

Government consultation on Appropriate Body reform and induction assessment

Response of the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) represents over 21,500 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 children and young people across primary, secondary, post-16 and specialist education. 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. ASCL welcomes the opportunity to contribute to this consultation.

B. Key points

3. Many ASCL members believe that the move away from LA involvement in teacher induction is ideologically motivated rather than a genuine attempt to improve the system and may make quality assurance of this vital part of teacher recruitment and retention less transparent.
4. Many Teaching School Hubs (TSH) are already struggling to provide the range of services in their portfolio, even without adding the Appropriate Body (AB) role, and the geographical spread of schools for each TSH means that relationships are sometimes difficult to develop.
5. ASCL is particularly concerned about the potential for conflict of interest and lack of transparency between the different aspects of the TSH role, despite the best intentions of the TSHs themselves.
6. The DfE should carry out a workload impact assessment in order to understand the implications of transferring the role from the current 207 local ABs to only 87 TSHs.
7. There is a continuing need for quality assurance of AB support and of judgements of Early Career Teachers (ECTs) against the Teaching Standards, in order to ensure consistency across the country and between different schools and Trusts. Government proposals for redesignation of TSHs should include a measure of quality assurance.
8. As TSHs will be redesignated in August 2024, it makes more sense for the transfer of AB responsibilities from LAs to be finalised at that point rather than be completed for September 2023.

C. Answers to specific questions

Question 1: What barriers do ABs face in ensuring that ECTs are provided with their statutory entitlements and how could these be overcome?

9. Changes to the induction process, with the introduction of the Early Career Framework (ECF) and the various ways in which schools can choose to deliver, have meant that ABs have had to spend time understanding and developing new arrangements for the Framework. This includes the time spent setting up procedures around the required fidelity checks for the Core Induction Programme and the School Based Induction Programme. This should become easier over time, but TSHs who have not yet become ABs will need support to develop these programmes.
10. ABs have also developed deep knowledge of statutory requirements and built close working relationships with local union representatives. They have a strong role in preempting problems by targeting schools with multiple ECTs and mentors and ensuring the rights of the ECT are understood and met. Effective ABs have prioritised the induction of Induction Tutors and established relationships with LA teams such as Professional Partners, which allow them to stay alert to additional challenges schools may be facing.
11. While most TSHs have registered to become ABs, this is only one part of the large range of activities for which they are responsible. The AB role is a complex area of work and will require specialist input which may not yet be available in all TSHs. It will also require sufficient staffing to support a large number of ECTs administratively, educationally and legally.
12. LAs tell us that there are significant costs (financially and in terms of time) to supporting ECTs who are in danger of failing, and particularly those who do fail and appeal against the decisions. There is a danger that there will be too little support for school leaders to help ECTs to improve, particularly when fewer ABs are working with double the numbers of ECTs, and that this could lead to ECTs being moved on prematurely or lost to the profession entirely.
13. It has been difficult to quality assure AB work across the range of LAs, meaning that quality has been variable across the country. Early suggestions around accreditation for ABs were deemed unworkable. But this leads to a proposal where TSHs will be held accountable for key performance indicators via their contracts with the DfE. While this should allow for some quality assurance via the redesignation process every three years, the AB role will be only one part of the decision, and this could allow a whole cohort of ECTs to undergo a substandard process. ASCL would like to see greater transparency in this process, and assurances that the quality of the AB role will play a large part in future redesignation decisions. This could include opportunities for school leaders, mentors and ECTs to be consulted on the work of the TSH.

Question 2: Based on your overall experience, to what extent do you agree that ABs are carrying out the following responsibilities of their role effectively?

14. The AB plays a vital pre-emptive role in supporting the school system to mitigate risks. This works through building strong relationships with school leaders, with local union representatives and with LA partners, to understand the contexts within which the schools are working and to spot difficulties early. This role must not be lost during this transition.

