

Strengthening Qualified Teacher Status and improving career progression for teachers

Response of the Association of School and College Leaders

A Introduction

- 1 The Association of School and College Leaders (ASCL) represents nearly 19,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
- 2 Our remarks are organised in sections as follows:
 - A Introduction**
 - B Strengthening QTS: proposals for post-ITT teachers**
 - C Post-QTS teacher career progression and leadership**
 - D Responses to the specific questions**
 - E Conclusion**
- 3 ASCL very much welcomes this consultation. Like the department ASCL recognises that the quality of teaching is the biggest in-school factor affecting the outcomes of children and young people. Our members lead the nation's schools and colleges and nothing can support their work better than ensuring we recruit, develop and retain a high quality teacher workforce.
- 4 The consultation leads with a compelling rationale for change. Few would dispute the value of raising the status of the teaching profession and enabling all teachers to have high quality continued professional development and support. However it is indisputable that none of this can be achieved without significant additional funding. Schools and colleges have faced significant cost pressures over several years coinciding with a period of 'flat cash', the removal of specific grants or at best minimal cash increases. In the current school and college financial situation changes that may come from the outcomes of this consultation must be fully funded.
- 5 ASCL agrees that there should be clarity about how teachers can progress in their careers, recognising that not all people progress into leadership roles. There should, we believe, be a strong offer of professional development throughout a teacher's career.
- 6 We note that the department wants to prioritise the development of professionals working in more challenging areas and recognises that this will, in part, be an attempt to make working in those areas more attractive and professionally rewarding. We would however point out that the major issue impacting on recruitment of teachers into these areas is the national shortage of teachers. We would therefore urge the

department to work with the profession in developing an overarching strategy for the recruitment and retention of teachers.

- 7 The association agrees that setting out a clear offer of teacher development and career progression is an important part of improving the attractiveness of teaching as a profession and that this should have a positive impact on recruitment and retention.
- 8 We very much support the view expressed in the consultation that 'cultural change cannot be dictated by government, and a career progression offer will only be effective when these changes are led by the profession'. We recognise that Government has a role to facilitate and support these changes, however for these changes to be sustainable they must be owned by the profession. The association notes the recognition in the consultation that the development programmes in other professions are led by professional bodies rather than government and believes that this should also be the case in education. We would therefore urge the department to consider how this can be achieved by engaging with the profession and its representative bodies including ASCL, the Chartered College of Teaching and the Foundation for Leadership in Education.

B Strengthening QTS: proposals for post-ITT teachers

- 9 ASCL broadly supports the proposals in this section. We see great value in having a core, structured early career content framework for NQTs building on the knowledge, skills and attributes that NQTs have developed through their ITT programme.
- 10 We agree that there should be a rigorous and meaningful end of ITT certification and our members recognise that time and experience is needed to develop the core knowledge and skills essential to great teaching, so we support the proposal that the new QTS should be awarded after two years of classroom practice.
- 11 We would however only support the proposal in 10 above on the understanding that teachers who complete ITT will have the same rights and protections as current NQTs and that salaries post-ITT will still be on the qualified teacher pay scale, and teachers in their second year will have the same entitlements to pay progression as they currently have.
- 12 We recognise that there is some variation in the experiences of NQTs in terms of the CPD and support they receive in their early career and welcome moves to ensure that all teachers experience a structured period of support at the start of their careers.
- 13 We support the extension of the induction period and favour the move to a two year induction period in preference to a flexible timeframe model.
- 14 The association does not like use of any of the terms suggested, provisional – QTS(P), Certificate of Completion of ITT or Associate Teacher Status. Our preference is for Initial Qualified Teacher Status, IQTS followed by (full) QTS with no need to include an 'F' to indicate full.
- 15 ASCL fully supports the proposals to have a structured early career content framework, adaptable to the needs of individual teachers. We believe that there should be a core to this framework together with some optional areas to meet specific needs. New teachers will also need to be supported to build their personal effectiveness including how to manage their workload.

