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## Consultation – summary of responses

### Proposals to revise the Education (Induction Arrangements for School Teachers) (Wales) Regulations 2005 (as amended)

Date of issue: July 2012

# Proposals to revise the Education (Induction Arrangements for School Teachers) (Wales) Regulations 2005 (as amended)

<b>Audience</b>	Newly qualified teachers; external mentors; school-based mentors; headteachers; appropriate bodies/local authorities; consortium coordinators; chairs of governors; independent schools; further education institutions; supply agencies; initial teacher training institutions; Estyn.
<b>Overview</b>	This document summarises the responses received to a consultation on the Welsh Government's proposals to revise the Education (Induction Arrangements for School Teachers) (Wales) Regulations in order to develop a robust, high-quality and nationally consistent approach to induction for all newly qualified teachers across Wales, and to provide greater flexibility in order to allow supply teachers to complete their induction period in Wales.
<b>Action required</b>	None – for information only.
<b>Further information</b>	School Standards and Delivery Division Department for Education and Skills Welsh Government Cathays Park Cardiff CF10 3NQ  e-mail: <a href="mailto:inductioninfo@wales.gsi.gov.uk">inductioninfo@wales.gsi.gov.uk</a>
<b>Additional copies</b>	Both this document and the consultation documents can be accessed on the Welsh Government's website at <a href="http://www.wales.gov.uk/consultations">www.wales.gov.uk/consultations</a>
<b>Related documents</b>	<i>Induction for newly qualified teachers in Wales (revised September 2012)</i> (2012)

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## **Introduction and overview**

The Welsh Government issued a consultation paper on proposals to revise the Education (Induction Arrangements for School Teachers) (Wales) (Amendment) Regulations 2012 in order to develop a robust, high quality and nationally consistent approach to induction for all newly qualified teachers across Wales, and to provide greater flexibility in order to allow supply teachers to complete their induction period in Wales.

The consultation was launched on 3 April 2012 and was open for responses until 29 May 2012. A total of 11 questions were set out in a pro-forma style document.

## The consultation process

Views were sought from stakeholder groups to inform the proposed policy changes. This report summarises the comments received during the public consultation process together with our response.

In total, 58 responses were received, several of which included very detailed suggestions for potential improvements to the draft regulations. The responses represented organisation groups as follows:

Schools and education providers	21
Teacher Unions	5
Local Government and national bodies	18
Individuals	14

A synopsis of the main points raised are outlined below, grouped by stakeholder response where possible, along with the Welsh Government response. A list of all respondents is provided in Annex A.

Some comments were outside the scope of the consultation, and although every effort was made to link these responses to the key themes of the consultation this was not always possible. However, the essence of all such comments has been fully considered.

The consultation document and response pro-forma adopted for this consultation can be found in the Education and Skills section (closed consultations) on the Welsh Government's website at:

<http://wales.gov.uk/consultations/education/inductionregulations/?lang=en>

We would like to take this opportunity to thank everyone who responded to the consultation for their contribution.

## Responses to the consultation questions and our response

Responses by Sector (%)		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9
Schools, ITT and Education Providers	Yes	21%	18%	17%	17%	29%	4%	24%	21%	10%
	No	7%	12%	12%	3%	0%	20%	2%	5%	7%
	DNA*	7%	7%	7%	16%	9%	10%	10%	10%	19%
Teacher Unions	Yes	9%	5%	7%	9%	7%	2%	9%	7%	7%
	No	0%	0%	0%	0%	0%	2%	0%	0%	0%
	DNA	0%	3%	2%	0%	2%	5%	0%	2%	2%
Local Government, National bodies	Yes	21%	7%	16%	22%	28%	14%	22%	26%	10%
	No	3%	14%	5%	0%	0%	9%	2%	0%	5%
	DNA	7%	10%	10%	9%	3%	9%	7%	5%	16%
Individuals	Yes	17%	10%	12%	12%	16%	9%	17%	14%	3%
	No	5%	10%	9%	3%	3%	12%	0%	5%	10%
	DNA	2%	4%	3%	9%	3%	4%	7%	5%	10%
Total	Yes	68%	40%	52%	60%	80%	29%	72%	68%	31%
	No	16%	36%	26%	7%	3%	43%	4%	10%	22%
	DNA	16%	24%	22%	33%	17%	28%	24%	22%	47%

\*DNA – did not answer yes or no

### Question 1

Do you agree that all periods of employment as a teacher after 1 September 2012 of at least one school session or more should be counted towards completion of the induction period?

