



**Department for Education
A world-class teaching profession
3 February 2015**

1. The NASUWT welcomes the opportunity to comment on the Department for Education (DfE) consultation on the development of a world-class teaching profession.
2. The NASUWT is the largest teachers' union in the UK.
3. The NASUWT's submission sets out important contextual considerations in relation to the implications of current Coalition Government policy for sustaining and enhancing teacher professionalism and gives the Union's views on the specific proposals described in the consultation document.

GENERAL COMMENTS

4. The NASUWT notes that the consultation document invites comments on plans by the DfE to enhance teacher professionalism by supporting the establishment and development of a College of Teaching and by promoting more effective professional development opportunities for teachers.
5. While the NASUWT's views on these specific proposals are set out elsewhere in this response, it is important to recognise that they cannot be evaluated meaningfully without consideration of the implications of broader

Coalition Government policy for teacher professionalism and the status of teaching.

6. The NASUWT is clear that children and young people learn best when teachers are given the time, resources and scope to make the fullest possible use of their professional talents, knowledge and expertise. An education system that does not give practical effect to this core guiding principle cannot expect to provide pupils with the full range of high-quality learning experiences to which they are entitled.¹ Respect for the professionalism of teachers is a hallmark of an education system that is genuinely committed to raising standards and extending educational opportunities for all children and young people.²
7. Governments must therefore demonstrate their commitment to teachers in words and deeds and by conferring professional rights on them which affirm their professional status and which are guaranteed across all public education settings.
8. Critically, public policy constituted on this basis will reflect an understanding of teaching as a complex, multifaceted professional activity which is, simultaneously, an art, a science and a craft. The art of teaching is about being responsive and creative and about developing intuitive capabilities. The science of teaching is about using research and other forms of evidence to inform decisions about how to teach. The craft of teaching is about mastering the full range of skills and practices needed by teachers to discharge their professional responsibilities effectively. The NASUWT believes that this broader vision of teaching is central to understanding its status as a profession.³ Conceptualisations of teacher professionalism that fail to reflect these considerations fully cannot be

¹ NASUWT (2013). *Maintaining World Class Schools*. NASUWT; Birmingham.

² ILO/UNESCO (1966). *The ILO/UNESCO Recommendation Concerning the Status of Teachers*. ILO/UNESCO; Geneva and Paris.

³ Pollard, A. (ed.) (2010). *Professionalism and Pedagogy: A contemporary opportunity*. Teaching and Learning Research Programme (TLRP); London.

regarded as a coherent and credible basis upon which to establish an effective national strategy for the teacher workforce.

9. This understanding of the nature of teacher professionalism invites reflection on the approach to teacher workforce policy adopted by the Coalition Government since taking office.
10. Specifically, in its White Paper on the teaching profession, *The Importance of Teaching*, published in November 2010, the Coalition Government confirmed its view that teaching is most appropriately regarded solely as a craft.⁴ In light of the understanding of teacher professionalism outlined above, this conceptualisation of teaching downplays to an unacceptable extent the broader dimensions of teacher professionalism through its implication that effective teaching depends only on the development and maintenance of secure subject knowledge and pedagogic skills developed through practical experience.
11. Evidence published by the Organisation for Economic Co-operation and Development (OECD) emphasises that other education systems regarded as high performing and fast improving base the development of teacher workforce policy on broader understandings of the nature of teacher professionalism than that advanced currently by the Coalition Government.⁵
12. It is therefore entirely unsurprising that this failure on the part of the Coalition Government to acknowledge the multi-dimensional nature of teaching has been associated with a policy agenda that has worked to undermine rather than promote teacher professionalism.
13. In particular, the permission granted to state-funded schools to engage teaching staff without Qualified Teacher Status (QTS), effectively

⁴ Department for Education (2010). *The Importance of Teaching*. TSO; London.

