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Welsh Government
Consultation – summary of responses

Refresh of the Criteria for the accreditation of initial teacher education programmes in Wales

Teaching tomorrow's teachers

April 2023

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Overview

This is a report summarising the responses to a consultation seeking views on a refreshed version of the *Criteria for the accreditation of initial teacher education programmes in Wales* (the 'Criteria'). Under legislation to award Qualified Teacher Status all programmes of initial teacher education in Wales must be accredited against the Criteria. Qualified Teacher Status is a statutory requirement for working as a teacher in maintained settings in Wales.

Action required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Criteria for the accreditation of initial teacher education programmes in Wales (2018)

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Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [hyperlink](#)

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Initial teacher education with Qualified Teacher Status in Wales

The regulated profession of school teacher and the award of Qualified Teacher Status (QTS) in Wales is determined nationally and includes the legislative requirements pertaining to initial teacher education (ITE) that awards QTS. QTS is a statutory requirement for working as a school teacher in maintained settings in Wales.

To gain QTS via an ITE qualification, student teachers must meet a set of specified standards, and evidence their attainment over a sustained period. The QTS standards set out what ITE students must know, understand and what they should be able to do at the end of their ITE programme enabling QTS to be awarded. The legislation also requires ITE qualifications be accredited against specified criteria to award QTS.

Criteria for the accreditation of initial teacher education programmes in Wales

The *Criteria for the accreditation of initial teacher education programmes in Wales* (the “Criteria”) are part of the legislative requirements regarding school teachers’ qualifications and provide a high-level framework intended to assure the quality of ITE qualifications. This enables student teachers, and the education sector more broadly, to be confident that ITE qualifications are high quality, rigorous and professionally appropriate, preparing new teachers to enter the profession and continue their career-long commitment to professional learning.

Professor Furlong’s report ‘*Teaching Tomorrow’s Teachers*’ (2015) made recommendations to reform the ITE system in Wales with clear connections to Professor Donaldson’s report ‘*Successful Futures: Independent Review of Curriculum and Assessment Arrangements in Wales*’ (2015) setting out the vision for developing the teachers that would be needed in Wales to deliver the Welsh Government’s aspirations for education in Wales. The recommendations included entirely replacing the Criteria in place at that time (*Requirements for initial school teacher training courses at higher education institutions in Wales*, Welsh Government, 2013).

First published in 2017, the new *Criteria for accreditation of initial teacher education programmes in Wales* made clear the new requirements for ITE in Wales:

- A central role for schools
- A clearer role for universities
- Joint ownership of the ITE programme
- Structured opportunities to link school and university learning
- The centrality of research and other forms of systematic evidence

Why are we revising the Criteria for the Accreditation of Initial Teacher Education programmes in Wales?

All programmes of ITE with QTS in Wales from academic year 2019/20 have been accredited against the current Criteria document for a time limited period. The first accreditation period will soon be ending and ITE Partnerships will need to apply to the Education Workforce Council (EWC) in 2023 to reaccredit their provision to continue delivering ITE in Wales. Future programmes that have been successfully accredited will be in place from academic year 2024/25 for up to five years.

Much has changed in the Welsh education system since the publication of the current Criteria document; new legislation, Ministerial commitments, and research findings on the Welsh education and ITE system. The Welsh Government recognised the need to reflect on the changes and available evidence, alongside supporting the priorities of the education system following the impact of the Covid-19 pandemic.

The refresh of the Criteria and the consultation on the draft was undertaken to ensure Wales' ITE continues to support the education system by providing high quality provision for student teachers. The refreshed Criteria are intended to ensure both reaccredited and new ITE Programmes in Wales:

- reflect the maturing educational reforms in Wales, incorporating legislative changes and references to the most up to date guidance on related issues
- reflect the lessons learned from the previous accreditation process and accredited provision, to ensure the vision and implementation of ITE programmes is clear for all those involved in delivering and supporting ITE
- raise our ambitions and expectations for ITE programmes and Partnerships to support our ambition for world leading ITE in Wales.

The consultation process

The refreshed draft Criteria, subject to the consultation, were developed in collaboration with the ITE sector via a steering group. The group included representatives from ITE Partnerships - schools and Higher Education Institutions (HEIs), the Education Workforce Council (EWC), Estyn, and Professor Furlong. International ITE Experts also provided an expert outsiders view to deepen the discourse over the course of the project.