- 16 The association agrees that developing such a framework is best led by the profession. A major responsibility must continue to lie with individual schools as they carry a responsibility for ensuring that all their NQTs develop their practice against each of the core areas.
- 17 If the department took the route of commissioning a small number of CPD providers to develop high-quality content against the core areas this would not follow the principle indicated in other places in the consultation of these changes being profession led. It would be much better to examine ways in which responsibility for this can be moved to the profession. An interim position would be to adopt the proposal in paragraph 42 whereby providers apply to be an approved provider and develop CPD content for all of the core areas, similar to the model used in National Professional Qualifications (NPQs).
- 18 It is important that all of the CPD offered to early career teachers is of the highest possible quality so there is a need to have an effective quality assurance process for this core programme.
- 19 ASCL would fully support moves to link the core CPD programme, and optional work if possible, to a Masters qualifications, ideally through some form of Master's credit arrangement.
- 20 ASCL recognises the value of the 10% reduction in the teaching timetable to which NQTs are currently entitled. We can see the value of giving some supplementary non-contact time in a teachers' second year and would support this provided it can be fully resourced. There is no way in the current financial situation that schools, could afford to provide additional release time for second year teachers, nor to provide mentoring support without supplementary funding.
- 21 We recognise the difficulties that an excessive workload can bring to a NQT. Schools and colleges will take steps to keep the workload of their NQTs under control and to skill them up in time management and prioritisation. However the ability of a school to reduce the responsibilities of new teachers will significantly depend on the context of the school. It should also be recognised that an NQT will at some stage need to take on the full responsibilities of a teacher so needs to, at the very least, be introduced to these responsibilities early in their career.
- 22 Having a single set of standards that apply to a teacher at every stage of their career is quite clearly an issue and something that ASCL raised at the time of their introduction. In most contexts standards are considered to be 'absolute' and in their application a person either meets or does not meet the required standard. It has been necessary to consider the teachers' standards as 'relative' with various organisations developing their own guidance on the interpretation of these standards at different stages of a teachers' career from ITT through to senior post-holders. This is not a wholly suitable system and as clarity is required the development of a national understanding of what meeting these standards mean at various career stages would be helpful and ensure a more consistent application of these standards. At some stage in the future having a review to bring the guidance and the teachers' standards together into a set of standards for various stages of a teacher's career would be helpful.
- 23 ASCL agrees that there needs to be a strong system of independent verification of the awarding of QTS. We note the current variation in the offer to schools and would support the introduction of a quality assurance process for the appropriate bodies. We would therefore support the introduction of a quality assurance mechanism that could include an accreditation process, whereby appropriate bodies have to apply to take on

the role, demonstrating that they understand the requirements. ASCL would also support facilitating a national network for appropriate bodies to provide support and a forum for working through issues that arise.

- 24 There are major implications in terms of funding these proposals as schools will not be able to implement any of these proposals without significant additional funding. Further detail is given in our response to question 15.

C Post-QTS teacher career progression and leadership

- 25 ASCL fully agrees with the previous Secretary of State in supporting the growing culture of evidence-based professional development in education. We also agree that there is a need to have 'clearer career development pathways' for those seeking to follow a career in education.
- 26 We agree that there is a need to explore alternative pathways focused on classroom practice and building specialist subject expertise becoming more widespread, with clearer routes for progression for teachers who wish to stay in the classroom as a subject expert.
- 27 The changes in the school system particularly the ways in which schools work together, eg in MATs, TSAs, SCITTs and federations, have opened up a range of new career development opportunities and a number of examples of 'non-traditional' career routes have already appeared in the system.
- 28 Whilst we do not want to see an explosion of formal qualifications we can see the value of broadening the range of National Professional Qualifications (NPQs) or by adding subject specific elements to the existing NPQML. We can see a future for NPQs in areas such as assessment, mentoring, coaching, behavioural management and curriculum design.
- 29 If the aim is to truly to have a school led system with the profession at its fore and taking responsibility for the professional development of teachers and its accreditation, the roles of ASCL, the Chartered College of Teaching and the Foundation for Leadership in Education need to be explored.
- 30 ASCL is supportive of the role of the Chartered College of Teaching and their work in piloting Chartered Teacher Status.
- 31 Consideration of a 'professional qualifications framework' also highlights some issues around the SLE/NLE roles, their accreditation and deployment that we believe would benefit from a review.
- 32 ASCL believe that there is already a recognition that one of the roles of a school leader is to talent spot and support teachers in their career progression. There are many examples of this working well in individual schools and across groups of schools eg MATs, TSAs.
- 33 The association recognises that although CPD is strong in many areas this is not the case in every school or trust. We are also aware that in the current difficult financial circumstances impacting on schools CPD can be one of the areas that is facing potential cuts.
- 34 Whilst we are fully supportive of ensuring that all teachers get relevant CPD we do not favour a system that sets a minimum number of hours of CPD for teachers at any