⁵ Organisation for Economic Co-operation and Development (2011). *Building a High Quality Teaching Profession: Lessons from Around the World*. OECD; Paris.

deregulating the teaching profession, and the introduction of revised standards for teachers, in which the professional rigour and breadth of the suite of professional standards they replaced are substantially absent, have all served to undermine the professional footing upon which teaching had been based previously. The negative implications of these policies have been compounded by the imposition on teachers of specific pedagogic methodologies, for example, the mandating of the use of systematic synthetic phonics in the teaching of early reading. This approach highlights the failure of the DfE to fulfil its core function of sustaining and enhancing the capacity of the education system to meet the needs of learners through policies that respect and promote teacher professionalism.

14. The NASUWT has articulated previously to the DfE its view that changes to the statutory framework of terms and conditions for teachers, including those related to their performance management, have undermined significantly prospects for maintaining teaching as a high-status, professional career option for graduates and for retaining and motivating the existing workforce. Specific issues in relation to performance management are addressed in further detail elsewhere in this response.

15. It is clear that these changes have not only led to significant increases in teacher workload but have also compromised the professionalism of teachers by increasing the extent to which they are obliged to undertake tasks that do not require the skills, talents and expertise of qualified teachers. It is evident that within many schools, teachers are no longer trusted to act as professionals and are required to comply with unwieldy and burdensome planning, assessment and record-keeping requirements, focused more on scrutiny of their work than supporting the progress and achievement of pupils.

16. It is therefore beyond dispute that core elements of Coalition Government policy are antithetical to a credible national strategy for maintaining and enhancing teacher professionalism. The fundamental nature of these

shortcomings in the Coalition Government's workforce-related policy programme serve to confirm that proposals to support the establishment of a College of Teaching or to enhance training and development offers for teachers, whatever the merits or otherwise of these proposals, will not of themselves address the risks to the professional status of teaching that this programme continues to create.

17. These considerations serve to highlight the NASUWT's view that the DfE must work with the Union and other relevant stakeholders to reassess its understanding of the nature and importance of teacher professionalism. This reassessment must involve consideration of the ways in which it is best reflected in key strands of national-level policy and a critical evaluation of the extent to which its current policy agenda requires revision to better promote and secure the professional status of teaching.

SPECIFIC COMMENTS

A College of Teaching

18. The NASUWT notes the DfE's view that the establishment of a College of Teaching would help to sustain and enhance teacher professionalism. The Union further notes that the DfE has set out proposals to support the development of such a body by providing start-up funding as well as other non-financial resources and exploring the potential for workforce-related functions currently undertaken by the DfE and the National College for Teaching and Leadership (NCTL) to be transferred to such a College.
19. The NASUWT has never objected in principle to the creation of a College of Teaching. However, in light of the concerns expressed in this response about the implications of Coalition Government policy for the professionalism of teachers, the Union is clear that the creation of such a College in current circumstances would be inappropriate. The Union's concerns in this regard are set out in further detail below.

Professional support for a College of Teaching

20. Any proposals to develop a College of Teaching must begin by establishing whether it could command broad support across the teaching profession. The Union notes in particular the outcomes of an independent survey of teacher and headteacher attitudes towards the creation of a College of Teachers undertaken for the Sutton Trust in May 2014. This survey confirmed a widespread lack of clarity across the teaching profession about the potential role and function of a College as well as a significant degree of scepticism about the extent to which it would be able to make an effective contribution to enhancing the professional status of teachers.⁶

21. It is therefore evident that there is, at present, no significant professional appetite for the creation of a College of Teaching. Establishing a College of Teaching in such circumstances would involve the imposition of a potentially powerful and influential body on the teaching profession without its support or consent. This would undermine the principle asserted consistently by advocates of a College that it could not operate successfully unless it was 'run for teachers, by teachers.'⁷

22. A College of Teaching established without the support of the substantial majority of teachers and school leaders would therefore have limited prospects of success and would serve to undermine rather than enhance public perceptions of the professional status of teaching. A College instituted without the consent of the greater part of the teaching profession could also render it liable to undue political interference or capture by unrepresentative interest groups and commercial organisations,

⁶ Sutton Trust (2014). 'Royal College of Teaching advocates still need to win over teachers.' (9 May). Available at: <http://www.suttontrust.com/newsarchive/royal-college-teaching-advocates-still-need-win-teachers-sutton-trust/>, accessed on 22/01/15.

