

**Cyngor Addysgu
Cyffredinol Cymru**

**General Teaching
Council for Wales**



**Response to the
Lifelong Learning UK consultation
on developing a new
Teacher Qualifications Framework
for Wales (TQFW)**

Introduction

1. The General Teaching Council for Wales (GTCW) is the statutory, self-regulating professional body for teachers in Wales. It seeks to raise the status of teaching by maintaining and promoting the highest standards of professional practice and conduct in the interests of teachers, pupils and the general public.
2. The GTCW aims to provide an independent, representative and authoritative voice for the teaching profession in Wales and seeks to provide robust advice to the Welsh Assembly Government and other organisations on teaching issues.
3. The Council welcomes the opportunity to respond to LLUK's consultation on developing a new Teacher Qualifications Framework for Wales (TQFW). We will be responding in broad terms to the proposals outlined in the document because of the very short timescale provided for consideration and response.

Context

4. The advent of 14-19 Learning Pathways in Wales and the new Diplomas being introduced over the next few years assume a common set of entitlements and a range of optional routes for learners. This challenges the status quo where different policies and regulations apply to learners in school and college settings. The public does not differentiate between vocational and non-vocational courses and will not understand why some rules would apply to one sector (schoolteachers) and not the other (FE lecturers or teachers). There is a need for cross-sectoral coherence and consistency of approach in developing a new Teacher Qualification Framework for the lifelong learning sector in Wales.
5. The Council has always had a specific concern regarding the implementing of entitlement to the Learning Pathways, namely that young people in the 14-19 cohort should be able to expect a level of parity between the professionals they encounter in different learning settings. Although pay and conditions do not fall within the brief of the Council, the Council has noted that pay parity has been achieved for teachers in FE in line with their school-based peers. This position is linked, but not within the scope of this consultation, in terms of parity of professional standards. The Council considers that the proposals, in being considered in isolation from these other two issues, do not adequately reflect the policy aim to '*develop and improve flexibility of deployment within and across sector boundaries*'.
6. Against this background certain of the fundamental assumptions in the consultation document would appear to compromise the strategic vision outlined in *The Learning Country – Vision to Action* in terms of the intention to '*drive up standards of teaching and attainment in all learning settings. We aim to develop and improve flexibility of deployment within and across sector boundaries. We will also explore ways of paralleling developments, on induction and early professional development that has been introduced for schools, for teaching staff beyond the school setting*'.

7. The two overarching assumptions within the consultation paper causing greatest concern are:
 - a. 'identify the qualification as appropriate for all teachers, tutors and trainers in the lifelong learning sector in Wales, irrespective of whether they are employed on a full or part-time basis'
 - b. 'identify that the Teacher Qualifications Framework for England has been used as a starting point for the development of a Teacher Qualifications Framework for Wales'

Specific areas for concern

8. It is felt that the attempt to encompass the diverse roles found within the lifelong learning sector inside a single framework is fundamentally flawed and that it does not reflect the complexity of the FE, WBL and community learning workforce. There is a need to differentiate the role of teachers from others involved with learning to avoid the potential dilution of standards for teachers and in turn impact negatively upon the parity of learner entitlement to high quality teaching, particularly within the Learning Pathways.
9. Similarly, the desire to base a framework on that used in England ignores the highly effective Professional Development Framework and practices for teachers in a school setting in Wales and would appear to compromise the strategic vision outlined in *The Learning Country – Vision to Action* in terms of not paralleling development for school teachers into other settings. This is particularly relevant to the highly successful Professional Development Framework developed by the Council in partnership with teachers and the Welsh Assembly Government.
10. The paper also fails to address issues around the relationship or equivalence with the existing Qualified Teacher Status for school teachers, which is of particular relevance within the context of shared delivery of teaching programmes within the Learning Pathways.
11. The proposal to develop a framework that assumes a minimum of NQF Level 5 again raises real concerns in terms of parity for teachers working with young people in different settings within the Learning Pathways. When compared with a school setting it would be perceived as a dilution of standards for teachers.
12. There appears to be confusion and inconsistency within the terminology used throughout the document and this is also mirrored in the confusion around a view of external testing of the common core, with one reference being in favour and one against. GTCW would want to see parity with the arrangement for the QTS in Wales.
13. The very limited time for response to the consultation has not enabled us to undertake the detailed analysis such strategic proposals require.

Conclusion

14. The Council takes the view that the currently proposed framework fails to recognise the developments that have taken place in Wales to date and the fundamental issues of parity for teachers involved within the Learning Pathways.
15. The approach that is currently outlined appears to lack consistency with the key policy drivers in Wales and attempts to graft an England-based solution on to an increasingly different Welsh educational system.
16. The approach fails to recognise the good practice developed within the school-based sector for teachers and the need for parity amongst teachers within the Learning Pathways, regardless of the setting.
17. The Council would welcome the opportunity to provide input into an approach that would develop a solution more relevant to the needs of Wales, rather than importing a framework suited to the needs of a different educational system.