#### General overview

68% Yes  
16% No  
16% DNA

Many respondents welcomed this proposal which they felt would help to address the difficulties posed by today's climate of unemployment and lessen the pressure on NQTs to complete suitable periods during the first five years.

Concern was expressed that it may be hard for short term supply teachers to gain the opportunity for professional development and support and for them to provide the evidence that they need to meet the standards.

## **Schools and education providers**

Comments included the following:

- Makes sense as it gives part time staff a mechanism for recognising their progress by allowing them to access induction and support.
- Concern this may result in a lack of continuity in induction of short-term supply teachers. Also that sessions of half a day would not offer full range of opportunities/experience to broaden skills, e.g. planning, evaluating, reflecting, etc., and make it harder to meet the practising teacher standards.
- The minimum period of employment to count towards induction should be longer than half a day.
- Counting all periods of employment of at least one school session is more equitable and addresses the variety of situations that NQTs encounter.
- Concern regarding the practicalities of administration and support/mentoring when a supply teacher may be undertaking a high number of short-term sessions.
- One respondent proposed that supply agencies could have a role in recording, monitoring and verifying sessions.

## **Teacher unions**

All unions were supportive of this proposal and felt that it would make it easier for newly qualified teachers to complete their induction in the current employment market and more able to access meaningful and long-term employment.

Comments included the following:

- Concerns regarding increased bureaucracy and assurances sought that any additional costs would not be met from existing budgets.
- The difficulty that short term supply teachers may have in meeting the standards because sessions were short and in different locations.

## **Local government and national bodies**

Comments included the following:

- This will help address the difficulties posed by today's climate of unemployment and lessen the pressure on NQTs to complete suitable periods during the first five years.
- It may be hard for short term supply teachers to gain the opportunity for professional development and support and for them to provide evidence that they met the standards.

- Fairer for all teachers as many currently work long periods of supply without a contract and are disadvantaged.
- The administration, tracking the periods of employment and managing the 10% non-contact time may be problematic.
- Will there be consistency of induction and access to training for short term supply teachers?
- Need to have an external mentor earlier than after 190 sessions.

## **Individuals**

Comments included the following:

- As an NQT I have struggled to get periods of employment long enough to complete my induction.
- Could be difficult for a supply teacher unless they were employed regularly at a school and can show evidence of planning and assessment to meet the NQT year standards.
- Supply teachers may not gather as much information/evidence as someone permanently employed by a school with induction programme and mentoring.
- Difficult to observe and monitor short term supply staff and provide consistent induction programme and mentoring.
- How will "Head teachers provide day-to-day support..."?
- May lead to reluctance to employ NQTs due to the input required from the school.

## **Welsh Government response**

We note that the majority of respondents support this proposal and recognise that guidance will need to address concerns raised about how it will operate in practice.

## **Question 2**

Do you agree that there should be no limit on when an induction period must be completed?

## **General overview**

40% Yes  
36% No  
24% DNA



A number of respondents felt that the proposed change would make it easier for NQTs to secure longer term employment, particularly given the difficult economic climate.

They also felt that it allowed NQTs to take career breaks for personal reasons such as starting a family or for caring responsibilities. Some respondents were concerned that a fragmented induction period could make it difficult for an NQT to demonstrate progression and to keep in touch with current developments.

### **Schools and education providers**

Comments included the following:

- Support for the proposal in that it recognised NQTs whose circumstances require them to take a career break.
- It was fairer for NQTs who experienced genuine difficulty in finding full time employment.
- Extended gaps may require some refresher training.
- Concern that it could take many years to accrue 380 sessions which may represent a disjointed induction experience.
- One respondent felt it was unrealistic to have no limit.