⁷ Exley, S. (2014). 'College of Teaching dreams close to becoming reality'. *Times Educational Supplement*. (17 December). Available at: <https://www.tes.co.uk/article.aspx?storycode=6454238>, accessed on 22/01/15.

undermining the representativeness and impartiality required to sustain a plausible and worthwhile professional body for the teaching profession.

The concept of a College of Teaching

23. It is evident that the effectiveness of a College of Teaching depends critically on the establishment of a broad consensus about its aims and values as well as the functions it would be expected to fulfil. Without a clear and shared conceptualisation of a College across the teaching profession, such a body would not only be poorly placed to make a meaningful contribution to the work of teachers and school leaders, but could also diminish the public status of teaching relative to that of other professions.

24. It is for this reason that the NASUWT notes with concern the very different and sometimes conflicting notions among proponents of a College of Teaching about what it should be and what it should do. This concern is supported by evidence given to the 2013 House of Commons Education Select Committee Inquiry into a College of Teaching. For example, some of those giving evidence regarded a College as offering a safe space within which teachers could seek refuge from political interference. Others expressed the view that a College could be a means of establishing an alternative career structure for the profession. Some witnesses suggested that a College could play an important role in setting standards for teachers and discharging regulatory functions. Others saw it as playing a central role in bringing together subject associations and other representative groups. Some witnesses suggested that those with an interest in teaching, and not just practising teachers, might become members of a College of Teaching, while others asserted that the principle focus of the College should centre on the provision of continuing professional development (CPD) or providing a CPD quality kite mark.⁸

⁸ House of Commons, Uncorrected Transcript of Oral Evidence, *Great Teachers Follow-Up: College of Teaching*, Wednesday 17 July 2013.

25. A comparable range of different and often contradictory understandings about the concept of a College of Teaching was also evident in a compilation of essays on the subject, edited by Charlotte Leslie MP, published in 2013.⁹

26. It is therefore critical for the DfE to recognise in taking forward its policy work in this area that there is a serious risk of interpreting support for the idea of a College of Teaching as constituting support for the establishment of a particular type of organisation. In fact, it remains clear that there is no effective consensus among advocates of a College about its constitution, membership criteria or the strategic objectives that should guide its activities.

The relationship between a College of Teaching and school workforce unions

27. The role and remit of any College of Teaching would need to be very carefully defined in order to ensure that it would not undertake functions carried out by teacher unions and other representative organisations. Failure to do this would inevitably lead to resistance to a College across the teaching profession. It would also undermine co-operation and collaborative arrangements between a College of Teaching and other organisations. The unclear basis, referenced above, on which a College might be established risks the development of a body that would fail to take this important consideration into account.

28. In this context, it is important to note the views of the then Secretary of State for Education on the potential functions of a College set out in a speech given at a NCTL conference in April 2013. Set within highly derogatory and unjustified remarks about teacher unions, the former Secretary of State stated that a College of Teaching would represent a more positive form of representative organisation for teachers than trade

⁹ Leslie, C. (2013). *Towards a Royal College of Teaching: Raising the status of the profession*. Royal College of Surgeons in England; London.

unions and *'that the time is right for a new body to act as a voice for the whole teaching profession.'*¹⁰

29. Given the proposed provision by the DfE of direct support for the establishment of a College of Teaching and the fact that the former Secretary of State's comments have not yet been repudiated by the DfE, it is reasonable to conclude that the Coalition Government continues to view the development of a College as a means of undermining the legitimate role and function of teaching unions and that this aim has encouraged it to make start-up funding available for the creation of such a body.

Comparisons with medical colleges

30. The NASUWT recognises that some advocates of a College of Teaching have sought to draw comparisons between the role that it might play and that of medical colleges, such as the Royal College of Surgeons.¹¹ It is suggested that as the existence of medical colleges is associated with the relatively high professional status of surgeons, physicians and other clinicians, the creation of a College of Teaching would, of itself, assist in raising the professional status and standing of teachers.