Over the summer term stakeholders were approached directly and invited to provide evidence regarding ITE in Wales as well as utilise their own stakeholder networks to invite others to freely participate. The responses received from all stakeholders were used to inform the discussions of the steering group and the refreshed draft Criteria.

Views on the draft Criteria were invited as part of a seven-week consultation which began 1 December 2022 and closed 19 January 2023. Initially the consultation was scheduled to close after a four-week period however, following feedback from stakeholders, this was extended with agreement from the ITE Partnerships and EWC (the timeframe to finalise the Criteria document impacts on the time to complete the accreditation process, directly affecting ITE Partnerships and the EWC).

The consultation contained questions relating to the draft Criteria document, along with standard questions on the Welsh language. This was published on the consultation pages of the Welsh Government's website. Respondents were able to submit their views and comments on paper, by email or online, in Welsh or English. The link to the consultation was emailed to a range of stakeholders, including those approached in the summer term 2022 and was publicised via the Welsh Government's 'Dysg' bulletin. The consultation applied to Wales only.

Who responded to the consultation

All the responses have been considered and analysed. The respondents represented both individuals and a range of interest groups including those directly involved in the delivery of ITE in Wales. A list of respondents other than those who requested anonymity is at Annex A.

Summary of responses

A total of 54 responses were received, 24 via the online form, 25 via email and 5 letters. 45 of the responses were submitted in English, 8 in Welsh and 1 response was fully bilingual.

The five letters provided feedback on the draft Criteria but did not use the provided consultation response form or address the questions directly. While the response details are included in the above summary and the breakdown provided below for question one where applicable, they are categorised as providing 'No response' from question two to question nine. Their responses are included under the summary for question ten.

Question one: About the respondent

Some respondents advised that they both do, and do not, work in or support the delivery of ITE in Wales. As such the data below does not correctly tally under further analysis.

Based on the information provided over three quarters of the responses were from organisations and just over half of all responses were from organisations or individuals working in or directly supporting the delivery of ITE in Wales.

The respondents that provided letters have been recorded as giving no response for parts i to iv. They have been included under part v of question one as all five letters were received from organisations.

Part i: Do you work in or support the delivery of initial teacher education?

Yes 52%
No 39%
No response 9%

We received 49 responses to this question.

Part ii: If Yes, in which type of setting/organisation do you work?

ITE partnership – HEI 25%
ITE partnership – primary school 14%
ITE partnership – secondary school 7%
ITE partnership – through school 0%
ITE partnership – special school 11%
Local authority 7%
Regional consortium 11%
Regulatory body (including inspectorates) 7%
Government 4%
Other 14%

We received 28 responses to this question.

Part iii: What is your primary role?

Accreditation monitoring official 4%
Induction/NQT support officer 14%
Inspector 4%
ITE partnership leader – HEI 18%
ITE partnership leader – lead partner school 7%
ITE partnership leader – partner school 0%
Other 36%
Teacher education/student teacher mentor – HEI-based 4%
Teacher educator/student teacher mentor – school-based 14%

We received 28 responses to this question.

Part iv: If you do not work in or support the delivery of ITE, in what capacity would you like to provide feedback?

Adult (not a parent or carer) 0%
Child or young person (under 18) 0%
Government 0%
Headteacher (not currently involved with an ITE partnership in Wales) 10%
Newly qualified teacher 0%
Other 40%
Parent/carer 0%
Professional associations including education workforce unions 35%
School teacher (not currently working as a teacher educator) 5%
Student teacher 0%
Student/academic 5%
Third sector 5%
Training provider 0%

We received 20 responses to this question.

Part v: Are you providing feedback on behalf of an organisation or group?

Yes 80%
No 19%
No response 2%

We received 53 responses to this question.