### **Teacher unions**

Teacher unions were broadly supportive of the proposal and recognised the benefits in securing more stable and longer term employment.

Comments included the following.

- Will help teachers who struggle to gain access to teaching sessions.
- The appropriate body should decide how relevant mitigating circumstances should be applied.
- An indefinite period may lead to a fragmented induction experience.

### **Local government and national bodies**

Comments included the following:

- Allows NQTs to suspend their induction to have a family or for health or caring responsibilities.
- Will ensure there is enough time for NQT to obtain the variety of experiences needed to satisfy the new requirements.

- The NQT needs to remain proactive in identifying professional development needs and maintain a portfolio of evidence.
- Significant gaps during induction period may cause the NQT to lose touch with current developments.
- Extended induction periods could lead to inconsistent mentoring arrangements.

## **Individuals**

Comments included the following:

- Supportive of proposal owing to personal difficulty experienced in finding employment
- If limit is too long, teachers may lose currency of knowledge.
- Refresher training could be provided to those whose induction extends over a long period of time.

## **Welsh Government response**

We have noted the comments both for and against the proposal. On balance we feel the advantages clearly outweigh the possible disadvantages which can be addressed through effective mentoring and through the support provided by schools and by the appropriate body.

## **Question 3**

Do you agree that the five-year limit on short-term supply teaching should be removed from the Regulations?

### **General overview**

52% Yes  
26% No  
22% DNA

There was widespread support for this proposal. Respondents felt it would help to provide the flexibility necessary in the current employment climate for NQTs to access permanent employment and avoid good teachers being lost from the system after five years.

Concerns were expressed regarding difficulties an NQT may have in demonstrating progress towards the practising teacher standards when education priorities and policies change over time.

There were also concerns about teachers who may not have taught for some time and the ability of NQTs to meet education priorities which evolve over time.

## **Schools and education providers**

Comments included the following:

- Need to remove the five-year limit while there are spending cuts and not enough full time employment.
- It should be reduced to three years with financial support from government.
- Short term supply work won't offer opportunity to develop the full range of skills and a proper induction period would be needed before securing a long term or permanent job.
- Agree – there are some very good short term supply teachers and this would allow them to continue to practice and further develop their teaching skills. WG could run workshops to develop and update NQT's knowledge and skills.
- A supply teacher could potentially work for many years to accrue the 380 school sessions which could affect standards.
- The limit should remain with opportunities to apply for an extension if needed.

## **Teacher unions**

Comments included the following:

- Five-year rule means good teachers may be lost from system.
- As teaching profession changes, so should flexibility of employment.
- Seeks to address the difficulty that many NQTs face in gaining access to stable employment during their induction.
- No real value to the five-year limit and extensions involved lots of administration.
- Removing the limit may lead to induction being unhelpfully 'piecemeal'.

## **Local government and national bodies**

Comments included the following:

- Agree – provided the NQT maintains a portfolio of evidence to demonstrate teaching experience, development and experiences.
- The use of experienced external mentors liaising with school mentors would greatly support this consistency.
- Competitive market will remove unsuccessful NQT from supply work by schools.

- A time limit should not be the deciding factor on whether a teacher is competent.
- An induction period should enable employers to terminate a contract on the grounds of conduct or capability.

## **Individuals**

Overall there was support for this proposal from individual respondents.

Comments included the following:

- I qualified in 2007 and still haven't completed my induction due to the difficulties in securing a position.
- The five year limit should remain; otherwise it may compromise the standard of the supply teacher being employed.
- Irrational that a teacher one month short of five years is suitable to teach but not suitable two months later.
- In some schools, short term supply is provided by TAs. Better to be taught by trained teacher.

## **Welsh Government response**

Given the diverse range of employment circumstances that affect supply teachers we recognise there may be some practical difficulties for some NQTs to experience a coherent and progressive induction period. We will work with partners and stakeholders to identify ways in which any such difficulties can be addressed.

## **Question 4**

Do you agree that the appropriate body should have overall responsibility for the support and training provided to newly qualified teachers during their induction period?

