal partnerships with other sectors in which students may be teaching as part of their programmes. This may be helpful to establish stronger partnership links with a range of providers. Such sectors may include:

- Special schools
- Further Education Institutions
- Non-maintained settings

5. **As the educational reforms in Wales continue and we drive forward policy imperatives and improvements, where would you expect to see a raising of our ambition and expectations reflected through the Criteria?**

To drive forward policy improvements, we suggest that it would be helpful to revisit how the development of the **Curriculum for Wales** (Welsh Government, 2020) is supported through the Criteria, as well as aspects of pupils' **well-being, additional learning needs, equity,** and reference to the **Equality Act 2020**:

**1. Curriculum for Wales (Programme inputs)**

Currently, the Criteria for 'programme inputs' separates the programme of study a Partnership must provide for its student teachers, into **'core studies', 'professional and pedagogical studies'**, **'subject studies'** and **'school experience'**. This means that important, interrelated aspects of learning and teaching are fragmented, as illustrated in the examples below:

- 'the role of assessment in teaching and learning' **(Core studies)** is separated from 'curriculum planning to meet the needs of all learners' **(Professional and pedagogical studies)**, and 'subject pedagogies and pedagogical content knowledge'
- 'pedagogical content knowledge' **(Professional and pedagogies studies)** is separated from 'knowledge of content appropriate to student teachers' chosen age-phase or subject specialism…' **(Subject studies)**

In practice, many partnerships have built their individual modules around these programme inputs, for example by delivering a module on 'Core Studies', with the content specified for core studies in the Criteria. This means that the module structure within a programme does not always support student teachers to make important connections between aspects of curriculum, teaching and assessment, or reflect the design principles of the Curriculum for Wales Framework well enough. In addition, it would be helpful if the Criteria included stronger reference to developing student teachers' knowledge and understanding of pedagogical approaches for children in the early *stages* of their education under 'Programme Inputs'. In this respect, it may be helpful to include a signpost to Welsh Government's very useful, recently published, **'Enabling learning'** guidance, that has been developed to support a pedagogically appropriate curriculum for all learners.

Currently, the Criteria do not reflect the mandatory curriculum elements of **Religion, values and ethics** and **Relationships and Sexuality Education**, the **wider skills** (creativity and innovation, critical thinking and problem-solving, personal effectiveness, planning and organising), the **wider requirements** (Well-being of Future Generations (Wales) Act, 2015) and the **United Nations Conventions on the Rights of the Child**.

It would be helpful if the Criteria could provide a clear steer to Partnerships as to whether there is a requirement, on primary programmes, to develop, student teachers' ability to fulfil the requirements of enabling learners to gain knowledge and skills in **international languages**, as well as in Welsh and English as part of the Languages, Literacy and Communication area of learning and experience.

**2. Curriculum for Wales (Subject studies)**

The Curriculum for Wales supports approaches which draw together different disciplines in curriculum design, with the aim of providing learners with a more coherent learning

experience. For student teachers, as identified in the Criteria, it is important for them to gain knowledge of content appropriate to their 'chosen age-phase or subject specialism, including the subject's key concepts, substance and structure' and 'pedagogical content knowledge, appropriate to age-phase or subject specialism' (Welsh Government, 2018, p.22). This requires student teachers to engage with the structure of knowledge, learning and skill development <u>within</u> distinct subjects or fields of study, as a necessary foundation, for linking learning effectively within and across different disciplines.

'Successful Futures' (Donaldson, 2016) makes clear that areas of learning and experience should not be used as a timetabling device. By using the sub-heading, **'5.7.1 Areas of Learning and Experience'**, this has encouraged Partnerships to arrange their Subject studies module delivery by area of learning and experience in both primary and secondary programmes, just as many schools have grouped their subject departments into areas of learning and experience. In some instances, this means that student teachers are not having sufficient opportunity to get to grips with subject or discipline-specific knowledge and skills well enough, or the pedagogical content knowledge that they need as a foundation to make meaningful connections across learning, a much more sophisticated skill than the Criteria implies. This does not mean advocating 'compartmentalisation in subject teaching' (which the current Criteria guard against on p.22). The Criteria would be strengthened, however, by striking a better balance to support student teachers to develop subject-specific and phase-specific knowledge, skills and understanding, so that by the point of Qualified Teacher Status (QTS), they have the ability to plan and teach a high-quality integrated approach to learning for pupils. As well as supporting student teachers to develop deep knowledge and skills in subject areas or age phase, these changes are likely to contribute to improvements in programme design and coherence, particularly in relation to how Partnerships support the integration of theory and practice.

