Statuary background and purpose of monitoring (page 5)

EWC monitoring responsibilities to ensure compliance could be a desk-based exercise. This would ensure that EWC was meeting its statutory obligations in full, while making the process manageable for ITE providers. A desk-based exercise should yield no less relevant information than face to face meetings, given that the focus is on compliance rather than quality.

Principles of the monitoring process (page 5-6)

References to *‘improvement’* and *‘quality’* would seem to imply an overlap with the Estyn remit. There could be a distinction to be drawn between EWC’s responsibility to ensure that programmes meet the accreditation criteria and Estyn’s duty to assess how well programmes are delivered. This distinction might helpfully be based on what each organisation is *required* to do under statute, and not on what regulation *allows* them to do in addition to this. A programme can be technically compliant and yet of questionable quality (and vice-versa, of course). This is not to say that programme requirements do not have any link to quality. They are of course intended to ensure that ITE programmes are of high quality. But the monitoring processes should be distinct, and the precise nature of this distinction should explained to providers. Should issues of compliance arise during Estyn inspections, these can be referred to the EWC for checking. Similarly, should EWC have concerns about quality these could be referred to Estyn. But the primary roles of each organisation are different. Without this, burdens on ITE providers will increase and lines of accountability will become confused. There will also be a danger that EWC and Estyn will have contrasting opinions on particular issues of compliance and quality.

References to *‘scrutiny’* and the like are reminiscent (albeit unintentionally) of old-style performativity style inspections rather than processes based on professional dialogue and collegiality, and with the very welcome and positive references in the document to things like *‘mutual trust’.*

We welcome the commitment to the sharing of information between EWC and Estyn in order to reduce burdens on providers. Agreed protocols should be published setting out exactly what information will be requested by each organisation, and a commitment given that one party will not duplicate information requests and will make use of any information collected by the other organisation that will meet its broad objectives, even if they would not necessarily have collected the information in precisely the same format. The sharing of information should take place *between* EWC and Estyn, and ITE providers notified in a timely fashion about what information is being shared.

EWC monitoring process (page 7)

Ensuring compliance with the *‘criteria for the accreditation of ITE programmes in Wales’* should be a paper-based exercise in order to minimise the burdens placed on ITE providers.

Membership of the mentoring committee (page 7)

While it is appropriate that ITE a representative of the ITE provider is represented on the Monitoring Committee, it should be recognised that this will have resource implications for providers, although these would of course be reduced if the process was paper-based. More than three-week’s notice of who this individual will be would be helpful. This should also be considered in the context of Estyn’s expectation that peer inspectors and staff from partnerships are released for 20-days a year. These expectations are unsustainable from the perspective of ITE partnerships.

Timeline for the monitoring process (page 8)

The production of distinct monitoring schedules for individual programmes, and the separate monitoring processes generally, would be very resource intensive fir ITE providers. There would also be the risk of overlap with Estyn schedules.

Preparing for a monitoring visit (page 9)

Two-day monitoring visits might not be required if processes are paper-based, although there may be a case for shorter and focussed meetings at the beginning and end of the process. The default position should be that these visits take place virtually rather than in HEI or school premises. Virtual meetings will reduce the burdens placed on HEIs and schools and will be at least as effective. The timing of the whole process should be sequenced with Estyn visits to minimise undue pressure on providers and reduce duplication.

Monitoring visit (pages 9-10)

The process (e.g. three meetings with partnership representatives, students etc.) is very similar to the Estyn process. They would be burdensome for both HEIs and schools. Clarification would be welcome on why such meetings are needed to check compliance, and what they would add to the Estyn visits. It is unclear why site visits to schools are needed to check compliance.

Outcomes (page 10)

The outcomes of the monitoring process could be just as well identified from a paper-based review of documentation. References to *‘further recommendations to support good practice’* imply a move beyond compliance checking into Estyn territory.

Relationship with other processes (page 11)

The duplication between EWC and Estyn functions is at the heart of our concerns. A single, coordinated, approach would reduce burdens and avoid the risk of EWC and Estyn arriving at contrasting and inconsistent judgements. The process for information sharing between EWC and Estyn appears bureaucratic and would in itself not appear to do anything to remove overlap or minimise the burdens to be placed on ITE providers.

Schedule for monitoring accredited programmes of ITE (page 12)

The proposed schedule would make it likely that EWC monitoring visits and 20-day Estyn inspections could take place in the same academic year. This might be unsustainable for ITE partnerships.

Information to be provided by partnerships (Annex A)

The requested data on student characteristics duplicates that is collected elsewhere. Neither does it relate to compliance against the accreditation criteria.