

Cynulliad Cenedlaethol Cymru | National Assembly for Wales  
Y Pwyllgor Plant, Pobl Ifanc ac Addysg | Children, Young People and  
Education Committee  
Ymchwiliad i Addysg a Dysgu Proffesiynol Athrawon – Gwybodaeth  
Bellach | Inquiry into Teachers' Professional Learning and Education –  
Further Information

TT FI 02

Ymateb gan: Cymdeithas Genedlaethol Prifathrawon Cymru  
Response from: National Association of Head Teachers Cymru (NAHT)

**NAHT welcomes the opportunity to submit evidence to the  
Children, Young People and Education committee.**

**NAHT represents more than 29,000 school leaders in early years,  
primary, secondary and special schools, making us the largest  
association for school leaders in the UK.**

**We represent, advise and train school leaders in Wales, England  
and Northern Ireland. We use our voice at the highest levels of  
government to influence policy for the benefit of leaders and  
learners everywhere.**

**Our new section, NAHT Edge, supports, develops and represents  
middle leaders in schools.**

The invitation to submit additional evidence to the National Assembly  
for Wales' Children, Young People and Education Committee  
concerning the inquiry on **Teachers' Professional Learning and  
Education**.

As requested, NAHT Cymru will focus specifically on the additional  
evidence concerning:

- The proposed implementation timescale; will teachers across Wales have the necessary time and resources to be able to genuinely match the descriptors of the new Standards by September 2018?
- Is there, or is there likely to be, enough support and training available to help teachers transition to the new standards?

**The proposed implementation timescale; will teachers across  
Wales have the necessary time and resources to be able to  
genuinely match the descriptors of the new Standards by  
September 2018?**

1. In our submission to the consultation on the new professional standards, NAHT Cymru noted that the overall vision for the new standards appeared to contain the right elements to support the development of professional teachers. We cited the work of Coe et al. ([What makes great teaching?](#)) (2014) which emphasises similar and

related areas (such as pedagogy, professional learning) – areas which we feel have been neglected in recent years.

2. In our submission, we also suggested that it would be the roll out and delivery of the standards that would prove critical. We will explore these related issues further in this evidence submission.
3. At the outset, it is important to note a degree of concern with the wording used by the Children, Young People and Education Committee in the focus on the proposed implementation timescale. To question whether ‘teachers across Wales have the necessary time and resources ***to be able to genuinely match the descriptors of the new Standards by September 2018?***’ suggests that by that date, existing teachers must have met all the standards, and this view does not resonate with our understanding of the intended functioning and use of the new standards.
4. NAHT Cymru understands that the new standards are intended to support further and ongoing professional learning throughout an individual’s teaching career. In bringing in the new standards, each individual would initially be able to use them as a baseline from which to identify and then undertake training focusing on individual, specific areas for development. The EWC Professional Learning Passport, for example, might be then used as an incrementally developing record of ongoing professional learning. The wording of this specific inquiry gives an impression that all existing teachers need to evidence that they have met all the standards by the date of their implementation – we believe that this is neither accurate nor desirable when aiming to encourage lifelong learning in the teaching and school leadership community.
5. One of the fundamental challenges facing professional learning for teachers in Wales, and indeed the wider scale of reform currently under way, has been the systematic reduction in the focus upon individual teacher development need as a result of continuous large-scale, sometimes poorly joined up, reforms.
6. NAHT Cymru believes many of the current reforms have potential to be excellent, but it is critical that we learn lessons from some of Wales’ previous good policy plans that have been implemented too quickly, without adequate resource or the necessary foundations being in place.
7. As a result of historical, large-scale, poorly co-ordinated reform as well as the funding challenges facing schools, there has been a pattern of sporadic continuous professional learning for staff, a loss of adequate training resources and a number of unintended consequences through external accountability.