### **General overview**

60% Yes

7% No

33% DNA

Most respondents acknowledged that the appropriate body is best placed to ensure consistency of approach and quality of support across schools.

However, in practice, some respondents pointed out that schools would provide the support in collaboration with external mentors.

Some respondents had concerns about the capacity of LAs and consortia to carry out the role consistently and effectively.

Recruiting external mentors with the right skills and experience will be essential to enable the appropriate body to ensure high quality support and training.

### **Schools and education providers**

Comments included the following:

- Schools are better placed to set objectives for the NQT.
- It should be a joint responsibility – better balance of support between school and appropriate body.
- How will the appropriate body provide external mentors?
- Not all LAs are willing to act as an appropriate body for independent schools.
- Clarity needed about who the appropriate body is if NQT works across a number of schools in different LAs.
- Needs to be clear definition of roles and responsibilities to ensure 'wrap around support'.

### **Teacher unions**

Comments included the following:

- Appropriate body should be better positioned to support raising standards agenda.
- Current inconsistencies in school provision should not simply be replicated by appropriate bodies – needs to be visible improvement.
- Expect to see evidence of a reduction in workload for schools.
- Appropriate body needs to be able to support NQTs on short term placements.
- Concern about consistency of consortia arrangements.
- More detail needed on moderation processes - needs independent scrutiny.

### **Local government and national bodies**

Comments included the following:

- Proposals will give greater consistency to mentoring arrangements.
- Concerns about LAs/consortia having sufficient capacity to carry out role effectively and consistently – need robust QA arrangements.
- Schools need to share the responsibility for NQT development and be clear about their responsibilities.

- Consistency vital through external mentor support and information exchange.
- Importance of evidence provided to appropriate body by school and external mentor.
- Need to ensure external mentors are recruited with right skills and experience.
- Training provision needs to include supply teachers from the outset.

## **Individuals**

Comments included the following:

- Proposals would ensure consistent support and training.
- Need to ensure partnership between school, mentor and appropriate body is effective.
- No - schools are better placed to identify strengths and weaknesses.
- LAs may need additional resources to cope with this role.
- Supply agencies may have a role in co-ordinating information relating to supply teachers.

## **Welsh Government response**

Appropriate bodies will need to work closely with schools and external mentors to ensure that NQTs receive the appropriate support and training. Whilst the overall responsibility will rest with the appropriate body, in practice, the support will be provided by the school-based mentor and external mentor working in partnership.

## **Question 5**

Do you agree that schools should be required to provide newly qualified teachers with day-to-day support and work in collaboration with the appropriate body on the development of the newly qualified teacher's induction programme?

## **General overview**

80% Yes  
3% No  
17% DNA

There was strong support for this proposal which reflected the high value respondents placed on school-based support.

It is important to clearly set out roles and responsibilities of those providing support to the NQT and of how they should work together.

There is a need to promote consistency so that NQTs in different schools can expect a consistent level of support, including observation of practice.

### **Schools and education providers**

Comments included the following:

- The school should provide day-to-day support via the school-based mentor and work in collaboration with the external mentor assigned to that region or consortia.
- NQT should be assigned to the same external mentor for the duration of the induction period.
- Coaching provided by the external mentor seems to be focussed on assembling a hefty portfolio of evidence rather than the practicalities of teaching effectively in the classroom.
- Day-to-day support should not be too onerous for school, particularly where there may be several NQTs.
- Current funding arrangements should continue.
- Role of external mentor in working with the school should be clear.

### **Teacher unions**

Comments include the following.

- NUT expressed concern about the workload implications for headteachers.
- NASUWT supported the proposal but felt that it should be a transparent process.
- UCAC felt it reflected existing arrangements with the addition of working with the appropriate body.
- ATL were concerned about funding and the implications for NQTs on short term placements.