stage of their career. Indications from other professions where this has been used eg health service, legal, is that it leads to a 'tick the box' approach rather than a willing, active and effective engagement in CPD. It is important that these proposed changes engage a 'hearts and minds' approach from the teaching profession as people understand that these changes are for the benefit of everyone in the education service, particularly pupils and teachers.

- 35 ASCL would support the development of a national CPD framework for early career teachers (post QTS), similar to that proposed for NQTs.
- 36 We are of the view that relevant CPD should be an entitlement for all teachers. However whilst we understand the need to get CPD funding to where it is most needed, we are, in general, not in favour of ring fenced funding as we believe that the school leadership is best placed to decide the priorities for the school.
- 37 ASCL is fully supportive of the proposal to extend the mentoring offer for teachers beyond the first year of their career provided it is fully funded. We agree that there should be a mentoring component in any new specialist qualification that is developed.
- 38 We see the value in the 'train the trainer' style of CPD but would point out that this requires high quality resources, careful selection of the 'trainer' and a thorough training programme if it is to be successful.
- 39 We very much support the piloting of work-related sabbaticals. It would be good to have evidence of how these have been successfully used in other countries before finalising a pilot scheme.

D With reference to your specific questions

Question 1 Do you think that QTS should be awarded after a period of sustained professional practice rather than the end of ITT?

- 40 ASCL agrees that 'full' QTS should be awarded after a period of sustained professional practice.

Question 2 Do you agree that a core early career content framework and CPD offer for new teachers should be fundamental to a strengthened QTS?

- 41 The association agrees that a core early career content framework and CPD offer for new teachers will be an essential element of strengthening QTS.

Question 3 What core competencies, knowledge areas or particular skills do you think should be developed in a structured way during the induction period?

- 42 We consider that there are a range of core areas that should be included during the induction period. These include:
- i. Deepening an understanding of subject pedagogy
 - ii. Developments in neuroscience and understanding how children learn
 - iii. Developing knowledge and skills of assessment
 - iv. Developing their subject knowledge and improving skills in planning the subject curriculum
 - v. Understanding how their subject fits into the overall curriculum
 - vi. Deepening understanding of children's behaviours and further development of a range of behavioural management techniques and approaches
 - vii. Further development of skills working with those pupils with SEND

- viii. Further understanding of pastoral and safeguarding issues
- ix. Develop an understanding of wider educational issues (in preparation for possible leadership and other career progression roles)

We agree with the proposal in paragraph 39 that the framework should include a number of optional areas based on personal development needs, school context, and career aspirations. Whilst there will need to be a certain consistency to the 'offer' there should also be sufficient flexibility to meet individual needs and career progression aspirations and opportunities.

- 43 In this area for development, as with other proposals in this consultation, ASCL agrees that the early career programme needs to be developed by the profession. Whilst we believe that ITT providers have a part to play it is important that practitioners should take the lead in developing such CPD programmes.

Question 4 To achieve these objectives, do you think we should extend the induction period?

- 44 ASCL supports the move to award QTS, following an agreed approval process, after two years of teaching.

Question 5 We have used the names QTS(P) and QTS throughout this document. Do you think that these terms are appropriate?

- 45 We understand the regulatory requirement however we do not support the use of the term provisional (P). We would favour the use of the term 'initial' as in Initial Qualified Teacher Status (IQTS) and QTS, the latter implying 'fully' qualified teacher status but without a need to include the 'F'.

Question 6 Which of these proposals do you think would help improve the quality and quantity of mentoring for all new teachers?

