
Ymateb i Ymgynghoriad / Consultation Response

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Dyddiad / Date:	19.01.23
Pwnc / Subject:	Refresh of the 'Criteria for accreditation of initial teacher education in Wales'

Background information about Estyn

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

Our 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, we 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.

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

We may give advice to the Welsh Parliament on any matter connected to education and training in Wales. To achieve excellence for learners, we have 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

Overall, we agree that the revisions to the Criteria for accreditation of initial teacher education in Wales have resulted in a more detailed and helpful document for the initial teacher education sector in Wales.

In particular:

- The updated criteria reflect the current context of ITE and education in Wales.
- The recognition that there should be strong links between ITE and induction.
- The rewriting of Section A: A vision for initial teacher education in Wales provides a clear underpinning rationale for ITE programmes in Wales.
- We welcome the greater clarity provided about the expectations of roles in the partnership, particularly with regard to the role of lead and partner schools.
- The strengthening of requirements for the development of student teachers' Welsh language skills.
- The acknowledgement that ITE for ALN provision in Wales requires consideration.

However, we believe that in a few instances the document would benefit from greater clarity to ensure that the expectations of important aspects of ITE provision in Wales are explicit. We have provided greater detail in our responses to the consultation questions.

In particular:

- References to the Curriculum for Wales require clarification to avoid the risk of misconceptions.
- The development of student teachers' Welsh language skills, and the partnership's promotion of the Welsh language should be woven more thoroughly through the criteria.
- That there is a consistency of language and terminology throughout the document.

Consultation questions

Question 1

- i) Do you work in or support the delivery of initial teacher education (ITE)?
(If no continue to iv.)

Yes	✓	No	<input type="checkbox"/>
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- ii) If Yes, in which type of setting/organisation do you work?

ITE partnership – HEI	<input type="checkbox"/>	Local authority	<input type="checkbox"/>
ITE partnership – primary school	<input type="checkbox"/>	Regional consortium	<input type="checkbox"/>
ITE partnership – secondary school	<input type="checkbox"/>	Regulatory body (including inspectorates)	✓
ITE partnership – through school	<input type="checkbox"/>	Government	<input type="checkbox"/>
ITE partnership – special school	<input type="checkbox"/>	Other (please specify)	<input type="checkbox"/>

iii) What is your primary role?

Teacher education/student teacher mentor – HEI-based	<input type="checkbox"/>	Induction/NQT support officer	<input type="checkbox"/>
Teacher educator/student teacher mentor – school-based	<input type="checkbox"/>	Inspector	<input checked="" type="checkbox"/>
ITE partnership leader – HEI	<input type="checkbox"/>	Accreditation monitoring official	<input type="checkbox"/>
ITE partnership leader – lead partner school	<input type="checkbox"/>	ITE partnership leader – partner school	<input type="checkbox"/>
Other (please specify)	<input type="checkbox"/>		

iv) If you do not work in or support the delivery of ITE, in what capacity would you like to provide feedback?

Parent/carer	<input type="checkbox"/>	Professional associations including education workforce unions	<input type="checkbox"/>
Child or young person (under 18)	<input type="checkbox"/>	Third sector	<input type="checkbox"/>
Adult (not a parent or carer)	<input type="checkbox"/>	Training provider	<input type="checkbox"/>
Student teacher	<input type="checkbox"/>	Government	<input type="checkbox"/>
Newly qualified teacher	<input type="checkbox"/>	Student/academic	<input type="checkbox"/>
School teacher (not currently working as a teacher educator)	<input type="checkbox"/>	Headteacher (not currently involved with an ITE partnership in Wales)	<input type="checkbox"/>
Other (please specify)	<input type="checkbox"/>		

v) Are you providing feedback on behalf of an organisation or group?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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If 'yes', please specify.

Estyn

Question 2 – Have you read the 'Refresh of the Criteria for the accreditation of initial teacher education in Wales' consultation document?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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If you have selected 'No' we recommend you read the document before continuing with the response form.

Question 3 – Do you agree that the amendments to 'Section A: A vision for initial teacher education in Wales' in the document make more explicit the vision for ITE in Wales and the intellectual thinking required to design and deliver ITE programmes?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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If you have any comments related to your response, please use this space to elaborate.