31. However, this assertion fails to recognise that there are important distinctions between regulatory arrangements for teachers and those for surgeons. These distinctions, in fact, serve to highlight the profound difficulties that would confront attempts to establish an effective and coherent College of Teaching. For example, clinicians are required to register with the General Medical Council (GMC). Therefore, membership of medical colleges is restricted to those who are members of the GMC and comply with its regulatory requirements. Unless an individual is registered as a clinician with the GMC and adheres to its national practice standards, he or she cannot be accepted into membership of a medical

¹⁰ Speech to National College of Teaching and Leadership, 25 April 2013. Available at: www.gov.uk/government/speeches/michael-gove-speech-to-teachers-and-headteachers-at-the-national-college-for-teaching-and-leadership, accessed on 21/01/15.

¹¹ Leslie, C (2013). *op.cit.*

college. This provides an important professional underpinning to the colleges and thereby enhances their status and influence.

32. It should also be noted that medical colleges also operate in a context where the legitimacy and distinctiveness of the trade union functions, undertaken by the British Medical Association (BMA) on behalf of clinicians, are both recognised and respected by all stakeholder bodies, including medical colleges.

33. In relation to teaching, the current arrangements are very different. As noted above, teaching posts in state-funded schools can now be undertaken by staff without a professional teaching qualification. Also, the practice and conduct of all individuals in teaching roles across England is not regulated on a statutory basis. Given these circumstances and the stated intention of the DfE to undermine teacher trade unionism through the creation of a College of Teaching, it is therefore difficult to envisage how such a College could have a role and status comparable with that of medical colleges.

Eligibility for membership of a College of Teaching

34. It is important to note that little meaningful consideration has been given to date to the basis upon which eligibility for membership of the College of Teaching would be established in practice.

35. In particular, supporters of a College of Teaching emphasise that it should be developed as a body that is for teachers. However, in light of the removal of the requirement for teachers in state-funded schools to possess QTS, this creates considerable uncertainty about how this principle would be enacted in practice. If eligibility for membership is open to those without QTS, it would be entirely inconsistent with the medical college model advanced by the College's advocates in which formal professional qualifications are a prerequisite of admission and would, therefore, fail to secure the degree of professional recognition associated

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with membership of a medical college. However, limiting membership to those with QTS would exclude those without this status who are employed as teachers. This fundamental issue in relation to the way in which eligibility for membership of a College would be determined has yet to be addressed effectively in any proposals put forward to date. This serves to emphasise the NASUWT's position that until an effective framework for the statutory regulation of teachers is introduced, arrangements for determining membership eligibility for a College will be difficult to establish on a satisfactory basis.

36. In addition to these concerns, other important issues relating to membership eligibility remain unclear. For example, it has been suggested by some proponents of a College that membership should be extended to other staff in schools who deliver or support teaching and learning, such as Higher Level Teaching Assistants (HLTAs). Little attention has also been given in debates on the College of Teaching on whether headteachers and principals who do not have sustained and meaningful teaching commitments could be admitted to any body seeking to focus its activities on matters relating to pedagogy and teaching and learning.

37. It is therefore evident that the creation of a College in such circumstances would, at the very least, lead to significant ambiguities and inconsistencies in terms of the way in which eligibility for membership might be established. To proceed with the development of a College on this basis would therefore be inappropriate.

A voluntary membership model for a College of Teaching

38. As set out above, the NASUWT continues to insist that the establishment of a mandatory system of statutory regulation is an essential prerequisite to the development of a College of Teaching focused on supporting and developing the practice of teaching in a way comparable to that of medical colleges and other professional bodies. In such circumstances, it would not be appropriate to make membership of a College mandatory and the

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NASUWT notes that in the case of medicine, membership of a college is not, *per se*, a condition of employment as a clinician.