- 46 ASCL considers that there is merit in all of the proposals given in paragraph 47. A review of mentoring standards would be helpful as would the strengthening of the induction guidance related to mentoring and the development of high-quality training for mentors. The point in paragraph 47 about the potential conflict between the monitoring and supporting roles of the induction tutor is well made and we can see the benefits of adding an additional mentoring role to the statutory induction guidance. We are aware that this is an approach that a number of schools already use.
- 47 There is much to commend in strengthening mentoring of NQTs but this will require additional resources in terms of freeing up more time for the mentors as well as ensuring they are appropriately trained. Again this is not something that schools can achieve from within their existing budgets so additional funding will be required to implement this proposal.

Question 7 How else can we improve the quality and quantity of mentoring for all new teachers?

- 48 ASCL would support the development of a professional qualification for mentors, this would help develop the skill base of mentors and hopefully increase the pool of available mentors. It is also important to ensure that mentors have sufficient time allocated for that role. Quality mentoring requires quality time between the mentor and the mentee so it is important that these meetings have sufficient time allocated, are not

rushed or programmed in at awkward times of the day. This again is a development that, to be successfully introduced, would require additional funding.

- 49 Evidence of helpful mentoring practices in our schools, eg paired observations of other teachers' lessons, should be collated and shared.

Question 8 How should we ensure that new teachers get sufficient time to focus on their professional development?

- 50 There are a number of actions that schools currently do to help NQTs in their first year have sufficient time to focus on their professional development including careful planning of their timetabled activities, monitoring their workload and ensuring they have the required allocation of planning, preparation and assessment (PPA) time. Having a statutory right to supplementary non-contact time, currently the 10% reduction on teaching load, is clearly a way of ensuring that NQTs get additional time to meet the demands of starting out on their teaching career.
- 51 It is also important that NQTs develop good skills in time management and prioritising. Ideally these will have been a focus on ITT programmes and schools and colleges usually build these into their induction programmes.
- 52 Schools frequently work together on programmes to support NQTs either through formal partnerships such as MATs, Teaching School Alliances (TSAs) or informal arrangements across groups of schools. Setting up such programmes is helpful as the structure promotes regular arrangements for professional development as well as promoting peer support.

Question 9 Do you agree that the QTS assessment should be conducted internally and be independently verified by an appropriate body?

- 53 Schools will know the work of their NQTs best so ASCL agrees that the headteacher should continue to be responsible for the assessment of their NQTs and that the assessment should be externally verified.

Question 10 How do you think we should strengthen the independent verification of QTS accreditation?

- 54 Independent verification is important to ensure validity and a consistent application of the criteria for awarding full QTS however it will be essential that any changes do not lead to an overly bureaucratic system. There should not be a requirement for schools, or NQTs themselves, to have to collect evidence for the sake of it. Evidence should come from the direct day to day work of the NQT.
- 55 We would strongly indicate that we see no role for Ofsted in this process.
- 56 As indicated in paragraph 22 above we believe that the provision of a single set of standards for teachers is causing difficulties and at some stage a review of the standards should take place, including whether a single set is appropriate.

Question 11 What role do you think ITT providers could play in the assessment and accreditation of QTS?

- 57 The accreditation of full QTS should be carried out by the school and moderated against the national standards by an appropriate body.

- 58 ASCL sees ITT providers as approving the initial qualification at the end of the ITT programme but does not see them having a role in the assessment or accreditation of full QTS unless they apply to become an appropriate body and are approved and endorsed as such.
- 59 There would also be a number of practical issues about ITT providers being engaged in the full QTS accreditation eg NQTs may have moved areas away from their ITT provider, ITT providers may know some NQTs better than others if they trained them, ITT providers may be influenced by their existing knowledge of NQTs.

Question 12 Do you think we should maintain the limitation on how long a teacher can teach on a supply basis without completing QTS?

- 60 ASCL believes that there should be a limit on how long a teacher can teach on a supply basis without completing QTS and we feel that the five year period is appropriate. We would however suggest that rather than requiring a person to have to complete a further ITT programme should they wish to return to teaching consideration should be given to developing a shorter refresher/retraining programme.