Overall, the revised Section A defines a more explicit vision for ITE in Wales and clarifies an underpinning philosophy. The section is easier to read than previously and it explains helpfully the relationship between initial teacher education, and the early years of a qualified teacher's career.

The structure of this section, from the 'what' (ie. 'A vision of the teacher Wales needs') to the 'how' ('A vision of how student teachers learn' and 'A vision of how to make that happen') sets out clearly the thinking and strategic actions required of any ITE Partnership applying for programme accreditation.

In a few instances, the text in this section of the accreditation criteria would benefit from further sharpening to ensure that key messages and supporting information are as clear as possible for the wide intended audience. For example, the final bullet point on p.13, conflates two important areas of Welsh Government policy, that of (i) developing evidence and research-informed practice in schools, and (ii) tackling the impact of disadvantage and poverty on attainment. While schools may well use evidence and research-informed approaches to tackle the impact of social inequity on pupils' learning, progress and well-being, they are also likely to develop a culture of research and enquiry to improve other important areas of their work. It would therefore be better to separate these points.

It is also important that the content and terminology in this document aligns fully with that in other related Welsh Government publications. For example, p.13 refers to 'new assessment procedures'. It might be more helpful to refer to 'assessment *arrangements*', as in the Curriculum for Wales (Welsh Government, 2022) online guidance, as this has a less mechanical and prescriptive connotation. In addition, there is use of both 'mentor' and 'coach' in section 2.3 'The knowledge of expert practitioners'. It would be helpful to clarify the term, 'coach' by providing a definition in the glossary.

There is helpful explanation in the section on 'how student teachers learn' about the professional knowledge that learning to teach involves. This could be enhanced further by ensuring that the document is mindful of any unintended consequences. In the example of inclusivity in teaching, the text refers to student teachers planning and delivering 'differentiated lessons'. This could be misinterpreted as a requirement for student teachers to deliver *different* lessons to different groups of pupils. Currently, there is no specific reference to meeting learners' needs in terms of their abilities and capabilities. It would also be helpful to simplify the text, 'disaggregate key concepts and reconstruct them in different ways', so that the intended meaning is clearer.

Question 4 – Do you agree that the amendments to ‘Section B: ITE programmes structures, processes, and inputs’ reflect the maturing educational reforms in Wales, make the requirements clearer, and further the quality requirements for ITE programmes in Wales?

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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If you have any comments related to your response, please use this space to elaborate.

This section of the document has been successful in reflecting the evolving picture of ITE in Wales since the inception of the accreditation process. It provides a sufficient level of detail in the type of content appropriate for ITE across diverse contexts in Wales.

We welcome the clear expectations for Partnerships to develop and evaluate their programmes through shared accountability and the additional section on the role of ITE in a research engaged profession. In a few places, the content under ‘leadership and management’ could be revised further to make the requirements more coherent and explicit, by grouping statements on a similar theme together, for example statements about:

- finance and funding
- the development and evaluation of programmes, and self-evaluation
- recruitment, selection and entry qualifications
- the Partnership’s research strategy, staff development needs and ongoing professional development for mentors
- national priorities.

The specialist term ‘close to practice’ is used several times in this section of the document. It would be helpful for the reader if a definition of this was included in the glossary.

While it is useful to signpost Partnerships to the national strategies and resources available to support them as part of developing their research strategy, there may be a need to future proof the examples provided.

We support the strong message under section 4.2 that only schools that are recognised for high-quality provision should be considered as suitable for student teachers. This section states, ‘Partnerships should normally avoid selecting schools that are currently in a statutory category of follow-up’. It might be helpful to provide a little more detail here, so that the audience is clear that this is referring to schools causing concern who Estyn has placed into a category of special measures or a category of significant improvement, as defined by the Education Act 2005 and any associated circulars. It is also important, within this section on criteria for the inclusion of schools in the Partnership, that reference is made to schools ‘with high levels of Welsh and/or English as an Additional Language’, and not just English as an additional language (p.21).

In section 4.3, there is reference to the need for in-school support to include ‘assessment of the extent to which student teachers have evidenced meeting the standards during their school experience’. This suggests that the school’s role is to ‘assess’ the quality of the *evidence* a student teacher provides, rather than assessing whether the student teacher meets the required standards for teaching and leadership to be awarded qualified teacher status. We suggest a refocusing of this statement so that it aligns with section 5.12 on the assessment of student teachers.