Referring to the four purposes *after* the areas of learning and experience in the Criteria, does not reflect their prominence in the Curriculum for Wales Framework, or their intention as the starting point and aspiration for schools' curriculum design. This may inadvertently contribute to shortcomings in student teachers' understanding of the holistic nature of the four purposes and the integral skills that underpin them.

Our thematic report, [The teaching of Welsh history including Black, Asian and Minority Ethnic history, identity and culture](), published in October 2021, identifies a series of recommendations for schools, local authorities, regional consortia and Welsh Government to support **antiracism**, **diversity** and the teaching of local, **Welsh and Black, Asian and Minority Ethnic** history and culture. We consider this an important aspect of professional learning for all student teachers.

**4. Well-being, additional learning needs, equity and equality**

We recommend that section **5.8 Well-being** of the Criteria includes a much stronger focus on safeguarding children and young people, as part of student teachers' 'ability to contribute to the wellbeing of the pupils in their care' (Welsh Government, 2018, p.23). The 'Keeping learners safe' guidance (Welsh Government, 2021, p.3) says:

> The guidance also sets out effective practice for wider education settings and related agencies, particularly those inspected by Estyn. It is recommended as relevant for youth services, work-based learning providers, proprietors of EOTAS provision, **initial teacher education (ITE) partnership leads**, safeguarding children boards, higher education institutions, Careers Wales and funded non-maintained early years settings.

We propose that the Criteria should refer to this important guidance and the responsibilities of ITE Partnerships, summarised on p.20 of 'Keeping learners safe', under **'The Partnership's Leadership and Management'** section of the Criteria.

We suggest that references to **additional learning needs (ALN)** require updating and strengthening throughout the Criteria. Given the scale of ALN reform in Wales, one general bullet point under 'Core Studies' about curriculum planning 'to meet the needs of *all* learners' (Welsh Government, 2018, p.22) is not sufficient.

Section A of the accreditation guidance refers briefly to poverty in the Welsh context as part of student teachers' learning experiences and provides a link to the Welsh Government (2015) 'Child Poverty Strategy for Wales', but this focus is not reflected in the Criteria itself. We suggest that a whole-system approach to securing **equity and excellence** for all children and young people in Wales means that this should be a prominent aspect of all ITE programmes.

In section **5.10 The Equality Act 2010**, the Criteria identifies that Partnerships 'will need to ensure that selection procedures and policies do not discriminate unfairly against applicants with disabilities or special educational needs' (Welsh Government, 2018, p.21). However, currently, it does not reflect all protected characteristics.

6. **Are there any specific amendments we could make to the criteria to further clarify and support development?**

| Section | Section Title | Comments / Amendments |
|---|---|---|
| A: Vision | The policy context | Section A on Vision has been separated from the 'Criteria for accreditation' (Section B). This suggests that the content included under 'Vision' is separate from the accreditation criteria, and therefore *not* judged as part of the accreditation process. However, within the 'Vision' section, the document sets out what providers *are* required to do, for example, to: <br><br>• 'ensure higher education institutions (HEIs) and schools work closely as partners to design and facilitate ITE', <br>• 'attract high-calibre entrants to the teaching profession' <br>• 'develop student teachers' appreciation of cultural diversity in society and in the classroom' <br>• 'ensure high standards in student teachers' own literacy and numeracy and digital competence…' etc. <br><br>(The policy context, pp.7-8) <br><br>The bullet pointed list of requirements on pp.7-8 could be condensed. It contains detail |

