

**Department for Education consultation
Strengthening Qualified Teacher Status and improving career progression for
teachers
Submission from the University and College Union**

Summary

1. The University and College Union (UCU) is the UK's largest trade union for academics and academic-related staff in higher and further education, representing over 100,000 members working in universities, colleges, training providers, adult education settings and prisons.
2. UCU welcomes the opportunity to respond to this consultation. Many of our members are involved in the delivery of teacher education at higher education institutions (HEIs) across the UK, and will therefore be affected by any changes to the way in which Qualified Teacher Status (QTS) is awarded. We have focussed our response on areas which relate to our members and their concerns.
3. The consultation's focus on strengthening the professional development of teachers throughout their careers is positive. Ensuring teachers can access CPD which helps them to develop and progress is vital for maintaining a well supported and high-quality education workforce. Higher education has a key role to play in supporting professional development in education at all levels.
4. However, UCU has major concerns about the proposal to decouple QTS from Initial Teacher Training (ITT), particularly in terms of its implications for teacher recruitment, teacher education departments in higher education institutions, and QTLS equivalency.

Responses to relevant consultation questions

Q1: Do you think that QTS should be awarded after a period of sustained professional practice rather than the end of ITT?

5. No. UCU is concerned about the proposal to decouple QTS from ITT and link it to sustained professional practice because of the serious implications it would have for teacher recruitment and for higher education institutions providing ITT.
6. It is absolutely right that teachers should require extensive and rigorous training in order to become qualified. However, under the proposal it would take a trainee teacher an extra two years to gain qualified status. This is potentially a major disincentive for those considering embarking on a teaching career, particularly for students who are graduating with significant debts from their time at university.

7. Although the consultation recognises that any changes to QTS should not affect pay for new teachers, the changes would reduce the potential speed of early-career progression, which may be off-putting for some graduates. They would also add further complexity to an already confusing system for teacher recruitment. At a time when the government is already missing its targets for recruiting trainee teachers¹, making the route to QTS longer and more complex seems like a huge risk.
8. The proposal must also be viewed in the context of the government's ambition to expand school-led teacher training, as set out in the recent white paper *Educational Excellence Everywhere*. UCU has previously raised concerns about the impact of this approach on teacher recruitment. Compared to HEI-led routes, SCITT programmes have been worse at meeting recruitment targets². The national teacher supply model, which previously controlled through the government distribution of PGCE places to the network of university providers across the country, was also able to take account of regional differences in supply and demand, whereas the more individualised nature of SCITT often cannot. Further moves which make teacher education less appealing may only compound those problems.
9. Detaching QTS from ITT and linking it to practice alone also has the potential to undermine the importance of the reflective and theoretical aspects of teacher development. All current ITT programmes already include significant periods of professional practice, but teaching is more than a practice-based craft. To deliver excellence a teacher needs a theoretical and professional knowledge of education, an understanding of how children learn including the development of critical thinking skills, problem solving and collaborative working - alongside an expert knowledge of their subject discipline.
10. UCU is clear that the very best teacher education incorporates school-based learning and higher education working together in partnership to fully integrate theory, research and practice.³ However, if QTS is linked specifically to practice, it may act as an incentive for aspiring teachers to choose school-led ITT routes that are generally more practice-based than HEI-led routes.
11. UCU is therefore concerned that the proposed changes to QTS would make the prospect of undertaking a PGCE or other HEI-led teacher training course significantly less attractive, impacting on recruitment to university teacher education departments. This would further compound the issues with long-term planning which universities face as a result of changes to the teacher training allocations in 2016.⁴

¹ <https://www.nao.org.uk/report/training-new-teachers/>

² National Audit Office, *Training New Teachers*, Feb 2016, p39

³ Kelly and Pitfield, *Forum*, 55:3, 2013, p.449

⁴ National Audit Office, *Training New Teachers*, Feb 2016, p12

12. Overall, then, the government's approach to QTS reform has the potential to destabilise teacher education departments in universities. UCU has received anecdotal evidence that these proposals are already having an impact on decisions about the future of jobs and courses in some institutions. University education departments play a vital role in providing the research and expertise which informs good practice in schools - any move which further reduces the stability of teacher education departments is hugely damaging for the education sector overall.

Q2: Do you agree that a core early career content framework and CPD offer for new teachers should be fundamental to a strengthened QTS?

13. UCU believes that a strong CPD offer, with tailored support for early-career professionals, should be in place for new teachers regardless of how and when QTS is awarded.
14. The consultation links the introduction of an early career content framework and CPD to the need for better support to aid teacher retention. It also identifies existing good practice, such as the RQT programmes run in many schools. Rather than reforming QTS, with the risks that entails, it may be that the needs of new teachers could be met by sharing good practice and expanding RQT programmes to all schools.
15. All CPD offered to new teachers should allow for proper scrutiny of quality in terms of design and delivery; HEIs have a long tradition of validation and quality assurance and can play a key role in strengthening the professional development offer for teachers throughout their career.

Q3: What core competencies, knowledge areas or particular skills do you think should be developed in a structured way during the induction period?

16. UCU members in teacher education have indicated that ITT courses have to cover a lot of ground in a relatively short time, so there could be value in revisiting some ITT content in more detail once teachers are in post.
17. The best way to determine core competencies, knowledge and skills would be to engage directly both with new teachers and teacher educators who are well placed to determine where more support might be necessary for recent ITT graduates.
18. The consultation suggests that CPD within the content framework could offer masters' level credits; this is a positive aim and HEIs have a critical role to play in determining what areas would be suitable for this, as well as designing, delivering and assessing provision.