Question two: Engaging with the proposals

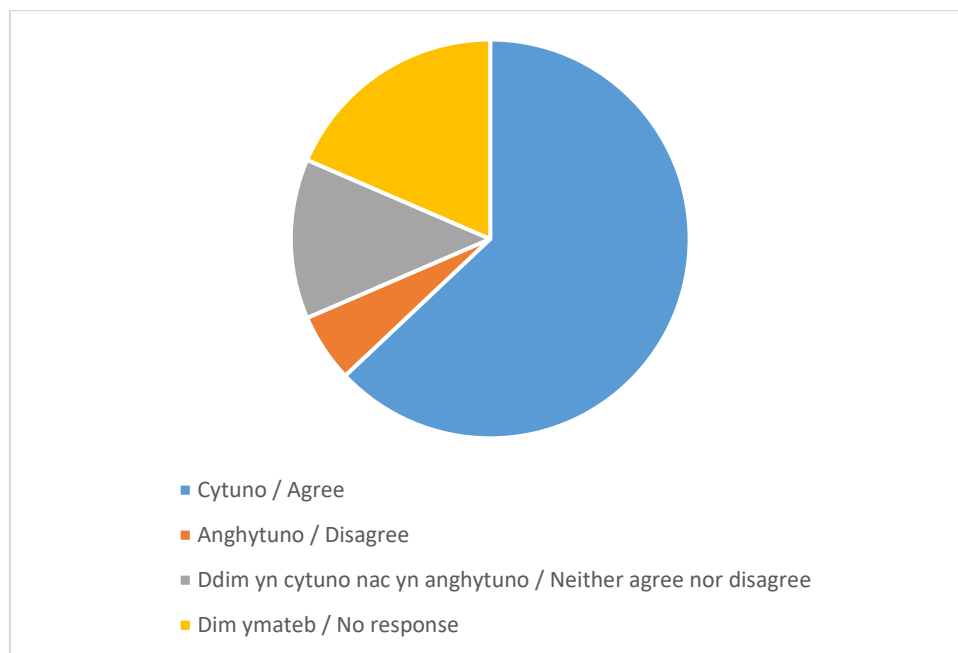
Have you read the 'Refresh of the Criteria for the accreditation of initial teacher education in Wales' consultation document?

Yes 91%
No 0%
No response 9%

We received 49 responses to this question.

Question three: A vision for initial teacher education in Wales

Do you agree that the amendments to 'Section A: A vision for initial teacher education in Wales' in the document make more explicit the vision for ITE in Wales and the intellectual thinking required to design and deliver ITE programmes?



Agree 63%
Disagree 6%
Neither agree nor disagree 13%
No response 19%

We received 44 responses to this question.

Summary Analysis

There was agreement at 63% (34 responses) to 'Section A: A vision for initial teacher education in Wales' in the draft document. This was the highest level of agreement across the consultation questions. There were a range of requests for further amendments across the spectrum of responses.

There was broad positivity on the amendments made, with respondents citing clarity of the content, its rationale, and the positive implications for ITE partnerships.

'We welcome the three dimensions into which Section A is divided. They make much more clear the vision for ITE in Wales and capture the thinking required to plan and deliver ITE. As the document states, it is important that ITE is seen as the beginning of the learning journey for qualified teachers rather than the single most significant stage of teacher development. The division of this learning journey into intellectual, practical, integrated and personal learning is important and rightly reflects international research findings.'

Welsh Government Advisory Group on Education Other than at School (EOTAS) in response to question three.

'Mae'r diwygiadau'n egluro'r cysyniadau deallusol sydd yn sail i'r weledigaeth ar gyfer AGA yng Nghymru. Mae yma gamau pendant sydd wedi eu esbonio'n eglur.'

'The reforms clarify the intellectual concepts behind the vision for ITEs in Wales. There are concrete steps that have been clearly explained.'

Anonymous respondent in response to question three.

Of those that responded to this question, three disagreed, citing three specific areas that had not been included in the 'vision'. These were Welsh language considerations, references to the climate emergency, and considerations around outdoor learning as a central pedagogy within Curriculum for Wales.

'NRW strongly advises that ITE programmes must include learning through teaching in, about and for the natural environment to embed and support understanding of how outdoor learning pedagogy supports the realisation of the Curriculum for Wales, whilst supporting new practitioners to develop their teaching skills around topics relating to the climate and nature emergencies.'

Natural Resources Wales in response to question three.