In this iteration of the criteria, we agree there is stronger reference to self-evaluation for continuous improvement and quality assurance processes, as part of the leadership and management of programmes. Section 4.4 provides a very clear overview of the roles and responsibilities of lead partner schools, including their role in a programme’s quality assurance, self-evaluation and planning for improvement processes.

Section 4.5 sets out the requirements for university teaching staff to have particular qualifications and experience. The wording is, at times, ambiguous and we suggest clarification would be helpful in ensuring the requirements are understood clearly and support the fundamental principles for ITE in Wales, specifically in relation to:

- ‘*In the main, all HEI-based teacher educators should have been successful school teachers.*’
- ‘*All HEI-based teacher educators should normally be research active...*’ (p.25).

We welcome the strengthening of the requirements relating to the Welsh language (section 4.6) and the clear reference to *Cymraeg belongs to us all* (2022) in the refreshed draft criteria, as a key Welsh Government policy priority. However, we note that the criteria does not currently make reference to ‘Global Futures: A plan to improve and promote international languages in Wales 2022 to 2025’ (Welsh Government, November 2022). Within this national policy document, it sets out Wales’ clear ambition to become a ‘truly multilingual nation’. Strategic aims 1 and 2 within the Global Futures plan make direct reference to the role of initial teacher education providers in supporting the development and delivery of meaningful international language provision in Wales. Therefore, we suggest that this important role is reflected appropriately within the refreshed accreditation criteria.

Within Section B of the document there are a few instances where we think the clarity could be further improved to reduce the risk of misconceptions arising, notably in relation to the Curriculum for Wales.

We suggest that discrete reference to oracy (as a national priority alongside literacy) is removed from p.29, as Welsh Government’s definition of literacy within Curriculum for Wales includes the skills of listening and speaking. The example implies that literacy in Wales only refers to reading and writing, which is not the case. It is also important that throughout the document there is consistent reference to digital *competence*, rather than ‘digital competency’, as one of the mandatory cross-curricular skills within Curriculum for Wales.

Within sections 5.4 and 5.6, the criteria that refers to the age range of learners that student teachers are prepared to teach is not clear: ‘...all student teachers are prepared to teach all learners across at least two consecutive *progression phases* in schools as described under the Curriculum for Wales’ (p.29). Currently, there is no use of the term ‘progression phase’ in Curriculum for Wales and the seeming conflation of the terms ‘progression steps’ and ‘age phases’ is problematic. There is a need to define the year groups that student teachers would be prepared to teach in a particular programme, for example Years 3 to 9.

The following statement also risks driving misconceptions and unhelpful practices: ‘ITE Partnerships must be clear in their submissions on the *progression steps* individual programmes are preparing student teachers to teach...’ (p.32). This presupposes that learners will reach progression steps within particular year groups and does not reflect the philosophy of the learning continuum for individual learners in Curriculum for Wales. We suggest the statement be reworded as, ‘ITE Partnerships must be clear in their submissions on the age groups that individual programmes are preparing student teachers to teach.’

We agree that it is important to emphasise that progression for learners is central to teaching and curriculum design in Wales, and that student teachers need to understand the principles of progression. However, in section 5.6, progression is only described in terms of student teachers being familiar with those processes that support learner progression towards the four purposes. We suggest reference is also included to student teachers ensuring they develop an understanding of the principles of progression within each area of learning and experience. In section 5.6.2, reference to ‘knowledge of content appropriate to *student teachers’ chosen age-*

phase/progression steps... in the content of subject studies (p.32) could also undermine providers and practitioners' understanding of learner progression, as intended in Curriculum for Wales.

It would be helpful for providers, if it was made clearer that professional and pedagogical studies, school experience and subject studies are course design requirements for accreditation, for instance, by adding this to the bullet point list on pp.29-30 that begins with the stem, 'Programmes should'.

Within section 5.8 on Well-being and or section 5.9 Programme content, we recommend including appropriate reference to the Relationships and Sexuality Education (RSE) Code, as this is listed in the References.

Question 5 – Do you agree that the amendments to 'Section C: Programme outcomes' reflect the maturing educational reforms in Wales, make the requirements clearer and more explicit, and further the quality requirements for ITE in Wales?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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If you have any comments related to your response, please use this space to elaborate.