8. In 2017, school leaders in Wales continue to face a level of education reform not seen in the Principality for well over 70 years.
9. Almost every major policy area impacting upon schools is affected, including:
  - Curriculum and assessment (Professor Graham Donaldson's 'Successful Futures');
  - New Wales-based qualifications - GCSE and A-levels;
  - Accountability changes – New Estyn Inspection framework and the welcome announcement for proposed changes to school performance measures;
  - Changes to Initial Teacher Education (Professor John Furlong's 'Teaching Tomorrow's Teachers');
  - Professional Learning – including establishing new National Academy for Educational Leadership;
  - Developing new professional teaching standards;
  - Devolution of Teachers' Pay and Conditions;
  - Additional Learning Needs and Education Tribunal (Wales) Bill – ALNET Bill.
10. It is no surprise, therefore, that the results of the recent EWC workforce survey suggested that almost 90% of teachers felt their workload was unmanageable.
11. In relation to the above, it should also be noted that the Devolution of Teachers' Pay and Conditions to Wales could place unnecessary pressure upon the implementation timetable for the new professional standards. However, we would urge caution, as a rushed implementation timetable could result in a loss of faith in the new standards before they have had an opportunity to fulfil their core purpose – raising further the quality of teaching and leadership in schools.
12. The reality for many schools, often the settings which would benefit most from consistent and intensive staff professional learning, is that external accountability causes too great a focus on specific, crude and generic pupil outcomes. The result can be a school which is encouraged to concentrate on short-term 'initiatives' in order to garner 'quick-wins' whilst neglecting potential fundamental issues within teaching and leadership. This can also reduce the available resource, funding, time and effort that could be potentially allocated to more constructive, sustainable and impactful professional learning for staff.
13. It also should be noted that the new standards should be used for career-long development, not as a tick list to work through and not as a punitive mechanism. Such a fundamental message cannot be left

until after their implementation and, therefore, pre-implementation messaging and the time to ensure all understand this is critical.

**Is there, or is there likely to be, enough support and training available to help teachers transition to the new standards?**

14. As already touched upon earlier in our evidence, the scale of reform in Wales is very significant. As a result, and with the timetable for implementing a number of major policies already under way, the capacity of the existing system is under pressure and current pathways for training delivery are likely to have reduced space for anything additional.
15. The requirements of the new curriculum and the ALNET Bill provide two clear examples. Neither can be put aside for a period of time and both have huge school-based training implications prior to their formal launch.
16. There is evidence to suggest schools, other settings and individual teachers / school leaders across Wales have experienced varying levels of training and information related to the two above, significant reforms. The regional consortia fulfil a crucial role in delivering information and training, particularly related to national reforms, but their resources too are under pressure.
17. For the new standards to be embedded effectively, a basic understanding of their functioning and operation is required prior to implementation and launch. This would require consistent national messaging for all those who would undertake delivery of this training – for example, challenge advisers, local authority officers, key Welsh government officials and Estyn – and then a subsequent process for delivering this common national message to all relevant school-based staff. It would need to be clear to schools, governing bodies and particularly school leaders, how the new standards assist the raft of reforms and are not in addition to them.
18. The challenge for the new professional standards, therefore, will be to achieve the desired impact as expressed within the principles and purposes, particularly in terms of professional learning, without further compromising an already overburdened workload.
19. It is unclear how Estyn might view the standards, or how reporting of a schools overall performance management against the standards might inform the judgements that Estyn make.
20. It is unclear whether a programme of funded engagement and training will be provided to support the new standards. NAHT Cymru is of the view that such a programme is vital for all teachers, accompanied by

training and evaluation for middle and senior leaders. Head teachers will require oversight of the new system within their school and opportunities to collaborate with others as the new system embeds.