### **Local government and national bodies**

Comments include the following:

- Value of school-based mentoring – schools are best placed to provide this.
- Questions around the issue of resources – budgets of schools will need to be addressed.
- There is very little free time for head teachers to take the active role they would like within their schools and it is unreasonable to expect head teachers to undertake this day-to-day support and tailor specific induction programmes for NQTs.
- Nature of support and associated roles need to be clearly defined.

- Needs to be in a structured framework and funded appropriately.

## **Individuals**

Comments include the following:

- School-based support and mentoring valued by practitioners.
- NQT's working on short term supply don't receive any support.
- NQT's should be guided but also left to get on with the job. They should be observed and evaluated frequently.
- There should be monitoring in place to ensure schools fulfil their responsibilities.
- Considered to be impractical for those NQTs on short term supply.

## **Welsh Government response**

Guidance will set out the expected nature of day-to-day support including the roles and responsibilities of school-based mentors and external mentors who will work in close partnership to support the NQT.

## **Question 6**

Do you agree that the requirement for the headteacher to make a recommendation to the appropriate body at the end of the induction period should be removed from the Regulations?

## **General Overview**

29% Yes

43% No

28% DNA

Some respondents had interpreted the proposal as a removal in full of the head teacher's role from the induction process – the head teacher's continued involvement was strongly supported.

It was felt that there needed to be a strong and effective partnership between school, external mentor and appropriate body.

## **Schools and education providers**

Comments included the following:

- Support for retaining the headteacher's involvement.
- Should be a joint decision between the headteacher (via the school-based induction mentor) and the external mentor.



- Evidence to demonstrate practising teaching standards is gathered from all key stakeholders and this will include the head teacher.
- Introduction of external induction mentors would be positive. Recommendations from the school and external mentors would be considered by the LA when making the final decision.
- How to take account of more than one head teacher where NQT's induction takes place over several schools? However, the ultimate decision should rest with the appropriate body.

### **Teacher unions**

Comments included the following:

- Important to continue to take the headteacher's views into consideration.
- Need to be confident that LAs are able to make reliable and consistent judgements.
- Need to make sure there is also a role for school-based mentors/tutors to provide input into the process.
- Experience has shown head teacher's judgements can be inconsistent and lack objectivity.
- Could only support the removal of this requirement if it can be demonstrated that the local authority/consortium/external mentor have the expertise and credibility to make the appropriate judgements in relation to teacher induction.

### **Local government and national bodies**

Comments included the following:

- Will help to achieve greater consistency of judgements between schools.
- There needs to be clarity about the role of an external mentor and the link with the local authority.
- Head teacher's opinion is critical to the process - the head teacher and the external mentor should both provide recommendations.
- Some respondents felt the current arrangements should remain as the head teacher is accountable for the performance of staff in the school.
- Systems for the transfer of information from school to school and between the appropriate body and the school must be robust.
- The outcome of the induction period must be based on evidence provided by the NQT and endorsed by a range of stakeholders such as mentors, line managers, learners, parents and head teachers.

## **Individuals**

Comments included the following:

- Headteacher should be aware of the progress of their NQT through meetings with the induction mentor at the school.
- School input considered to be essential – otherwise progression criteria are flawed/incomplete.
- Final recommendation should come from the head teacher.
- If the proposals work effectively the appropriate body will be equipped with more evidence to support an informed decision.

## **Welsh Government response**

Under the proposed arrangements the head teacher continues to have a significant role in the assessment process through the provision of evidence from the school. In practice, the head teacher may choose to delegate activities to school-based mentors but will continue to work with the external mentor and appropriate body to ensure evidence-based judgements are made by the appropriate body.

## **Question 7**

Do you agree that headteachers should provide evidence at the end of the induction period (or at any point during the induction period if requested) to the appropriate body regarding a newly qualified teacher's progression against the practising teacher standards?

## **General Overview**

72% Yes  
4% No  
24% DNA

The majority of respondents agreed with the proposal and thought that the head teacher was well placed to provide strong evidence of the NQT's progress through induction.

## **Schools and education providers**

Comments included the following:

- Some respondents assumed the head teacher would be required to gather the evidence in person.
- There was potential for excessive reliance on the volume of paper records to gather evidence on each standard.