15. The ECF has been in place for less than a year, and changes to the way in which induction takes place have not had time to bed in. While the DfE believes that familiarity with the programme will bring down workload for ECTs, mentors and induction tutors, in this first year workload has been high, and many ABs have yet to get to grips with how to support schools to ensure sufficient time to engage with the new programme. Workload was also identified as a problem in the EEF/UCL study of the early rollout of the ECF ([Early Career Teacher Support](#) (November 2020)) which unsurprisingly suggested that this is something which ABs will need to oversee carefully. ASCL would expect that further evaluations, including the NFER evaluation of early rollout, will consider the role of the AB.
16. According to Teacher Tapp ([Early Career Teachers: The Story So Far - Teacher Tapp](#) (April 2022)) in the first term of the ECF, a quarter of primary school leaders and a fifth of secondary school leaders said they had not been giving enough time to mentors to carry out their role. Almost half of mentors themselves said they had not been given additional non-contact time for their mentoring role. Teach First has evaluated its own ECF programme and reports that 13% of mentors were engaging with training on a Sunday and a further 27% after 6pm on a weekday. ([What we've learned from the Early Career Framework | Teach First](#) (April 2022)). There will be many reasons why school leaders have found it difficult to free up experienced teachers to carry out their mentor duties, including the continuing impact of the pandemic on top of the unresolved workload crisis. This is exacerbated in schools which offer mentoring for ITT alongside that for both year 1 and year 2 ECTs, particularly when late appointments or late ITT allocations happen after timetabling has been finalised. School leaders are finding it hard, with the current difficulties of recruitment, to find suitable mentors within the subject, and when they do, they are finding that they have to timetable split classes or non-specialists to teach classes in order to free up mentor time.
17. This would suggest that the responsibility of ABs to ensure sufficient time for mentors to undertake their duties will be extremely difficult to fulfill. The solutions will need to include a fundamental review of workload and staffing, and not a 'strengthening' of the AB role or watering down of the mentor role.
18. In terms of the specific AB responsibilities outlined, ASCL believes that most are being carried out. However:
 - In some instances it appears that the induction tutor is assuming the responsibility to ensure the ECT and mentor are receiving statutory entitlements and being given the appropriate time to undertake their roles, rather than the AB.
 - There is concern that the responsibility to agree extensions or reductions to the length of the induction period is not straightforward, and that ABs will need specific guidance on this, particularly in the case of reductions for experienced staff. These decisions will also need to be evaluated for their equalities impact.
 - Particular concerns were noted about AB support for ECTs experiencing difficulties, and ensuring actions are taken to address areas of performance that require further development, as well as where an AB may be dealing with upwards of 100 ECTs over a large geographical area (a number which will grow now that induction is a two-year programme). This has been exacerbated this year, due to more ECTs trained during the Covid lockdowns suffering serious difficulties.

Question 3: To what extent do you agree that the following aspects of the formal assessment process add value to the induction experience of ECTs and the teaching profession more generally?

19. There is an important distinction to be made between the Early Career Framework and induction. Historically, starting with the James Report in 1972, the process of support and learning for new teachers has been identified separately from the process of assessment. Probation, as it was called then, or induction, is the process of assessing teachers to ensure that they can carry out the 'tasks' of teaching, and meet the teaching standards that ensure that they are suitable to join the profession. That assessment is carried out by an independent body, in conversation with the headteacher, in order to provide assurance of quality and consistency of judgement throughout the profession.
20. We are strongly of the view that it is essential that both parts of the system are properly funded and resourced, that the quality of both parts are maintained, and that the ECF remains a framework for learning and support and not a set of assessment criteria.
 - ***Two formal assessment points, one midway through induction and another at the end of the induction period.***
21. **STRONGLY AGREE:** it is vital that ECTs have a really good understanding of their strengths and weaknesses against the teacher standards at the mid-point of their induction, in order to be able to seek any specific support that they need in plenty of time. This also gives time for school leaders to reflect on what is needed to enable the ECT to meet the standards and to plan appropriately, ensuring that ECTs are timetabled in classes where they can flourish, and that mentors are given the time needed to provide feedback and guidance. Where ECTs move school between the first and second year of their induction, a formal record will enable leadership at the new school to quickly provide the input required, so that an ECT does not lose momentum in their learning.
22. To ensure that teaching remains a high-quality profession, it is important that only those who can demonstrate that they meet the teaching standards are able to continue in the profession, and a formal assessment at the end of induction allows for those standards to be maintained consistently.
23. Formal assessment against the teaching standards, appropriately reviewed by the AB, mitigates against bias, and can give headteachers confidence in appointments.
24. However, there is some concern that waiting until the end of the first year for a formal assessment may prove to be too long. Often those who are struggling are recognised early on, but under this system they can continue working in the school for two years before they pass or fail. Schools are finding they have to use their Capability Policy if an ECT is struggling. As well as being an inappropriate mechanism for the ECT, this is an inflexible and time consuming process for the Induction Tutor, mentor and the school. Mechanisms are needed to ensure that concerns raised during an informal progress review can trigger immediate support without waiting for a formal assessment.
 - ***Progress reviews, one in each term where a formal assessment is not held.***
25. **STRONGLY AGREE:** Induction is a complex process, with ECTs developing skills and practical knowledge, building relationships and using the ECF training to improve classroom practice. Progress reviews allow them to see how that learning is