The amendments to Section C are successful in clarifying the requirements for the fulfilment of the standards for Qualified Teacher Status. The signposting to additional guidance (Appendix 3) for Partnerships is helpful and we support the ongoing inclusion of this useful advice.

We welcome the stronger alignment and emphasis on the professional collaborative working relationships between ITE Partnerships and the bodies responsible for the induction of NQTs to support student teachers' transition to their first year of teaching.

Question 6 – Do you agree that the amendments to the following sections:

- 'Glossary'
- 'References'
- 'Appendix 2: Entry requirements for student teachers in Wales'
- 'Appendix 3: Standards for Qualified Teacher Status – further advice for ITE partnerships in the design of programmes'

support the changes to the main body of the document?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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If you have any comments related to your response, please use this space to elaborate.

Please refer to our responses for questions 3, 4 and 5.

Question 7 – Do you agree that the inclusion of ‘Appendix 4: Specialist primary phase ITE provision for ALN’ clearly outlines Welsh Government’s aims to determine whether any changes are required in the Wales ITE framework to meet and support the requirements and aspirations of learners with the most complex additional learning needs?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
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If you have any comments related to your response, please use this space to elaborate.

We welcome this proposal and broadly agree that the appendix conveys Welsh Government’s aims and plans to determine whether any changes are required in the Wales ITE framework to meet and support the requirements and aspirations of learners with the most complex additional learning needs. It would be helpful to strengthen the information about whether this proposal is in relation to general additional learning needs for learners in a special school or ALN specialist class, or more specifically in relation to a particular type of additional learning need, for example autistic spectrum condition.

We have a number of questions about the proposed specialist primary phase ITE provision for ALN:

- Has Welsh Government engaged with the special schools who are already involved in providing school experience for student teachers, while gathering stakeholder evidence to inform this iteration of the Criteria?
- What would the specialist ALN settings be? Would these be maintained special schools, pupil referral units and local authority specialist classes? Would the approved settings include independent special settings?
- How will HEIs work with lead and partner schools to prepare student teachers to work specifically within these settings?
- Why is there only a proposal for a primary-specific PGCE? What is the approach for the workforce supply of secondary ALN specialists? Is there an assumption that primary-trained specialists can transfer their skills, knowledge and understanding to older learners, irrespective of their particular type of additional learning need?
- How will Welsh Government ensure that the EWC Accreditation Board has the necessary expertise to judge the accreditation of specialist ITE programmes for ALN?

Question 8

We would like to know your views on the effects that the refreshed criteria would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

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

Supporting comments

We welcome the clear reference to *Cymraeg belongs to us all (2022)* and Welsh Government’s ambition of one million Welsh speakers by 2050 in the refreshed criteria. This is clearly linked to the implementation of Curriculum for Wales and the development of a skilled Welsh-speaking workforce with useful reference to Welsh Government strategy and planning documents. We

believe the refreshed criteria will have a beneficial impact on the opportunities for student teachers and tutors to use Welsh within ITE programmes.

The initial introduction for the criteria for the Welsh language 4.6 refers to 'School categories according to Welsh-medium provision' before noting 'partnerships are also encouraged to move along a linguistic continuum.' This reference does not make clear what 'a linguistic continuum' might mean in the context of ITE partnerships and could result in little development over time. We suggest further clarification to outline the expectations for development over time in line with the Welsh in education workforce plan.

We welcome the reference to the development of a clear vision, including the implementation and evaluation of a long-term strategy to ensure a systematic and sustainable approach to the Welsh language within ITE partnerships. However, 4.6.1 seems to refer to leadership within the HEI led aspects of programmes without reference to how the vision, implementation and evaluation of provision for the Welsh language should be developed through joint working across partnerships including lead and placement schools. This means that important, interrelated aspects of learning and teaching are fragmented as the vision does not include how it will impact upon practice in schools. Please see response to question 9.

The reference to student teachers preparing to teach in Welsh is not clear. Does this refer to all students, student preparing to teach in Welsh medium or bilingual settings or student teachers who teach Welsh? We suggest the reference to 'developing provision for students preparing to teach in Welsh' does not encapsulate the bullets noted. We suggest 'All partnerships should develop a clear vision for the strategic approach they will take to the development of provision for the promotion and use of the Welsh language including the implementation and evaluation of the strategy'

We welcome the clear steer provided by the criteria that articulates the expectation that ITE partnerships develop provision over time. However, these expectations will require considerable professional learning for HEI staff (reflecting those of the general education workforce). We suggest that it may be helpful to reference the professional learning offer for the Welsh language [Welsh language professional learning - Hwb \(gov.wales\)](https://www.gov.wales/welsh-language-professional-learning).