| | | about student teachers' **digital competence** that is subsequently repeated in other sections. |
| --- | --- | --- |
| | | We suggest that the content of Section A could be rationalised by separating the policy context of the vision for ITE in Wales *from* the vision a Partnership needs to establish for its programme(s). The vision the Partnership needs to establish fits logically under Programme structures and processes, where this is also referenced. |
| Section A: Vision | Student teachers' learning experiences | This section of the document, which is intended to explain why programmes need to be 'both rigorously practical and intellectually challenging', would benefit from some refocusing. For instance, it provides considerable detail about some aspects of student teachers' learning experiences (i.e. knowledge about contemporary Welsh society) but too little reference to important areas, such as the development of student teachers' planning, assessment and evaluation skills. |
| | | If this section is to remain, it would be helpful for the reader to explain clearly what is meant by *'full professionals'*, *'defend their own 'theories' of professional practice'* and *'become true professionals in their own right'*. We would suggest using more modern phrasing and terminology, for example instead of 'one's teaching'. There is reference to the need for student teachers 'to understand something about the structure of knowledge in the subjects they are teaching…' (p.9) but currently, the guidance does not refer to subject-specific or cross-curricular **skills**. This is particularly important in view of content of the Curriculum for Wales. |
| B – Criteria for Accreditation | 4.Programme structures and processes | The document numbering system can be confusing for the reader because the Criteria for accreditation begin with '4. Programme structures and processes'. |
| | 4.1 – The partnership's | The criteria identify the need for lead partnership schools to 'play a full part in |

| | leadership and management | each programme's quality assurance and self-evaluation' (p.12) and require them to 'show how self-evaluation will contribute to the continuous improvement of the provision' (p.13). However, the footnote (below) accompanying this statement might drive unhelpful behaviours by inferring that self-evaluation is a one-off event. It might be helpful to provide examples that convey a broader range of information a Partnership (rather than an HEI) may gather, as part of its self-evaluation, to identify its strengths and areas for development: |
|---|---|---|
| | | > 'Self-evaluation should include, routinely and at least annually, interrogation of external examiners' reports, the development and use of performance data and research, we well as other moderation and benchmarking.' (p.13) |
| | | By separating 'self-evaluation' from the other bullet points on the use of data and gathering the views of student teachers and schools, this might not support Partnerships to develop an informed view of what effective self-evaluation is and the importance of triangulating evidence. |
| | 4.2 criteria for the inclusion of schools in the partnership | Currently, the criteria states that 'the HEI should consider only effective schools that are recognised within their regions for high-quality provision.' (p.14). This should be a consideration for 'the Partnership', and not solely the HEI. It would also be helpful to acknowledge that Partnerships may work with local authorities and not just regional consortia. |
| | | Given the removal of summative gradings for inspection areas on school inspections and the current position with national categorisation, it would be timely to reconsider what is said in the document about the inclusion of schools in the Partnership. |

| | | |
|---|---|---|
| | 4.3 Roles and responsibilities in all partner schools | In this section, in particular, it would be helpful to review whether each statement is a requirement, a recommendation or a suggestion, as equity is an important consideration for student teachers' experiences in partner schools, for example: 'In all school experience contexts, as well as observing a wide range of teaching, student teachers should plan and teach lessons or a series of lessons and receive constructive feedback'). The section on 'small schools' could be included as a shortened footnote. |
| | 5 Programme Inputs | It would be helpful not to conflate 'course elements' with modes of learning. The examples provided, such as 'face-to-face' and 'blended learning', are modes of learning (p.20). Information about student teachers needing to experience a minimum of two contrasting school settings is included elsewhere, so this could be removed from this section. |
| | 5.9 School experience | This section repeats information included elsewhere about why this part of the programme is important. |
| | 5.11 Assessment of student teachers & 5.11.1 Career entry profile | It would be helpful to refer to the Professional Learning Passport in these sections. |
| | 5.11.2 Improvement through assessment | There are important messages in this section about using the assessment of student teachers' standards to support programme evaluation and improvement. It would be helpful if the subheading reflected this more clearly, particularly as the previous two sections are about the assessment of student teachers and their ongoing improvement. It might be useful to make a link between this section and the section of the document that refers to self-evaluation. |

**7. Are there any further reflections or comments you would like to make regarding strengthening our shared understanding of teacher education in Wales via the Criteria?**

General observations:

As well as the obvious updating required to reflect current educational policy in Wales, it would benefit from some reorganisation, stripping back and clearer delineation between:
- **background information and context**
- **theory about effective ITE provision**, and
- the **requirements** for programmes in terms of the accreditation criteria.

