

DfES Consultation: *Draft Further Education Teachers' Qualifications (England) Regulations*

UCET Response

1. UCET welcomes the opportunity to comment on the draft regulations on the qualifications for Further Education teachers.
2. The draft regulations do indeed seek to give effect to the proposals in *Equipping Our Teachers for the Future* and again in *Further Education: Raising Skills, Improving Life Chances* for the development of a fully qualified and professional workforce in the FE and Learning and Skills sector. The International evidence is clear that the effectiveness of educational provision depends pre-eminently on the quality of teachers, and the quality of teachers depends, in turn, on the establishment of properly resourced and nationally accredited initial professional preparation, systematic support and mentoring throughout induction and probation, and access to career-long continuing professional development, preferably within a framework that recognises and rewards accomplished performance as a teacher.
3. The draft regulations codify national arrangements for a professionalized teaching force: a basic initial qualification, the Preparing to Teach Award; the formalisation of Full and Associate teaching roles, with corresponding professional qualifications and formal recognition of professional status; transitional arrangements that take due account of the position of existing staff; and a flexible allowance of time within which staff, in the light of differing circumstances, can acquire the necessary qualifications.
4. In UCET's view the draft regulations for the most part possess the clarity that regulations require. There are, however, several areas where further changes are clearly required.
5. Firstly, the arrangements for the continuing professional development of FE teachers are inexplicably omitted from the regulations. Why, when the aim must surely be to reinforce the principle of professional progression in teaching, in which initial professional preparation, induction and CPD are envisaged as integral phases of a continuous process, is it considered appropriate to codify the national arrangements for CPD in separate regulations?
6. Secondly, there is an instance where the drafting has gone seriously awry. Regulation 3 (1) on Interpretation contains a definition of the process of professional formation. The simplest way of rescuing the grammar and the meaning here is to delete the word that at the end of the stem of the definition, to retain (a) as it stands, and to amend (b) to read the capability of meeting the occupational standards required of a teacher.
7. Thirdly, there are serious difficulties with regard to the definition of the associate teacher, as a person engaged in delivering a programme confined to a particular level or subject or type of learner. Such a definition would include a teacher whose teaching was confined to level 3, for example, or one who taught only one subject, or one who specialised in teaching students with disabilities. These are all cases of teachers who already perform the full teaching role and it would clearly be nonsensical to use a definition which would see them categorised as associate teachers. Furthermore, even when these difficulties are addressed, there would be a case for strengthening the distinction between full and associate teacher – a distinction we endorse – by including a form of words in the regulations, or possibly in any associated guidance, that exemplifies what duties the associate teacher will not be expected to undertake, if only to guard against the possibility that the regulations will be interpreted so flexibly as to allow an associate teacher to be employed instead of a fully qualified teacher.
8. Fourthly, UCET considers it quite inappropriate, and wholly incompatible with the aim of enhancing the quality of the teaching force and with the objectives set out in *Equipping our Teachers for the*

Future to permit a person to teach for as long as two years without having the basic 'preparing to teach' award.

9. Fifthly, UCET considers that the regulations and any accompanying documentation should encourage the view that QTS should not grant automatic access to teaching in the FE sector, just as we would not expect a person with QTLS to have an automatic entitlement to teach in schools. While there are significant commonalities between the two sectors, there are differences, and there is a need for those with a teaching qualification in the one sector to be able to transfer to teaching in the other, but only after further professional work has been undertaken. In that connection, there is a strong case, given that there are now two relevant professional bodies, to encourage these bodies to devise an agreed scheme of reciprocal recognition.

10. Finally, we are concerned about the treatment of professional formation. In the first place, that term is internationally used to refer to the whole process of professional preparation and development of a teacher, not a specific phase of that process. In the second place, we assume that professional formation can take place during, rather than after an in-service programme. Thirdly, and most importantly, UCET has strong reservations about dissociating QTLS from a programme of professional training.

11. In our view, QTLS should be awarded on successful completion of an SVUK- endorsed programme, and that stance can be justified on several grounds. To require the period of professional formation to be completed prior to the QTLS award will, firstly, add another perceived barrier to those contemplating entry to the profession, and might also dissuade Associate Teachers from enhancing their professional qualification. Secondly, it will make it difficult to market PGCE/Cert Ed courses if they cannot be described as 'QTLS award-bearing', again with implications for recruitment into the profession. Thirdly, it makes little sense for ITE programmes that adhere to the units of assessment (and so to the QTLS standards) not to confer QTLS: by definition, students successfully completing such courses must be awarded QTLS. Fourthly, the documentation from LLUK and DfES (most recently the published version of the QTLS standards) makes explicit references to 'courses leading to QTLS'. That form of words must mean that the courses themselves will lead directly to QTLS, and not only 'towards' or 'ultimately' to QTLS. These considerations lend force to the judgement of the HMI who has declared that to divorce QTLS from the ITE programmes is to devalue them.

12. We understand that the case for decoupling QTLS from the successful completion of an accredited programme is that the teacher must be able to demonstrate the application of the QTLS standards in a work-based setting. However, the successful completion of a programme based on the QTLS standards requires that the teacher demonstrates precisely that: competence in a work-based setting.

We suggest therefore that the following pattern, similar to that which operates with regard to teachers in schools, is to be preferred:

- Awarding QTLS on successful completion of the ITE programme, with possible deferral for a limited period until skills tests have been completed.
- Requirement relating to the successful completion of an induction period (assuming that this has not been done concurrently as part of the QTLS programme) before a full licence to practice is issued or full registration with IfL is granted.
- Requirement that teachers remain in good standing throughout their careers in order to retain QTLS or their licence to practice.

13. Not the least attractive feature of such an approach is that it diminishes rather than accentuates differences between teachers in schools and teachers in FE.

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