The refreshed criteria make valuable reference to the language competency framework for education practitioners and provide useful guidance on the expected provision to support the development of student teachers' Welsh language skills, including support for teaching. The expectation that student teachers receive a minimum of 35 hours of Welsh language skills development per year is welcomed. We also welcome the intention to encourage all Welsh-language students to undertake at least one placement in a Welsh-medium school. However, the Welsh in Education workforce plan states that ITE partnerships should 'provide one placement in a Welsh medium school to all Welsh-speaking students'. We suggest that the wording should be clarified to reflect this statement more closely. This may impact on ITE partnerships with the need to recruit more Welsh medium providers across primary, secondary and all age sectors. It may be useful to outline if the 35 hours of Welsh language skills development includes provision for students while on school placement.

Our upcoming thematic report on how well ITE partnerships support the development of student teachers' Welsh language skills, including teaching through the medium of Welsh (to be published in September 2023), will include cameos and case studies of best practice to support ITE partnerships in the development of provision.

The references to assessment in accordance with the Welsh language competency framework, which links to induction to inform ongoing development are beneficial. This will help to develop an integrated approach to Welsh language development across the education workforce in Wales. However, our inspection evidence suggests that many schools are not aware of the

framework and linked professional learning offer. In addition, the professional learning offer should include opportunities for teachers to develop their pedagogy of language acquisition while developing their personal skills. We suggest that the criteria include a statement that supports partnerships to work with their partner schools to develop a better understanding of the framework.

Question 9 – Please also explain how you believe the proposed criteria could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Supporting comments

The proposed criteria could be developed to make clearer references to school-led elements of initial teacher education in relation to the Welsh language. This should be included holistically to reflect the vision that ITE is a partnership between a HEI provider and schools, and not as a separate section. Connections should be made clear between HEI-led Welsh language sessions and the practical experiences of student teachers in placement schools. Many requirements for the development of the Welsh language outlined in the consultation document refer to HEI-led aspects of programmes.

Evidence from our summary of the [2021-2022 annual report](#) notes ‘During the lockdown periods, pupils did not have enough opportunities to develop their Welsh language skills. This has had a significant impact on pupils’ fluency and inclination to speak Welsh in all types of schools’. It is important that ITE partnerships recognise the need to prioritise the development of pupils’ Welsh language skills as an important aspect within student teachers’ school experience.

The criteria should consider how placement schools contribute to the development of student teachers’ Welsh language skills. The criteria should make clearer reference to expectations of school-based learning sessions and the school experience. This could include:

- an expectation that the vision for the ITE partnership refers to how HEI and its partner school will work together to develop provision for the Welsh language.
- opportunities for student teachers to contribute to placement schools’ approaches to the development of pupils’ understanding of the benefits of multi-lingualism and an understanding of Wales’s language, heritage and culture
- learning sessions that include the pedagogy of language acquisition, particularly the development of oracy skills, teaching approaches to support the development of pupils’ Welsh language skills and support for late-comers to the Welsh language.
- support for student teachers’ Welsh language skills during school placement (for example, from a language mentor).

The evaluation of a partnership’s provision should consider how well:

- lead and placement schools promote and develop provision to support student teachers to develop the Welsh language during school experience.
- the partnership supports the professional learning for the Welsh language skills of staff to promote this aspect across the school community.
- it will prepare schools to move student teachers along the language continuum.

We believe that consideration should be given to what the language continuum may look like for ITE providers to ensure a common understanding around expectations for the future.

Question 10 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Within the document, references to undergraduate programmes when describing the types of courses submitted for accreditation are inconsistent, for example:

- ‘...they are intended to be appropriate for both full and part time PGCEs and BEds.’ (p.11)
- ‘Whilst it is anticipated that most programmes submitted for accreditation will be either PGCE or BA undergraduate...’ (p. 29)

We suggest use of the nomenclature ‘undergraduate degree with QTS’, so as not to signify a preference.

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