- It is also thought that it would be almost impossible to generate sufficient evidence of achieving all the standards if a teacher was doing induction by accumulating sessions of short-term supply in different schools.

### **Teacher unions**

All the teacher unions supported this proposal.

Comments included the following:

- Concerned about the need to minimise workload and avoid a bureaucratic process.
- There could be a workload issue if head teachers are required to provide evidence at any point during the induction period rather than just at the end.
- Head teachers have a role to play in the provision of such information, but it is clear that this should not be a simple tick-list set against the standards.

### **Local government and national bodies**

The proposal received strong support from respondents in this group.

Comments included the following:

- The evidence should include input from the mentor.
- This is generally a fair, sensible and practical approach of ensuring quality and support across the new requirements.
- Should be genuinely required and not a tick box activity.
- Information about the NQT's progress should be collected at regular intervals.
- The NQT should provide evidence at the end of the induction period. This direct approach allows the NQT to present their case to the appropriate body and there can be no concern around misrepresentation.
- One LA commented that they would not like to see the tracking of progress of an NQT being 'off-loaded' to an external agency.

### **Individuals**

Comments included the following:

- Felt to be a more objective means of assessing induction.
- There also needs to be a facility for asking for additional evidence if there is not sufficient or it is inconclusive.
- NQTs should also document and be able to explain how they have met the PTS during the year.

- LAs should do spot checks on schools to ensure mentoring is of high standard and to ensure NQTs are keeping an up-to-date file.
- Important for the NQT to also maintain a portfolio of evidence.
- Some practical difficulties in respect of short term supply teachers.

### **Welsh Government response**

Some respondents interpreted the question literally and assumed the head teacher would be solely responsible for information gathering. In practice these activities will be delegated and/or shared with other staff. The guidance will be clear that the appropriate body will take account of evidence provided by the school and the external mentor when reaching a judgement.

### **Question 8**

Do you agree that the appropriate body should make the final decision at the end of the induction period based on evidence, which includes that provided by the school and the external mentor?

### **General overview**

68% Yes  
10% No  
22% DNA

Whilst a minority of respondents felt that the head teacher should continue to make the decision there was strong support for the principle of school, external mentor and appropriate body working together to enable the appropriate body to reach sound, evidence-based judgements.

### **Schools and education providers**

Comments included the following:

- Some school-based respondents were concerned this may diminish the role in reaching a judgement and takes insufficient account of their involvement with the NQT.
- The role of the external mentor was questioned – needs more clarity.
- Most ITT providers agree that ideally it should be a joint decision by the LA and head teacher.
- There is concern that if a head teacher did not agree with the appropriate body's decision, then this is not in the best interests of the school, or the NQT.
- If the two parties do not agree, even after detailed discussions and joint lesson observations, then an extension to the induction period should be negotiated and a third party involved.

- Not all local authorities may act in the role of appropriate body for independent schools.

### **Teacher unions**

The majority of teacher unions supported the proposal.

Comments include the following:

- The NUT felt that the head teacher was best placed to make the judgement.
- Making the appropriate body responsible for final decision should provide objective assessment.
- Some concerns about capacity of LAs and consortia to carry out the role consistently.

### **Local government and national bodies**

No respondents in this category disagreed with the proposal – it was felt that the appropriate body could provide objectivity and consistency.

Comments included the following:

- This would strengthen the process and ensure that the school, the mentor and the appropriate body has a high level of understanding of the NQT's situation.
- Wider range of evidence forming final decision will provide greater consistency in assessment judgements.
- All involved need clear guidance about how to exemplify progress through the portfolio.
- Evidence from both the school and the external mentor should be considered when determining whether or not NQT has met the practicing teacher standards.
- Clear guidance needed for all involved to ensure NQTs are well supported and that the quality of the NQTs attaining induction is not compromised.
- Needs to be clear guidance so that consistency is achieved.
- Estyn felt it important that the appropriate bodies ensure good practice is shared between external mentors and schools.

### **Welsh Government response**

Guidance will set out the role of all those involved in induction, including school roles, the external mentor and the appropriate body. This will include how each party will work with the others to ensure the appropriate body arrives at a secure judgement based on evidence from the school and the external mentor.