Seven respondents neither agreed nor disagreed. Of these, two respondents did not provide further information. Two of the respondents had duplicate responses. Of those that provided further information regarding their response, they:

- queried whether consideration had been given to develop arrangements that offer greater flexibility
- did not believe the vision was sufficiently ambitious or explicit, providing a list of inclusions for the curriculum of ITE
- queried the evidence base for ITE in Wales and the processes for ensuring that the evidence base utilised in programmes of ITE was contemporary and robust
- advised that the vision did not appear to align to the broader Welsh Government vision for education in Wales with specific regard to the Curriculum for Wales

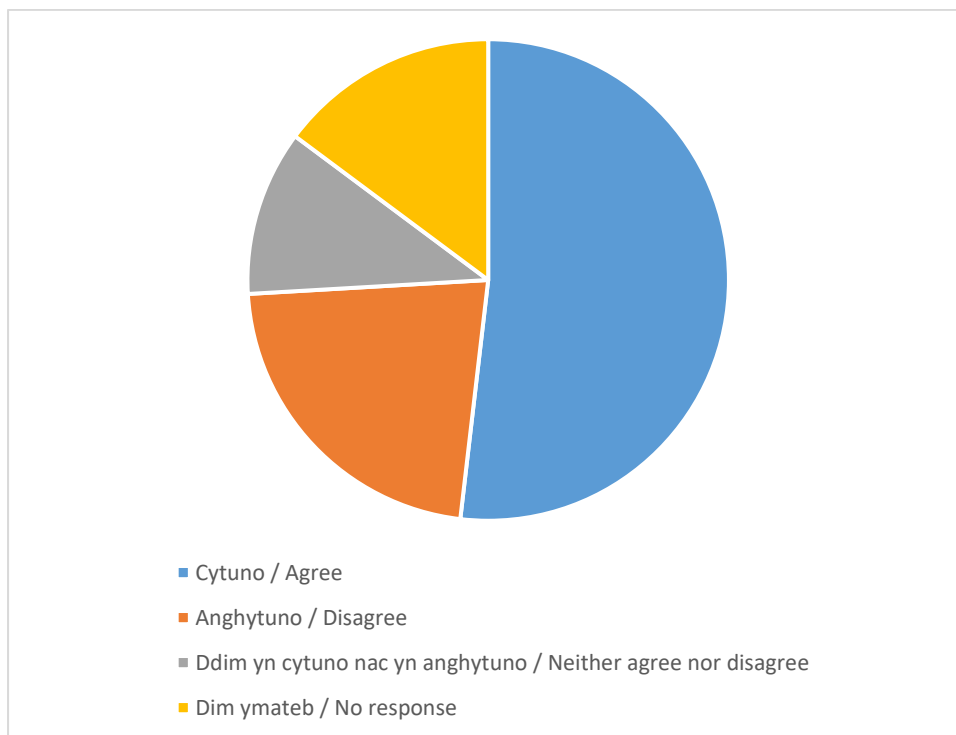
- expressed frustration that little recognition had been given to learners with additional learning needs educated outside of mainstream settings and queried how special schools and pupil referral units (PRUs) could participate in ITE

‘Positive that it has been recognised that teachers and schools are responsible for delivering the new curriculum in ways that are right for their particular learners, but this is then frustrating within a special school/PRU setting as there is little/no recognition given to the bespoke demands of developing a curriculum and assessment system for learners with ALN, which goes over and above the requirements in a mainstream school.’

South Wales Association of Special School Headteachers in response to question three.

Question four: Initial teacher education programme structures, processes and inputs

Do you agree that the amendments to ‘Section B: ITE programmes structures, processes, and inputs’ reflect the maturing educational reforms in Wales, make the requirements clearer, and further the quality requirements for ITE programmes in Wales?



Agree 52%

Disagree 22%

Neither agree nor disagree 11%

No response 15%

We received 46 responses to this question with 34 providing additional information.

Summary analysis

Over half of respondents agreed however this question also had the strongest level of disagreement and received the most additional comments across all the consultation questions, with the most requests for amendment. Suggestions for amendments came from respondents across the spectrum of agreement, intended to strengthen expectations, provide further clarity, and ensure specific aspects are covered and supported holistically across this section and the wider document. Some aspects of the responses from different organisations were identical. These responses came from organisations delivering ITE in partnership, or with shared specific remits or representative bodies.

Those that agreed with the draft Section B confirmed it was detailed, with clear consideration provided to all aspects of ITE delivery. Definitions, roles, responsibilities, and expectations for all partners in the system are provided with clarity and tied together with related national strategies.

Multiple respondents welcomed the additional inclusions explicitly noting subsection '4.1.1 The role of ITE in a research engaged profession', protected time for mentors, explicit inclusion of special schools and the references to specific Welsh Government priorities, guidance, and the increased expectations in some areas. The revised sections on the Curriculum, ALN, and wellbeing were also widely welcomed.