39. Instead, membership of medical colleges remains relatively high because of the attractiveness of the benefits of membership in terms of the support the colleges offer on providing access to training and professional development as well as opportunities to share professional practice. The work of medical colleges in terms of identifying and commissioning research to promote high-quality practice is also recognised widely.¹²
40. Medical colleges are therefore able to operate effectively on a voluntary basis because of the separate and mandatory arrangements that exist for the professional registration of clinicians through the GMC. It is therefore membership of the GMC, not of medical colleges, that confirms to employers, patients, Government and the wider public the professional effectiveness of clinicians. Medical colleges, therefore, as noted elsewhere, are able to act as a complement to the GMC, not as a substitute for it.
41. In relation to proposals for the establishment of a College of Teaching, the Union notes that some of the suggested models that have gained wider attention, such as that advocated by the PTI and others cited by the DfE in the consultation document, appear to be based on voluntary membership arrangements.
42. However, the imperative faced by any College to secure levels of membership sufficient to become self-funding in the longer term calls into legitimate question the extent to which voluntary membership models could be sustained in future. The NASUWT notes, for example, that the model for the College developed by the PTI suggests that it would require approximately 80,000 paying members to become financially sustainable. If the low levels of teacher support referenced elsewhere in this response

¹² *ibid.*

persist, it is unlikely that a strictly voluntary approach would secure this level of membership. In these circumstances, there is a genuine risk that those responsible for the leadership and management of a College would have little option but to seek to place pressure on teachers to become members.

43. The direct involvement of the DfE in the establishment of a College of Teaching leaves open the possibility that legal requirements could be introduced to compel membership of a College across much or all of the teaching profession. Specific issues with regard to the relationship between a College of Teaching and the DfE are addressed in further detail below.

44. However, even without the support of the legislative and regulatory powers of the DfE, there is a realistic prospect that persistent low levels of membership could encourage a College of Teaching to seek to establish agreements with employers of teachers in which membership of the College of Teaching would be a condition of continued or future employment as a teacher or school leader. Such arrangements would involve the College acting as a *de facto* regulatory body for these teachers as it would have the authority to withdraw membership from those individuals it regarded as failing to meet its practice standards and could thereby place their continued employment in jeopardy. This would be entirely unacceptable and would create significant opposition from teachers and would undermine the voluntary membership principle that proponents of a College insist is a necessary condition for it to function effectively.

Tiered membership models, fees and governance structures

45. The NASUWT notes that models for a College of Teaching identified by the DfE in the consultation document propose that it should operate on the basis of a tiered membership structure. For example, the PTI model is based on a three-tier membership structure, with a lower-level 'Associate

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Status' membership tier provided to persons not qualified to teach and an upper tier, 'Fellowship Status', available to *exceptional individuals who have made significant contributions to the profession.*' 'Intermediate Member Status' would be conferred on the generality of members who would need to have *'demonstrated breadth or skill and leadership either in the classroom or in school.'*¹³

46. Notwithstanding the concerns set out above about the ways in which those not qualified to teach might appropriately be integrated into a College of Teaching, the NASUWT has no objection in principle to the establishment of a tiered membership structure within an effectively constituted College. However, in current circumstances, it is difficult to envisage how progression through a tiered membership structure might be established in practice. In particular, most tiered membership models, such as those associated with medical colleges, rely on assessment for eligibility for entry to a particular tier being determined through a mentoring system in which a more experienced or qualified member of a college is released from their regular professional duties to work alongside a candidate for entry to the body or to a higher tier.

47. For many teachers, such a model would be inoperable in practice. Unlike clinicians and other professionals, teachers have no statutory entitlement to CPD and many continue to report significant difficulties in securing time within the working day to undertake professional development activities. It is therefore likely to be the case that many teachers would not be able to participate in the life of a College of Teaching in current circumstances or would only be able to do so in their own time after school, at weekends or during holidays. Arrangements for engagement with the activities of a College of Teaching undertaken on this basis would not only work against the stated commitment of the Secretary of State and other DfE Ministers to address excessive teacher workload but would also disadvantage those

¹³ Princes' Teaching Institute (2014). *A new member-driven College of Teaching: A blueprint*. Available at: <http://www.princes-ti.org.uk/view/document.shtml?u34377-ruvxyzs>, accessed on 26/01/15.

teachers, disproportionately women, unable to access professional development and training on this basis due to family or carer responsibilities that they are required to discharge in their personal time.