21. As noted, measurement against the new standards is a refined process, not a matter of making 'perfunctory' judgements against a checklist. This implies a considerable responsibility for both teachers and managers in evaluating and reviewing an individual's practice, determining success, and identifying appropriate professional development opportunities for each individual. It's unclear what the workload implications of the system will be, but it may be assumed that there will be a need for a minimum number of opportunities for an individual and the line manager to meet over an annual cycle, with time required to both prepare for, and to summarise and record the outcomes of such meetings. NAHT Cymru is unclear as to how Welsh government intend to support these activities without adding further to existing workloads.
22. The use of mentoring is, of course, desirable. However, the availability of mentors and the workload implications are also unclear. NAHT Cymru wishes to be reassured that there is sufficient new funding to provide the capacity required for these essential activities.
23. A recurrent theme in our consultation response to the new standards was the need for the ambition of the new standards, and their commendably developmental approach, to be underpinned by real opportunities for training and development that have a tangible effect on, and are valued by, teachers and leaders. It is also critical that the operation of the new standards does not lead to any increase in workload for either senior leaders or their staff. Properly implemented and underpinned by effective, individual professional development, the standards have the potential to increase the opportunities for collaboration, reflection and evaluation that will, in turn, drive recruitment, improve retention and lead to system wide benefits for pupils. However, this will not be the case if the implementation of the new standards creates bureaucratic burden, and drives further increases in workload for an already frazzled workforce.
24. Currently far too few teachers have access to professional learning and development that meets their needs. If the approach to the new standards is to bear fruit, it must be underpinned by significant new funding, such that every teacher and leader is able to achieve their entitlement to the type of CPD that meets their individual needs. Clarification of the new funded commitment (originally cited in New Deal) from Welsh government is required to provide for teachers' professional development needs, and this must be delivered without an increase in workload.

25. As already cited, the most recent National Education Workforce Survey for Wales paints a bleak picture.

- 57.9% of school teachers indicated they had not used the existing 'Practising Teacher' standards or leadership standards in setting objectives, planning development or reviewing performance in the last 12 months.
- Cost was one of the main barriers/obstacles preventing respondents from accessing professional development.
- 13.9% of school teachers, felt that their development needs had not been met at all in the last 12 months.
- Full-time school teachers revealed that they regularly work an average of 50.7 hours during an average working week.

26. To have credibility and achieve engagement, the implantation of new standards must deal with these issues. Unless they can be addressed in the transition to the new standards, there is a risk of their failure even before they are implemented fully.

26. NAHT Cymru does not regard the timescale for implementation as manageable or realistic.

27. In order to provide the 'backdrop' to performance management conversations, senior and middle leaders and teachers need to be familiar with, understand and able to confidently operate the new teacher standards. Full sight of the standards and training is needed in advance of their introduction, and well in advance of them being used to focus and direct the content of performance management conversations. Given the complexity of the new system, time will be required for senior leaders and teachers to understand it and to operate it. A rushed implementation will compromise both the integrity of the standards and the credibility they will subsequently hold with the profession.

28. Clearly an implementation date of September 2017 is too soon, given that Welsh government did respond to the consultation until May 2017. NAHT Cymru are opposed to the proposed phased implementation; in our view this is a recipe for confusion that has the potential to substantially undermine the new system at its birth. Trying to operate a parallel system for NQTs, while maintaining existing systems for some staff, and perhaps making provision for those staff that might choose to opt-in to the new standards, will place unnecessary pressure and additional workload on school leaders. The potential for this hybrid system to confuse and complicate existing competency or disciplinary measures is also significant.

29. A timetable that would allow schools less than two months to prepare for such major changes is both unreasonable and unworkable; furthermore it shows scant regard for the workload and well-being of senior and middle leaders who will be charged with making the new standards work. Matters would be further complicated by the need for schools to undertake performance management activities during September and October to inform decisions about pay.
30. NAHT Cymru's strong view is that the new funding is required to support the arrangements. The success of the implementation of the new standards and the realisation of their aims is dependent on there being sufficient funding: for example, to support high quality, individually tailored CPD; to deliver opportunities for meaningful collaboration time within schools and across the wider system; and to provide the resources required to facilitate innovation. Within schools there will be a need to provide for more time for colleagues to meet and collaborate. Delivery of the vision will not happen without clearly signalling to teachers and senior leaders that it will be properly resourced – the proposals will founder if leaders and teachers are unsupported and under-resourced.
31. NAHT Cymru points to the existing lack of resource in the system. Current funding pressures are placing increasing strain on CPD budgets.
32. School leaders are concerned that their school Education Improvement Grants are woefully inadequate and many are being pressurised further in order to maintain staffing levels against the backdrop of school budget challenges.
33. There appears to be a general consensus that the quality of teaching and leadership is the key to a successful education system. If Wales is truly committed to investing in developing the best teaching and leadership required for our children and young people, it must be accepted that the current levels of resource in the system cannot achieve that admirable aim at present.

NAHT Cymru - September 2017