'It is very pleasing to see that students on mainstream programmes may undertake up to 20% of their school experience in a special school or ALN unit. This reflects maturing education reforms in Wales and will be very popular with all stakeholders, in terms of expanding provision, experience and opportunities to boost recruitment. The changes to the wording and content for programmes and modules is refreshing and reflects the language of curriculum reform and the Curriculum for Wales. Again, an explicit section on meeting the need of learners with ALN is welcome and reflects the priorities for education in Wales.'

University of South Wales ITE Partnership – HEI in response to question four.

Many of the 12 respondents that disagreed had duplicate or very similar responses. The majority highlighted the Minister for Education and Welsh Language contributions within a plenary debate regarding outdoor learning within Curriculum for Wales and made suggestions for amendments across Section B of the document (and throughout the document across their responses) to strengthen and support this aspect of the Curriculum and pedagogy.

Others that disagreed expressed strong feeling around the requirement that 20% of a student's clinical practice could be within a special school setting. Some requested that this be increased to 30%. Others argued this would remove special schools entirely from ITE in Wales and pointed to a challenging employment market for the recruitment of teachers into Special schools.

Requirements around student teachers' subject and pedagogical knowledge in a special school/PRU, are greater than in a mainstream context as the support required by each learner is

specific at an individual level; this reinforces that only allowing student teachers to spend 20% of their placements in special schools is far too low. Subject and pedagogical knowledge is a complex matter when working with children with ALN. It is inequitable and flawed that you can complete ITE in a mainstream school for 100% of the time and then be deemed to be equipped to teach within a special school/PRU setting as an NQT, yet it is perceived as too high risk to train for more than 20% of the time in a specialist setting and then be a mainstream teacher.

South Wales Association of Special School Headteachers in response to question four.

Multiple responses from across the spectrum of responses highlighted and queried why pupil referral units (PRUs) were excluded from the document. It should be noted that PRU's were raised by multiple respondents across many of the consultation questions.

The underpinning legislation pertaining to school teachers' qualifications and the award of QTS explicitly excludes PRUs from being utilised for student teacher's school experience. As such PRUs cannot be included within the Criteria document as settings able to participate in ITE in Wales.

Other comments received from those that disagreed with question four:

- advised that the Welsh in Education Workforce Plan should be referenced as a priority
- requested clarity on the Estyn Inspection process and EWC accreditation monitoring process
- requested more in relation to mental health and wellbeing within ITE and requested unspecified compliance measures to ensuring schools engaged with the framework on embedding a whole-school approach to emotional and mental well-being.

6 respondents neither agreed nor disagreed and had both positive and negative additional comments and made specific to wide-ranging suggestions for improvements. These broadly mirrored the comments from respondents both agreeing and disagreeing with this question.

Across all responses to question four there were contrasting comments and many questions pertaining to subsection '4.6 The Welsh Language'. While many of the respondents agreed with the aspirations and increased expectations many, especially those working in or supporting the delivery of initial teacher education (or induction), expressed strong disquiet at the reality of ITE delivery and the practicalities of the new requirements in this section. These concerns related to qualification content, staffing and resources. Many involved with ITE questioned what would be removed from the content of ITE programmes to accommodate the Welsh language requirements, making practical suggestions how the requirement could be realistically amended. Others strongly questioned the evidence base for the increased requirements and considered the amendment to be performative rather than supporting the development of student teachers' Welsh language skills.

However, many of the organisations with a specific interest in the Welsh language that responded did not consider that subsection 4.6 went far enough.

'The enhanced requirements for Welsh language development, whilst sound in its rationale, requires a much more intensive approach to the development of skills along a language continuum. However, this must be contextualised alongside the minimum standards expected of a beginner teacher and the dense, demanding curriculum within ITE which is delivered in a relatively short period of time.'

Anonymous ITE Partnership – HEI in response to question four.

'Nid ydym o'r farn bod y diwygiadau i Adran B (ac adran 4.6 yn benodol) yn adlewyrchu amcanion a thargedau'r Llywodraeth o safbwynt y Gymraeg ym myd addysg. Mae sicrhau gweithlu addysg cynyddol ddwyieithog yn gwbl greiddiol er mwyn cyflawni amcanion a thargedau Cymraeg 2050, ac mae gan AGA rôl gwbl allweddol yn y cyd destun hwn. Mae hyn yn wir o ran amcanion a thargedau'r Llywodraeth ar gyfer twf addysg cyfrwng Cymraeg, a hefyd o ran y disgwyliad y bydd defnydd llawer helaethach o'r Gymraeg mewn ysgolion cyfrwng Saesneg. Er bod y meini prawf diwygiedig yn gryfach 3na'r rhai presennol o safbwynt y Gymraeg, rydym o'r farn bod angen eu cryfhau ymhellach er mwyn adlewyrchu polisi Llywodraeth Cymru o safbwynt y Gymraeg ac addysg.'