Question 13 Considering all of the above, what impact would this model of a strengthened QTS have on post-ITT teachers in terms of teaching practice, retention, and morale?

- 61 The strengthening of QTS should not be seen in isolation but in the context of developing a career structure for teachers. It is an important strand in changing the culture of teaching as a career. There will be a need to 'tell the story' about how this will raise the status of the profession and be a key part of the profession taking control of its own professional development.
- 62 There is a slight risk that the first groups to go through a two year QTS process will feel less trusted. However we believe that the majority of NQTs will see this change positively and feel more valued by having a more structured start to their career with a professional development programme preparing them for future career opportunities as well as improving their immediate performance in the classroom. It is our view that NQTs will value any additional release time in their second year of teaching to reflect on and hone their skills.
- 63 We believe that having a well-developed mentoring programme for all NQTs will be well received by new teachers.

Question 14 What impact would this model of a strengthened QTS have on the wider school system?

- 64 ASCL considers that these changes should have a very beneficial impact on the wider school system provided that the changes are appropriately resourced. It is clear to us that significant additional funding will be required to implement these proposals but if appropriately resourced the impact should be significant.
- 65 Ensuring that all NQTs have high quality mentoring support and professional development, if combined with work on developing a career structure for teachers, should have a major and immediate impact on recruitment.
- 66 Training experienced teachers as mentors, and then working with NQTs, should be motivational to them as they bring the next generation of teachers through and could assist in medium and long term retention. It opens up a rewarding but different career

route for teachers who want to remain 'within the classroom' and not move into a senior leadership role.

- 67 The focus on early career professional development will give all new teachers a very positive start to their teaching career and should impact on retention. It will however create high expectations of the level of professional development and support that they will experience later in their career. It will be important that these expectations are met so there will need to be an ongoing programme of high-quality professional development all the way through a teacher's career.

Question 15 Are there any other implications that we should consider, and what are your suggestions for addressing them?

- 68 The major implication that we have identified is the need for significant additional funding. As we have said throughout this response there is no way that schools have the resources to implement any of these proposals without additional funding. There are several cost implications including:
- i. Funding additional release time for NQTs in their second year
 - ii. Funding the development and implementation of the improved professional development offer to NQTs
 - iii. Funding for the development of online learning materials
 - iv. Development of training programme and training costs for mentors, including release time to complete training
 - v. Release time for mentors to carry out mentoring
 - vi. Cost of providing quality assurance to the professional development offered to NQTs
 - vii. Cost of improving the quality assurance of the accreditation process
- 69 It will be important to ensure that the proposed changes do not in any way increase bureaucracy either for schools or for the NQT.
- 70 The system that is developed should be consistent and work across all types of school structures and phases. Teachers working in all sectors must be included in the new arrangements and there should be arrangements for ensuring that part-time teachers are not disadvantaged.
- 71 Any changes introduced must ensure that general transferability and portability issues are addressed, for example how to monitor the two year QTS should teachers change schools after their first year, including significant changes in location.
- 72 Provision also needs to be made for those that start their teaching career in a part-time capacity including determining how long the QTS period will be for them. Provision will also need to be included for those that take maternity or paternity leave during the qualifying period.
- 73 The changes also needs to take into account transferability as teachers from this country will use their QTS approval to enable them to teach abroad. There are also likely to be issues that need to be resolved for teachers moving between England and Wales should Wales not adopt a similar approach.
- 74 Consideration will need to be given to the implications for teachers coming to teach in England from abroad and what adjustments may be required to current arrangements.

Question 16 Do you think that there is a market for specialist NPQs – or similar – for teachers who aspire to other forms of leadership within the school system?

- 75 ASCL believes that there is a case for a number of specialist NPQs and that provided funding was made available there would be a good take up of specialist NPQs.

Question 17 What specialisms should be prioritised?

- 76 ASCL considers that there is a good case for specialist NPQs including:
- i. Assessment
 - ii. Mentoring
 - iii. Coaching
 - iv. Research
 - v. Curriculum design
 - vi. Behavioural management – although we are concerned here that as managing behaviour is a responsibility of all teachers we would want to avoid any idea that a person with this qualification become the ‘responsible for discipline’ person in the school
- 77 We recognise the work of the Chartered College of Teaching in developing a new Chartered Teacher Status and would like to engage in further discussions as to how this will fit in with existing and any newly proposed NPQs in the context of a career long professional development programme for teachers.