It would be useful to review the use of 'will', 'need to', 'must' and 'should' within the accreditation criteria to ensure there is clarity about the degree to which a criterion is a requirement of accreditation (and a legal requirement), guidance, a recommendation or a suggestion (e.g. 'may like to').

Also, it would be helpful to review terminology for consistency and spelling. For instance, 'programme', 'program' and 'course' (e.g. '5.2 Course aims') are used in the document. Student teachers are referred to as 'trainees'; learners are referred to as 'pupils' and 'students', and staff are also described as 'personnel'. 'Digital competence' and 'digital competency' are both used. Some terminology and expression is outdated (for example, 'CPD', 'special and additional educational needs').

The **Executive Summary** sets out the process for the development of the Accreditation Criteria and the rationale behind the new arrangements. Also, it provides quite a lengthy overview of the programme structures and processes, with brief details about the required programme inputs and programme outcomes. Therefore, the overview of the Criteria for accreditation appears a little unbalanced.

**1. The policy context**
Section A on Vision has been separated from the 'Criteria for accreditation' (Section B). This implies that the content included under 'Vision' is separate from the accreditation Criteria, and therefore *not* judged as part of the accreditation process. However, within the 'Vision' section, the document sets out what providers *are* required to do, for example to:
- 'ensure higher education institutions (HEIs) and schools work closely as partners to design and facilitate ITE',
- 'attract high-calibre entrants to the teaching profession'
- 'develop student teachers' appreciation of cultural diversity in society and in the classroom'
- 'ensure high standards in student teachers' own literacy and numeracy and digital competence…' etc. (The policy context, pp.7-8)

The bullet pointed list of requirements on pp.7-8 contains too much unnecessary detail about student teachers' **digital competence** and includes content that is then repeated in other sections.
It might make more sense to rationalise this content by separating the policy context of the vision for ITE in Wales *from* the vision a Partnership needs to establish for its programme(s). The vision the Partnership needs to establish fits logically under Programme structures and processes, where this is also referenced.

**2. Student teachers' learning experiences**

This section of the document, which is intended to explain why programmes need to be 'both rigorously practical and intellectually challenging', provides too much detail about some aspects of student teachers' learning experiences (i.e. knowledge about contemporary Welsh society) and too little reference to important areas, such as the development of student teachers' planning, assessment and evaluation skills.

If this section is to remain, it would benefit from additional clarity, for instance to explain what is meant by 'full professionals', 'defend their own 'theories' of professional practice' and 'become true professionals in their own right'. There is reference to the need for student teachers 'to understand something about the structure of knowledge in the subjects they are teaching…' (p.9) but there is no reference to subject-specific or cross-curricular **skills** (This is particularly important in view of the deficits in pupils' skills as a result of the pandemic).

For clarity, the document should refer directly to the 'standards for QTS', rather than 'They need to be prepared to achieve the relevant professional standards for registration with the EWC in Wales' (p.19).

Within the previous 2013 Requirements document, there were a few **'Questions for providers to consider'** under each section. This could be a helpful addition to this document and might help to support the aspects of the accreditation Criteria that Partnerships have struggled with in their submissions so far.

8. **Are you providing this feedback as an individual or for your organisation?**

   ☐ **Individual**
   ✓ **Organisation**

   **If you are responding as an individual, please advise how you would describe yourself**

*For example: Student Teacher, NQT, Mentor, Classroom teacher, Parent, Governor etc.*

9. **Organisation Name**

**Estyn**

10. **Organisation 'Type'**

   ☐ **Primary School**
   ☐ **Secondary School**
   ☐ **Through School**
   ☐ **Sixth Form / FE College**
   ☐ **University – ITE Partnership**
   ✓ **'Middle' Tier Organisation (e.g. Estyn)**
   ☐ **Professional Body / Education Workforce Union**
   ☐ **Other _____**

11. **Contact email (we may contact you in order to clarify your answers if required)**

| | |
|---|---|
| ChiefInspector@estyn.gov.uk | |