'We do not consider that the amendments to Section B (and section 4.6 in particular) reflect the Government's objectives and targets on the Welsh language in education. Ensuring an increasingly bilingual education workforce is key to achieving the Cymraeg 2050 objectives and targets, and ITE has a crucial role in this context. This is true in terms of the Government's objectives and targets for the growth of Welsh-medium education, and in terms of the expectation that there will be much greater use of Welsh in English-medium schools. Although the revised criteria are stronger than the current criteria, we believe they need to be further strengthened if they are to reflect Welsh Government policy on education and the Welsh language.'

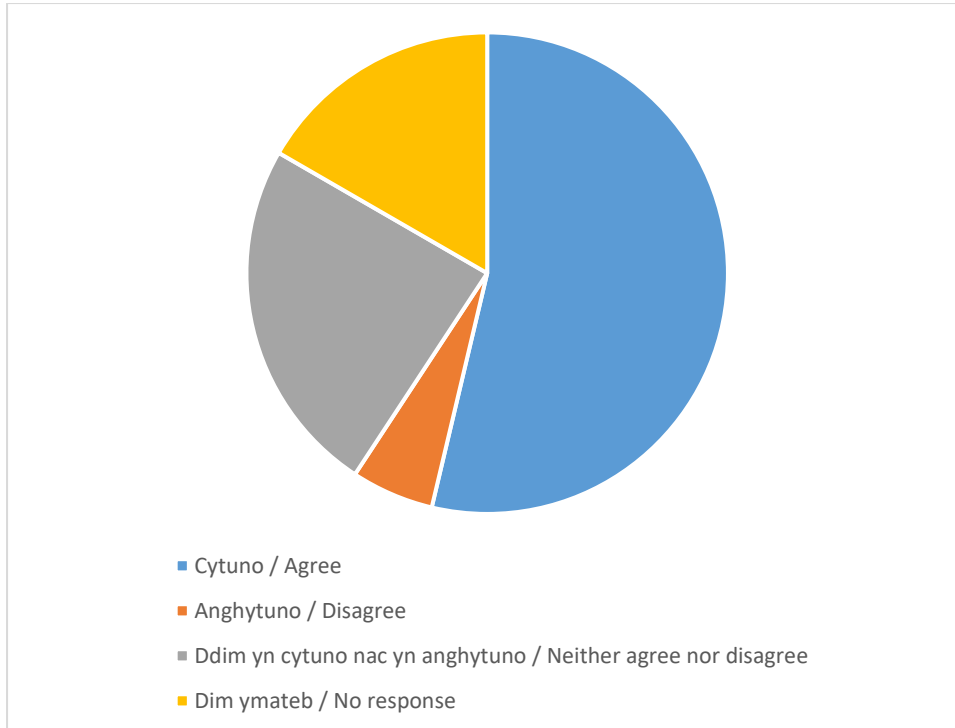
Welsh Language Commissioner in response to question four.

'We welcome the new requirement on Partnerships to 'be more strategic in their approach for the Welsh language within their own staffing and structures', as ITE clearly has a crucial role to play in supplying the future teacher workforce with the bilingual skills that Wales needs. However, we would caution that this new requirement on Partnerships does not have the unintended consequence of removing teachers with Welsh language skills from the school sector in order to fill posts in higher education.'

Qualifications Wales in response to question four.

Question five: Initial teacher education programme outcomes

Do you agree that the amendments to 'Section C: Programme outcomes' reflect the maturing educational reforms in Wales, make the requirements clearer and more explicit, and further the quality requirements for ITE in Wales?



Agree 54%
Disagree 6%
Neither agree nor disagree 24%
No response 17%

We received 45 responses to this question.

Summary analysis

This question received the most responses (13 respondents) that neither agreed nor disagreed. Most responses that provided further comments noted subsection 6.2 and welcomed the strengthened alignment and transition between ITE and Induction. Of those that disagreed with the question respondents repeated the views made previously. Other respondents noted the overcrowding of the ITE curriculum and the impact this may have on beginner teachers' progression through induction.