Question 18 Do you think there is a market for non-leadership NPQs – or similar – aimed at further developing subject expertise? How should they differ between primary and secondary phases?

- 78 We consider that there is scope for adding a subject specific element to the NPQML qualification. This could be completed as an endorsement to the NPQML. We would encourage the department to discuss, with the subject associations, the subject specific content related to these developments. There may be a case for some of this work being phase specific particularly related to subject content and pedagogy, however we recognise that there are now many all-through schools or MATs that cover all phases so some of this may need to be optional with the endorsement to the NPQML reflecting any specificity. There is already a SEND qualification and there may be scope for an NPQ specifically for Alternative Provision.

Question 19 What additional support should be offered for teachers who work in more challenging schools to undertake further professional qualifications?

- 79 ASCL does not consider that there will necessarily be a need for additional qualifications for those who work in more challenging schools. Any national qualifications framework proposed should be available to all teachers. We do however recognise that teachers working in more challenging schools often will need more time, practical support and resources to be successful.

Question 20 Do you agree that a CPD badging scheme is something that should be developed? What organisations might be best placed to deliver this service?

- 80 We recognise that there may well be issues regarding the quality of some of the existing CPD provision, however schools will endeavour to do a quality check on any provider before they use them. We therefore do not support a CPD badging scheme for general CPD provision however we do support the current process of accrediting providers of the NPQs and would suggest a similar process for any additional NPQs.

An increasing amount of the CPD being delivered is through TSAs which have their own quality assurance systems in place.

- 81 ASCL is supportive of the Institute of Educational Advisers (IoEA) which has been set up to accredit those who are working as advisers/consultants with schools and colleges. We believe that the accreditation of such advisers will be helpful to schools looking for specific support.

Question 21 How should government incentivise effective professional development for teachers, particularly in the areas and schools where it is most needed?

- 82 We strongly believe that teachers are keen to improve their performance and will willingly engage in high quality CPD. The major factors holding them back are time and money. Teachers are often reluctant to go out to training and leave their groups to supply teachers unless they are confident the supply teacher can deliver the same quality of lesson. Teachers working in schools in challenging circumstances need to have programmed time for CPD that does not impact on their teaching commitment; indeed ideally all teachers should have this. There is a cost and without additional funding it will not be possible for schools to implement any of these proposals.

Question 22 How can government best support the development of a genuine culture of mentoring in schools?

- 83 The role of government here is one of facilitating this change. Inevitably this means providing the resources. To develop a genuine mentoring culture in schools will require:
- i. Funded for the training and accreditation for mentors
 - ii. Funding to give the mentors sufficient release time to do the mentoring
 - iii. Funding to ensure the mentees have time to properly engage with the process

- 84 The government should actively promote mentoring through their messaging.

- 85 Schools themselves will need to fully engage with the process to deliver on this.

Question 23 Do you think that a fund to pilot sabbaticals would be a positive step for the profession?

- 86 Yes, we fully support setting up a pilot for sabbaticals. We believe that it would be a very positive step to enable a number of teachers to engage in work-related study. In our view it would promote teaching as a research based profession and help build up the evidence base for future developments. There are of course financial implications with a need to meet the salaries of those on sabbatical and there will need to be clear criteria for the selection for sabbaticals from those applying.

Question 24 What would the impact be for teachers and schools of enabling more teachers to take sabbaticals, providing they are related to their teaching practice?

- 87 We consider that this would be very motivational to those engaged in a sabbatical and, provided they were bringing back helpful information that can be disseminated to the rest of the staff, it should have a positive impact on their school.

E Conclusion

- 88 ASCL considers this consultation a valuable step in developing a career structure for teachers and is supportive of the proposals.
- 89 For these proposals to be successful they will need to be fully funded.
- 90 I hope that this is of value to your consultation, ASCL is willing to be further consulted and to assist in any way that it can.

Malcolm Trobe CBE
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