developing their ability to meet the teacher standards, and to learn early whether there are problems to be resolved. The process allows ECTs to be in control of their progress and to raise concerns early, and it ensures there are no surprises when the formal assessments take place. If further flexibility is allowed within the ECF, progress reviews will enable ECT and mentor to flex the programme as required to meet needs. As reviews should be part of normal practice, there should be no additional workload.

- ***Marking the end of induction through a pass/fail based on the ECT's performance against the Teachers' Standards.***
26. **STRONGLY AGREE:** To ensure that teaching remains a high-quality profession, it is important that only those who can demonstrate that they meet the teaching standards at the end of induction are able to become fully qualified. Having a simple pass/fail judgement should ensure that workload does not multiply through the introduction of complex assessments against each individual standard.
- ***Independent verification of the headteacher's recommendation on pass/fail by the AB.***
27. **STRONGLY AGREE:** It is important that there is consistency in applying the standard. Meeting the teaching standards at the end of induction is different from meeting them at the end of ITT and will develop further as the ECT moves from novice to expert. Independent verification provides a measure of fairness in the judgement process, and should ensure that the whole process of induction, mentoring, reviews and final judgement comes under proper scrutiny. As the 2002 evaluation of induction ([Evaluation of the Effectiveness of the Statutory Arrangements for the Induction of Newly Qualified Teachers](#)) showed, this provides reassurance to both ECT and headteacher.
28. ASCL believes that the end of induction marks an important milestone in a teacher's career, and is also a vital marker for the profession, demonstrating that an ECT can meet the teaching standards within their own classroom, subject/phase and school context. A formal, national process is essential for ensuring that this is induction into the profession and not just into a particular school or Trust.
29. It is vital that the quality of judgement is consistent across local areas, Trusts and ECT programmes and it may be that there are opportunities for some light-touch moderation within this process. This would need to be carefully managed so that it did not add to leader workload.

Question 4: Would a shift to a predominantly TSH AB sector from 1 September 2023 provide a sufficient transitional period for LAs to wind down their AB service provision and for TSHs to build their capacity to cover need?

If no or maybe, why is this not sufficient time and what length of time do you believe is needed to facilitate a successful transition?

30. No.
31. There are risks to moving from an LA provision of the AB service to Teaching School Hubs, for the LAs and TSHs, for ECTs and mentors, and for the schools which employ them. The transition process needs to be sufficiently long and robust to manage those risks.