'The section on standards for induction (6.2) is helpful as it makes it explicit how ITE partnerships and those responsible for induction can work together to support student teachers in the transition from QTS to induction and beyond.'

University and Schools Council for the Education of Teachers Cymru (USCET) – in response to question five.

However, it is worth noting that, throughout the document, in the desire to reflect maturing education reforms, there have been a number of additions to the required content. In order to support NQTs to be reflective of their development, there is a need for student teachers to graduate with a mindset that they are able to engage in deep thinking. This requires time and space and the overburdened content outlined in sections B and appendix 3 can, at times, result in superficiality of understanding.

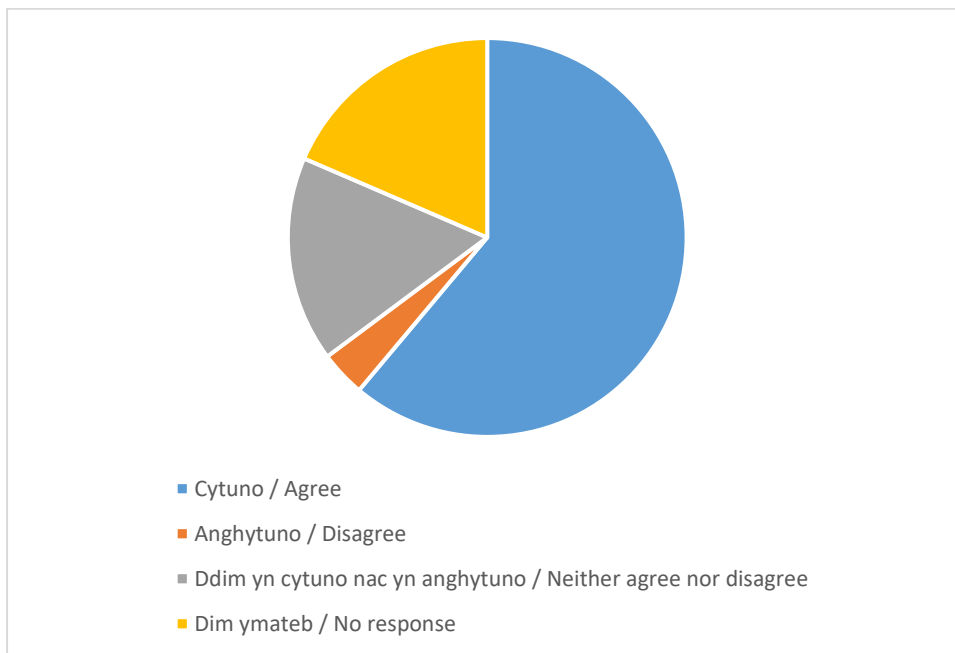
Central South Consortium in response to question five.

Question six: Supporting information

Do you agree that the amendments to the following sections:

- ‘Glossary’
- ‘References’
- ‘Appendix 2: Entry requirements for student teachers in Wales’
- ‘Appendix 3: Standards for Qualified Teacher Status – further advice for ITE partnerships in the design of programmes’

support the changes to the main body of the document?



Agree 61%

Disagree 4%

Neither agree nor disagree 17%

No response 19%

We received 44 responses to this question.

Summary analysis

This question had the joint (with question seven) highest no response rate at 19%, the lowest level of disagreement across the consultation and the second highest

level of agreement (question one was most agreed with by respondents). Additional comments welcomed the changes and amendments to the entry requirements. Suggestions and questions were raised in relation to technical detail across the various sections and requesting clarifying language and specific glossary definitions.