48. This dimension of the professional development context within which teachers work currently serves to emphasise the view expressed throughout this response that an effective College of Teaching cannot be established without prior action on the part of the DfE to adopt an approach to workforce-related policy that seeks to enhance the professional status of teachers. Specifically, this must include the provision of a contractual right to CPD and more effective entitlements to participate in training and development activities during the working day.

49. Issues of membership also invite reflection on the level of fees that a College of Teaching might levy on its members. The NASUWT believes that it is right that any such body should be financially self-supporting and that revenue should be derived primarily from membership fees. However, the Union notes that the financial modelling of a College undertaken to date suggests that such fees are likely to be significantly higher than those levied by, for example, the former General Teaching Council for England (GTCE), ranging between £75 and £130 per annum according to some estimates.¹⁴ However, unlike in the case of the GTCE, it is not proposed that teachers would be given augmented salaries to cover the costs of membership of a College of Teaching.

50. The NASUWT recognises that if membership of a College of Teaching were to be entirely voluntary, teachers should be free to decide whether the fees at the level described above would attract them into membership. However, given the risk identified elsewhere in this response that, for some teachers at least, membership of a College may not be voluntary, the imposition of fees on this scale emphasises concerns about the inappropriateness of establishing a College at this time.

¹⁴ *ibid.*

51. Financial considerations also serve to highlight issues relating to the way in which governance arrangements for a College of Teaching might be established. The models for a College cited by the DfE stress that it must be member-led. This suggests that the processes for decision-making within a College would be democratic and involve meaningful consultation with all members, regardless of their role or status. However, the fact that all of the current models for a College of Teaching recognise that it would not be able to subsist on member-derived funding alone until its membership had reached sustainable levels, confirms that some sources of external funding and support would be required during the College's start-up phase.
52. The DfE's proposal to provide this funding would create particular issues for any College of Teaching. These issues are addressed in further detail below. However, regardless of the source of this funding, it is reasonable to anticipate that conditions may well be applied to its use. In the event of tensions between the conditions or expectations of donors and the wishes of members, it is not clear how these might be resolved in ways that would not risk compromising the member-led status any College should seek to secure.
53. Those advocating the creation of a College have not clarified what criteria should be applied in determining whether a potential source of funding is appropriate or not. This could lead to circumstances in which a College's continued viability may depend exclusively upon sources of funding that might compel it to act in ways that would conflict with the views of its members or work against the wider professional interests of teachers. If funding for a College is derived from organisations with education-related commercial interests, it could face additional pressures to promote inappropriate intrusion of the private sector into the state education system.

Proposals for direct DfE support for the establishment of a College of Teaching

54. Notwithstanding the general issues detailed in this response in respect of the current barriers the establishment of a meaningful and effective College of Teaching would face, the DfE's proposal to provide financial and other start-up support to a College creates significant additional grounds for concern.

55. As noted above, the start-up costs associated with the development of a College of Teaching are likely to be considerable and could not be met by member-derived funding for a considerable period of time. The modelling commissioned by the PTI indicates that a College would require up to £30m of start-up funding over a ten year period.¹⁵

56. It is therefore incongruous for the DfE to fail to set out clearly in the consultation document the scale of the financial commitment it is proposing to undertake. Its assertions that its involvement in the development of a College would be limited to the short term cannot be regarded as credible.

57. Given the profound shortcomings in proposals to develop a College of Teaching, it is difficult to justify public expenditure on this scale. In a context within which public investment in the state education system remains severely constrained, it is evident that more effective uses could be found for the funding the DfE intends to direct towards the establishment of a College.

58. The NASUWT is also concerned for the implications DfE support for a College could have for its impartiality and independence. As noted above, dependence on external sources of funding would be likely to compromise the member-led status upon which any credible College of Teaching would

¹⁵ *ibid.*

need to be founded. There is a genuine risk that DfE funding of the College could lead to it being used as a means for advancing the policy interests of Government rather than enhancing the professional standing of teaching. The stated intention of the former Secretary of State to use a College of Teaching as a means of undermining the role of teacher trade unions must call into serious question the motivations of the DfE in seeking to provide funding for such a body.