32. According to the government guidance 'Find an Appropriate Body' from March 2022 ([Find an appropriate body - GOV.UK](#)) there are currently 207 ABs (along with the national ABs of ISTIP and NTA), of which 84 are TSHs and 123 are LA. This shows the scale of the challenge to be undertaken during this transitional period, as well as highlighting the risks going forward as ECT numbers increase. The transition period must include robust support for ECTs and mentors who must move between ABs and give sufficient time for school leaders and induction tutors to manage the transfer of paperwork. A workload impact assessment of the time this will take would be helpful to manage the process.
33. The teacher supply model predicts a need for 10,000 new teachers a year, with the implication that these ECTs would need to be distributed between 87 TSHs. As the ECF is also a two-year programme, this would mean approximately 230 ECTs per TSH, although they are unlikely to be evenly distributed. The impact on the workload of TSHs could be enormous, with consequential risks for the quality of support and assurance for ECTs and the teaching profession. The DfE should carry out a thorough workload impact assessment, to identify how much time per school/ECT is needed on average. They should also model different staffing and resourcing examples to establish how many ECTs/schools each TSH can realistically be responsible for, alongside their other responsibilities, and should plan accordingly.
34. According to DfE evidence, 40% of schools are still using the LA as their AB. Most schools not in a MAT have chosen to remain with the LA as their AB, while most schools in a MAT use a TSH. ([Evaluation of the national roll-out of the Early Career Framework induction programmes year 1 interim report](#), page 9) This suggests that many schools are happy with the relationship with their LA, relationships which have built up over many years.
35. Trust between a school and its AB is vital; schools need to know that their AB has the appropriate experience and will provide support. This trust is built up over time and through good experiences of the advice given to schools and the specific support given to ECTs who are struggling. While the transitional period may give sufficient time for the administrative handover from LAs to TSHs, the DfE must not overlook the time, capacity and resources needed to build relationships of trust.
36. The same evidence reports that TSHs deliver ECT training to 73% of schools. There would seem to be some risk involved in a programme which allows the same body that delivers training to also '*provide independent quality assurance of statutory induction*' ([Induction for early career teachers \(England\)](#), page 16), unless there is a transparent process of accountability for the TSH. There are risks that a TSH could act in the vested interests of its training provision rather than the best interests of the ECT.
37. As there will be only 87 TSHs in the first instance, many will take on the work of more than one LA. The risks for smooth transition increase as a TSH works across different LA processes to build a single model for its schools. Where LAs have worked together to share expertise as ABs, this will reduce the workload burden for TSHs, but this will not be the case consistently across the country. In some instances, Teaching Schools collaborated to deliver ITT, CPD and school-to-school support, and where the TSH has grown out of the Teaching Schools model, AB responsibilities, processes and protocols may also have transferred seamlessly. It is important that the DfE understands the different transitions that will be made in different regions of the country, in order to provide targeted support to ABs during the transition period.
38. The geographical reach of each TSH will be large, and they will need to spend

significant time and money on building relationships with schools some distance away. This has implications for the efficiency and immediacy of AB responses to schools or ECTs in difficulty. This could have particular impacts for ECTs who need additional support, whether because they are in danger of failing or because they have protected characteristics. It will be particularly acute in rural or coastal areas, where transport links are minimal. This could be compounded as induction is organised at Trust level, where Trusts include schools in areas that are different to the area served by the TSH. While some work can be carried out remotely, online activity is no substitute for face-to-face support for building strong relationships of trust.

39. There is a great deal of expertise in the LA sector around NQT/ECT induction, and in many instances excellent relationships between the LA team and the schools (and unions) in the local area, which will take time to build for some TSHs. There are areas of regional excellence and collaboration, for example the London Induction Coordinators Group, which will be lost. With the increasing uncertainty over LA roles in education, and difficulties with funding, many LAs will find it hard to retain expert staff. This will have a knock-on effect on the resources and expertise available to support schools and ECTs with the new ECF. There is a danger that this expertise will be lost to the sector, much of it before the end of the transition period.
40. TSHs will be applying for redesignation from September 2024. We presume that the procedure for redesignation will need to be designed from late 2023 (this round of TSHs were designated in February for a September start). It would therefore make more sense for the full transition of responsibilities for the AB role from LAs to TSHs to be aligned with the redesignation, and to begin from September 2024 rather than 2023. Otherwise, we risk having some TSHs either not applying or not being reaccredited, or new TSHs coming onboard after the transition. Where TSHs are redesignated as ABs there must be a robust process of support for ECTs and mentors who transfer from one AB to another.