Q4: To achieve these objectives, do you think we should extend the induction period?

19. As stated in point 6 of this response, UCU is concerned that extending the time it takes to become fully qualified could be off-putting for potential trainee teachers, so

introducing a longer induction period may have a damaging impact on teacher recruitment.

20. Furthermore, UCU would be concerned about how the extra workload associated with another year of oversight and additional support for new teachers would be managed, given that the schools system already faces significant pressure in this regard. Any changes to how QTS is awarded and new teachers are supported would need to be properly resourced in order to be effective.

Q9: Do you agree that the QTS assessment should be conducted internally and be independently verified by an appropriate body?

21. No. In the interests of quality and fairness, UCU believes it is better for QTS to be assessed externally rather than within the school.
22. Teaching is a graduate profession and as such, there needs to be clear standards of entry, nationally agreed and enforced. The role currently played by HEIs in recommending trainees for QTS is important in maintaining objectivity and consistency of approach across the education system.
23. UCU has previously raised concerns about a move to assess QTS internally within schools because of the potential for variable standards between different schools. There is also a risk that, if the decision of QTS award lies with a school, new teachers may feel pressured to meet unreasonable demands (e.g. in terms of workload) because they fear QTS could be withheld if they do not comply.

Q10: How do you think we should strengthen the independent verification of QTS accreditation?

24. Appropriate bodies in charge of overseeing the award of QTS should be subject to a rigorous quality assurance process in order to ensure consistency of standards.

Q11: What role do you think ITT providers could play in the assessment and accreditation of QTS?

25. Notwithstanding UCU's concerns about proposed changes to QTS awarding, we believe that HEIs who provide ITT are well placed to act as appropriate bodies for the assessment and accreditation of QTS.
26. Under the current system, these providers make a recommendation for the award of QTS at the end of their ITT courses, so they already have significant experience in determining suitability for this award.
27. We agree with the suggestion in the consultation document that, in general, ITT providers should not act as the appropriate body for overseeing awards to new teachers who they employ or train, so as to avoid potential conflicts of interest.

Q15: Are there any other implications that we should consider, and what are your suggestions for addressing them?

28. UCU is concerned that the proposals for QTS reform does not adequately account for the impact of such changes on university providers of ITT. As outlined in point 12, university education departments are crucial in providing the research and expertise which informs our education system. If the sustainability of these departments is threatened by reforms to QTS, the whole education system will suffer. It would also be counter-productive in terms of the consultation's welcome aspiration for HEIs to play a greater role in the delivery of CPD and Masters' level content for teachers at the early career stage and beyond.
29. Equivalence for other teaching statuses is also an important issue. Since 1 April 2012, Society for Education and Training (SET) members with Qualified Teacher Learning and Skills (QTLS) status have been recognised as qualified to teach in schools, and this is highly valued by many teachers. UCU understands that QTLS is outside the scope of the current consultation but paragraph 57 of the consultation states that "we will review the issue of equivalencies between the proposed strengthened QTS and other statuses". We would expect that any review would work on the assumption that existing parity should be maintained and that existing teachers with QTLS will be able to continue teaching in schools. We would also expect that anyone engaged in a course of study towards QTLS while any review is undertaken would be unaffected should any changes result.

Q16: 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?

30. Yes.

Q18: 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?

31. Yes. These types of NPQs could appeal to the many teachers who do not wish to take on explicitly managerial roles, but who are passionate about their subject and wish to further develop their understanding. There is a clear role for HEIs in developing and delivering high-quality, subject-specialist content for NPQs which ensures high-level understanding that can be used to enhance teaching in schools.

Q20: Do you agree that a CPD badging scheme is something that should be developed? What organisations might be best placed to deliver this service?

32. It is imperative that CPD for teachers is of a high quality. A badging system could help protect against a 'race to the bottom' where providers seek to design and deliver courses for the lowest possible cost at the expense of quality.

33. UCU believes that universities should have a key role in ‘in-service’ teacher education as well as ITT, as they are best placed to provide high-quality courses informed by both research and practice. In many European countries, there is a more formally collaborative approach between HEIs and schools in developing and coordinating teacher education, which ensures quality and meaningful progression. There could be useful lessons for the UK system from countries including Portugal, where there is wider use of regional teacher education centres which were historically supported by specific funding and administrative frameworks, as well as an accreditation board for teacher education⁵.

Q21: How should government incentivise effective professional development for teachers, particularly in the areas and schools where it is most needed?

34. Good-quality CPD should be available and accessible to all teachers, regardless of the area or school in which they teach. Aside from the clear need for CPD to be properly resourced, tackling excessive workloads is a crucial part of ensuring that teachers feel able to effectively engage in CPD.

Q23: Do you think that a fund to pilot sabbaticals would be a positive step for the profession?

35. Yes. Experience from higher education shows that sabbaticals are extremely useful for personal and professional development. Encouraging teachers to take time away from their day-to-day work in order to undertake research and learn from practice in other parts of the education sector is hugely valuable. It is important that there are clear parameters for how sabbaticals are awarded to ensure they are fully accessible.

⁵ *Strategies of Change in Teacher Education: European Views*, 2002, p. 171-174