## Question 9

Do you agree that teachers who qualified outside the EEA/Switzerland and who have successfully completed a period of professional experience comparable to a period of induction in the country in which they qualified should be exempt from the requirement to complete induction in Wales and assessment against the practising teacher standards?

### General overview

31% Yes  
22% No  
47% DNA

There needs to be a rigorous process to ensure compatibility between systems so that standard of induction being accepted from elsewhere is comparable with Wales.

There is support for common induction arrangements that reflects the distinctive cultural context of Wales.

### Schools and education providers

Comments included the following:

- It should be dependent on systems of induction in other countries being comparable with our own.
- Respondents from the independent sector felt that practitioners from overseas were being afforded preferential treatment to practitioners from Wales.
- All teachers should undergo induction that reflects the distinctive priorities and cultural identity of Wales.
- All teachers should be assessed against the same standards to ensure consistency.

### Teacher unions

Comments included the following:

- Proposal welcomed as it respects the equity and comparability of the qualifications achieved and experience gained by fully qualified teachers from outside the EEA/Switzerland.
- Dependent on appropriate checks in place to ensure comparability.
- Professional comparability would need to be established as it would depend on how closely their systems and standards match ours.
- All induction arrangements should reflect the cultural context of Wales.
- Needs to be clear about what counts as equivalent.

## **Local government and national bodies**

Comments included the following:

- Proposal supported as it will remain a requirement to gain QTS.
- Need to take account of the cultural context of Wales.
- How will assessment be carried out?
- Estyn felt that the process would need to be rigorous to ensure necessary evidence of skills, knowledge and understanding.
- The Welsh Independent Schools Council felt it unfairly discriminated against induction arrangements in independent schools.

## **Individuals**

Comments included the following.

- Different sets of standards from other countries was felt to be an issue.
- Also requirements need to be met to ensure the same high standards as other practitioners in Wales, for the ultimate benefit for children.
- Portfolio evidence or a formal induction could be the means of ensuring standards are maintained.

## **Welsh Government response**

The Welsh Government will work closely with the General teaching Council for Wales to determine the arrangements for recognising induction arrangements in other countries. The consultation responses will inform this work.

## **Question 10**

Included in this consultation is the statutory guidance that will support the revised induction regulations. This guidance aims to expand on the Regulations and provide the detail of how induction in Wales should be managed and delivered. If you have any comments about the draft guidance that you would like to be considered, please include these in this section.

## **General overview**

Several respondents commented on the guidance in relation to the recruitment, allocation and deployment of external mentors.

Some respondents felt that the guidance should address difficulties some supply teachers may have, particularly those on short term placements, in having access to support and opportunities to demonstrate they meet all the standards.

Further clarification was sought on detailed arrangements including extensions and managing unsatisfactory performance.

### **Schools and education providers**

Comments included the following:

- The guidance should include a more prominent role for schools in addressing unsatisfactory performance.
- The need for greater clarity over extensions and of the relationship between induction arrangements and participation in the Masters programme.
- Several respondents from the independent school sector expressed concern that the guidance unfairly constrained the ability of independent schools to offer induction.
- There could be confusion over the circumstances for extensions to the induction period.
- More clarity requested on relationship between induction and the Masters programme.

### **Teacher unions**

Comments included the following:

- Enhanced arrangements described in the guidance for supply teachers may serve as a disincentive to schools to employ short term supply teachers undergoing induction.
- The NASUWT requested clarification on the status of a NQT's Qualified Teacher Status if they failed their induction.
- More information was requested to be included in guidance on the moderation procedures.
- UCAC requested that the Welsh language version of the guidance was written in a more gender-neutral style.

### **Local government and national bodies**

Comments included the following:

- Guidance is clear but will need further information on collection of evidence.
- Guidance should cover arrangements to ensure collaboration across consortia.
- More information required on allocation of external mentors.
- Guidance should refer to training for school-based mentors.