59. The assertion by the DfE that it would be prepared to provide substantial public funding for a College without seeking to influence its work in any significant way fails the most basic tests of credulity.

60. In this context, the Union notes that proponents of the current models of a College of Teaching in the public domain have suggested that it should be created by use of a Royal Charter and should be established as a charitable company limited by guarantee. Nevertheless, it remains unclear how these forms of organisation would protect a College from undue political interference. For example, in normal circumstances, a body established on this basis with a wider membership would be subject to governance arrangements that would require the consent of members in relation to decisions about its structure and activities, including whether the organisation should continue to exist if it occurs to its members that its dissolution would be appropriate.

61. It is not evident how a College funded by the DfE to a significant extent would be at liberty to take such decisions. It is certainly possible to envisage circumstances in future in which despite significant start-up funding from the DfE, it becomes evident to its members that a College has no realistic prospects of achieving its stated aims and objectives and that it should cease operations. However, it would not be able to do so without writing off a potentially substantial amount of public money and it is therefore reasonable to anticipate that the Government would face significant pressure to intervene directly in the College to ensure that it continued to operate in an attempt to protect its investment. The Union is not clear how the proposed governance and ownership structures of any

of the current models for a College of Teaching would be able to prevent the Government from acting in this way, even if this intervention were to contravene the express wishes of members.

62. Concerns about the intention of the DfE to use the College of Teaching to advance its own agendas is confirmed by the proposal in the consultation document that key workforce-related functions of the DfE and the NCTL could be transferred to a College. The Union notes that the DfE's response to the Carter Review of Initial Teacher Training (ITT) suggests that these functions could include taking responsibility for revision of the Teachers' Standards, development of core content for teacher training programmes and dissemination of effective ITT practice.¹⁶

63. The NASUWT is clear that teachers, school leaders, members of the wider school workforce and their representative trade unions should have a central role to play in the development of national educational policy. However, in light of the serious concerns about the potential remit of a College of Teaching set out in this response and the risk that it would not be genuinely representative of the school workforce, the transfer by the DfE of core responsibilities of the state to such a body would be entirely unacceptable. In particular, it is clear that significant conflicts of interest would be likely to arise were this body to be dependent on funding from organisations with commercial interests in the education sector.

64. The implications of inappropriate governmental influence over a body established on a basis comparable to that of the proposed College of Teaching are highlighted in the case of the Ontario College of Teachers (OCT). The OCT has a remit to regulate the teaching profession in Ontario. This includes developing teacher standards and developing and

¹⁶ DfE (2015). *Government response to the Carter Review of initial teacher training (ITT)*. Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/396461/Carter_Review_Government_response_20150119.pdf, accessed on 26/01/15.

accrediting qualifications for membership of the College, including ITT programmes and teachers' CPD.

65. As with models for a College of Teaching for England, the OCT was established as a teacher-led body with a remit to enhance the professional standing of teaching.¹⁷ However, evidence indicates that the provincial government is influencing developments at the OCT that undermine teacher professionalism and directly attacks unions. In particular, the teacher standards developed by the OCT have evolved into a detailed set of competencies which are used for more punitive purposes. Also, while there was general opposition to a recent provincial government proposal to increase the length of teacher training from one to two years, the OCT is proceeding to establish a two-year training programme. Further, legislative changes have been introduced which mean that unions are not able to nominate representatives to sit on the OCT Council and that members of the Council must not have contact with unions.

66. The NASUWT is therefore profoundly concerned by the risk that a College of Teaching could similarly become liable to capture by the interests of Government, undermining its status as a genuinely independent and member-led body.

67. For these reasons, it is evident that the provision by the DfE of funding and other resources to support the establishment of a College of Teaching would be profoundly misguided in any circumstances and should not be pursued.