Question 5: Do you believe this reform to the AB sector will cause any barriers or challenges for you, your organisation, or those you provide services for? If so, in what ways, and how can we help facilitate solutions to these challenges during the transitional period? Your answer could include specific implications for your organisation including ending contractual obligations and other commitments, and any impacts (either positive or negative) on individuals with protected characteristics.

41. ASCL is concerned about potential conflicts of interest in the TSH role. A TSH is expected to provide school-based ITT, the ECF, NPQs (including the NPQ for leading teacher development, which mentors may be encouraged to take), provide guidance to the school, and hold responsibility for ensuring that the school meets the requirements and provides all the necessary support for an ECT. There is a risk that it could be difficult to disentangle the role of TSH within the Early Career Framework and its role in quality-assuring induction.
42. The TSH as AB has a role in safeguarding both the ECT and the school. But there is no impartial player to offer support if for example both mentor and ECT are struggling with the demands of the ECF being offered by the TSH.

43. There are also, potentially, differences in relationships between a TSH and the schools it serves, depending on the function being carried out. The role of AB calls for a relationship of oversight and quality assurance, where providing NPQs or ITT will be more a support and professional development relationship. While these are not necessarily incompatible, a TSH and its leadership team will need to be very clear in its divisions of responsibility.
44. ASCL agrees that a TSH cannot be an AB for an ECT for whom it recommended the award of QTS. However, this means that schools may well have to work with two or more ABs, which may have different paperwork requirements, different support mechanisms and more relationships to build, all of which add to the workload of school leaders. It is not clear that the DfE has data on the numbers of ECTs and schools for whom this will be the case, or any modelling of this for the future as the ITT market changes.
45. This has particular risks for ECTs who are career-changers, who have caring responsibilities, those with disabilities, those who cannot afford to move away from home to train, or those from particular ethnic groups, all of whom are more likely to seek to both train and work in the same local area.

Question 6: Do you have any other comments on the role of the ABs or statutory teacher induction?

46. It is vital that decisions on who passes and fails induction, as well as decisions on extensions and reductions to induction, are monitored for the impact on those with protected characteristics. There should also be an overall equalities assessment of decisions made with regard to progress reports and support given. This is particularly important as recent research shows the ethnic disparities in progression from ITT to QTS and into teaching ([Racial equality in the teacher workforce, NFER](#)). This does not appear to be a responsibility of the Teaching Schools Hubs Council, which has only an advisory and a capacity-building function. ASCL believes that there could be a useful role here for the Chartered College of Teaching, as the professional body for teachers and dedicated to improving the status of the profession, to provide quality assurance of the ABs and the ECF programme.
47. As induction does not have to be carried out to work in an academy or free school, if the government's ambition for a completely academised system is realised, there are real dangers that an AB process that is perceived to be complex and workload-heavy will lead more Trusts to opt out of the induction process altogether, with potentially catastrophic implications for the quality and coherence of the teaching profession.
48. ASCL continues to support the Early Career Framework and the two-year induction period. We believe that this allows a continuation of high-quality pedagogy and a continuum of professional development from ITT to ECT+1. We are concerned about the inflexibility of some parts of the Framework, the duplication of material across the three years of initial training and then ECF, and the workload (including paperwork) for ECTs and those supporting them.

D. Conclusion

49. It is worth reflecting on the previous evaluation of Appropriate Bodies ([Evaluation of the Effectiveness of the Statutory Arrangements for the Induction of Newly Qualified Teachers](#)). Although carried out 20 years ago, there are important lessons to be learnt, including about the workload for ABs associated with the large numbers of schools involved, the amount of monitoring needed at the start of the academic year, and support for NQTs at risk of failing. There was a further period of intense work at the end of an academic year, chasing up final assessment reports, and in a small number of cases carrying out very time-intensive work leading up to a decision to fail an NQT.
50. This report also identified problems for ABs with having a single person responsible for both support and assessment of NQTs; of planning visits to schools at times which were suitable for both teacher and school leadership; and in monitoring their own performance as ABs without adding to the workload of school leaders. These current proposals do not appear to resolve any of those issues.
51. We hope that this response is of value to your consultation. ASCL is willing to be further consulted and to assist in any way that it can.

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