- Roles and responsibilities in induction should be clearly set out.
- Strengthen guidance on procedures for addressing unsatisfactory performance.
- Capacity of LAs to support NQTs - already stretched.
- How can unattached NQTs access training?

## **Individuals**

Comments included the following:

- Guidance needed on arrangements for short term supply teachers to address risk of lack of support or opportunities for observation.
- Guidance needs to address the perceived risk of limited opportunities for supply teachers to engage in activities that assist them in providing evidence of meeting the standards.

## **Welsh Government response**

All the comments were considered and, where possible, reflected in amended guidance. The Welsh Government will work with partners and stakeholders to monitor implementation of revised arrangements and provide additional guidance if required.

## **Question 11**

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

## **General overview**

Responses covered a wide range of issues which are summarised by respondent group below.

## **Schools and education providers**

Comments included the following:

- Need to minimise workload for NQTs through gathering evidence for portfolios.
- Limited funding available for cpd activities.
- Funding arrangements unclear.
- Interim assessment at 190 sessions welcomed for supply teachers.
- Difficulties for independent schools in offering induction.
- Professional development opportunities for supply teachers.
- Clarity around induction roles and responsibilities for supply teachers.

- Induction in Further Education institutions not equitable with schools.

### **Teacher unions**

Comments included the following:

- Concern that revised arrangements are being introduced too quickly.
- Request that guidance on dismissal procedures is clarified in light of other related legislation.

### **Local government and national bodies**

Comments included the following:

- Preference for strengthening role of school-based mentors rather than introducing external mentors
- Clarity required around arrangements for NQTs already part way through induction
- Guidance requested on how to ensure NQTs receive entitlement of 10% non-contact time, particularly for supply teachers
- Independent schools concerned that not all local authorities are willing to act as an Appropriate Body for independent schools
- Monitoring important if NQTs to receive a consistent experience

### **Individuals**

Comments included the following:

- New induction arrangements welcomed for NQTs who have previously only been able to secure short term placements.
- Propose that a minimum of one term be served in the same school to support observation and progression.
- What action can be taken with schools who do not offer additional 10% release time and/or appropriate training.

### **Welsh Government response**

All comments have been carefully considered and, where appropriate, taken account of in amendments to the statutory guidance. No changes to the draft regulations were felt to be necessary.

## **Next steps**

The amended Regulations have been approved by the Minister for Education and Skills and were laid before the National Assembly for Wales on 28 June 2012. The Regulations are expected to come in to force on 1 September 2012.

We will strengthen the induction guidance for newly qualified teachers to address concerns raised in the consultation responses and to clarify the processes, roles and responsibilities required by the revised induction arrangements.

We will work closely with the General Teaching Council for Wales to determine the arrangements for recognising induction arrangements in other countries.

We will continue to liaise with partners and stakeholders to monitor implementation of the revised arrangements and provide additional guidance if required.

## **Annex: full list of respondents**

Respondents to the consultation:

Aberystwyth University  
Affinity Education Limited  
Agored Cymru  
ASCL Cymru/NAHT Cymru  
Association of Teachers and Lecturers Cymru  
Blessed Edward Jones Catholic High School  
Carmarthenshire LA  
Connahs Quay High School  
Cowbridge Comprehensive School  
Denbighshire LA  
Estyn  
Flintshire LA  
General Teaching Council for Scotland  
Governors Wales  
GTCW  
Gwilym Jones  
Jonathan Michael White  
Kings Monkton School  
NASUWT Cymru  
National Deaf Children's Society  
Neath Port Talbot College  
Newport School Governors  
NUT Cymru  
Open University in Wales  
Pembrokeshire LA  
Powys County Council, Schools Service  
South East Wales Centre for Teacher Education and Training  
St David's College, Conwy  
SWAMWAC  
Swansea LA  
Swansea Metropolitan University  
Torfaen  
Treffos Independent School  
UCAC  
UCET Cymru  
Welsh Independent Schools Council  
Welsh Language Commissioner  
Ysgol Heulfre

A total of 58 responses were received. 20 respondents requested that their responses be kept either confidential or were anonymous.