¹⁷ Ontario Federation of Teachers (OFT) (2014). *Course Correction: A Renewed Focus for the Ontario College of Teachers*. Available at: <http://www.otffeo.on.ca/en/wp-content/uploads/sites/2/2014/10/OCT-Paper-Course-Correction-Jan-2014.pdf>, accessed on 27/01/15.

Teachers' professional development

68. Alongside its plans in respect of a College of Teaching, the DfE has set out proposals to improve the ability of teachers to access professional development and training opportunities. The NASUWT notes that these proposals include establishing a fund to drive the delivery of the professional development for teachers, the introduction of an online platform for knowledge sharing, and the creation of a new Standard for Professional Development.
69. In principle, the Union recognises that supporting pedagogical research and the dissemination of good practice can play an important role in the provision of effective CPD for teachers and school leaders. In principle, it is possible to envisage the introduction of standards for teachers' professional development that contribute to improving the quality of CPD across the teaching profession.
70. Nevertheless, the Union notes the lack of detail in the consultation document on the ways in which it is intended that these proposals will be developed further. The DfE should therefore set out more clearly and thoroughly its intentions in these respects, to allow for more meaningful assessment by consultees of its proposals. No further development of these proposals should take place until additional details have been published and subjected to public consultation.
71. In developing its strategy in this area, the DfE should take full account of the negative implications of its policy agenda to date for professional training and development. In particular, changes implemented to arrangements for the performance management of teachers and the replacement of the previous suite of professional standards with the DfE's Teachers' Standards, introduced in September 2012, have undermined the opportunities available to teachers and school leaders to benefit from high-quality professional training and development.

72. As the NASUWT has emphasised consistently to the DfE, the arrangements for performance management in place prior to the introduction by the Coalition Government of the Education (School Teachers' Appraisal) (England) Regulations 2012, placed an unambiguous requirement on schools to consider the training and development needs of teachers. This statutory framework for performance management was supported by a progressive system of national professional standards that served as a backdrop to the appraisal process.

73. Teachers and school leaders were thereby provided with a means by which they could engage in informed, constructive and professional dialogue about their training and development that related directly to their pay and career aspirations, their reflections on their professional practice and interests, and the strategic teaching and learning-related priorities of their schools.

74. Evidence confirms that this approach to enhancing teachers' experience of professional development through effective performance management arrangements had begun to secure important improvements to CPD provision across the education system. Specifically, it is evident that this framework assisted schools in aligning the professional development needs of individual teachers with whole-school improvement planning, thereby delivering demonstrable benefits for pupils as well as the workforce.¹⁸

75. The removal of the key features of the performance management framework that promoted more effective approaches to CPD must therefore be regarded as a highly retrograde step. Combined with the ongoing refusal of the Coalition Government to provide teachers with a

¹⁸ Walker, M.; Jeffes, J.; Hart, R.; Lord, P. and Kinder, K. (2011). *Making the links between teachers' professional standards, induction, performance management and continuing professional development*. DfE Research Report DfE-RR075. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/182227/DFE-RR075.pdf, accessed on 26/01/15.

statutory and contractual entitlement to CPD, it is clear that these policies have led to serious constraints on the ability of teachers not only to access professional development opportunities but also to be involved actively in identifying their own CPD needs.¹⁹

76. In such circumstances, it is clear that Coalition Government policy has created significant barriers to ensuring that all teachers and school leaders are able to benefit from effective arrangements for the provision of CPD. The proposals set out by the DfE in the consultation document in this respect would fail to address these fundamental concerns.

77. Instead, it is evident that as part of the reformed approach to national teacher workforce policy advocated in this response, the DfE must work with the NASUWT and other relevant stakeholders to develop alternative approaches to professional development, teacher standards and support for the provision of consistently high-quality CPD in all schools. This revised approach should seek to ensure that CPD works more effectively to not only meet the legitimate professional needs and aspirations of teachers and school leaders, but also to support their ability to continue to provide high-quality learning experiences for all pupils.

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¹⁹ Teacher Development Trust (2014). *Annual Report*. Available at: <http://tdtrust.org/teacher-development-trust-annual-report-2014/>, accessed on 27/01/15.

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