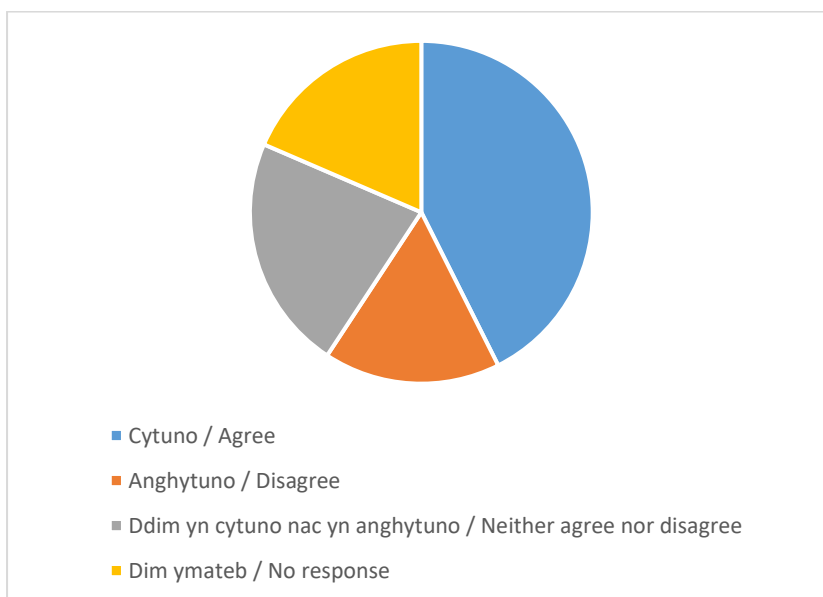
‘We welcome the changes to the entry requirements in particular. This will support workforce recruitment and retention particularly in border areas.’

Anonymous ITE Partnership – Other in response to question six.

Those that disagreed, or neither agreed nor disagreed, generally cited Appendix 1 being blank as a concern.

Question seven: Primary phase initial teacher education provision with an additional learning needs specialism

Do you agree that the inclusion of ‘Appendix 4: Specialist primary phase ITE provision for ALN’ clearly outlines Welsh Government’s aims to determine whether any changes are required in the Wales ITE framework to meet and support the requirements and aspirations of learners with the most complex additional learning needs?



Agree 43%
Disagree 17%
Neither agree nor disagree 22%
No response 19%

We received 44 responses to this question.

Summary analysis

This question had the joint (with question six) highest no response rate at 19% and the lowest number of respondents that agreed (23 respondents). Those that agreed with the question welcomed the inclusion of the appendix, however those more

closely involved with the delivery of education in schools and ITE programmes raised a number of questions around the technical detail and practicalities of delivery. More respondents that were involved with the delivery and support of ITE in Wales disagreed (9 respondents), or neither agreed nor disagreed (12 respondents), with question seven.

'Mae'n bwysig bod pawb sy'n cael ei hyfforddi i addysgu yn meddu ar y sgiliau i ymdopi ag anghenion arbennig disgyblion. Fodd bynnag, efallai fod rhai hyfforddeion yn dymuno arbenigo mewn addysgu disgyblion ag anghenion cymhleth. Mae'n hollbwysig fod gan ddysgwyr sydd â'r anghenion dysgu ychwanegol mwyaf cymhleth athrawon o'r radd flaenaf a fydd yn gallu cynnig y gorau posibl iddynt. Mae'r cynlluniau peilot a'r gwaith ymchwil a gynigir i'w weld yn mynd i'r afael â'r dyhead hwnnw a bydd yn ddiddorol gweld beth fydd deilliannau'r gwaith ymchwil a'r cynlluniau peilot.'

'It is important that everyone trained to teach has the skills to cope with pupils' special needs. However, some trainees may wish to specialise in teaching pupils with complex needs. It is vital that learners with the most complex additional learning needs have world-class teachers who will be able to offer them the best possible. The pilots and research proposed seem to address that aspiration and it will be interesting to see what the outcomes of the research and pilots will be.'

UCAC in response to question seven.

It is positive that it has been recognised that there is a need to take action about whether the ITE programmes for special schools/PRUs are offered and suitable, however a number of legacy generalisations and misconceptions remain.

South Wales Association of Special School Headteachers.

This section is very clear and helpful. There are however concerns around financial viability and sustainability due to reductions in allocations and also concerns about the application of the TPSM model generally, although these are not criteria-related.

USCET in response to question seven.

All except one respondent that disagreed provided further comment and the respondents expressed strong opinions. Two of the comments were duplicates. The respondents:

- felt that the application of the Teacher Planning and Supply Model to the special school sector was inappropriate due to the complexities of staffing special schools
- felt that teachers trained wholly in mainstream settings were inappropriate teachers for special schools and pointed to a lack of specialist ITE specific to the special school sector
- queried why the programmes would be a pilot in the first instance and raised questions around why the pilot would only be for primary age specialism

typically arguing that Curriculum for Wales was predicated on the concept of 'stage not age'

- queried the practicalities of an ALN specialism given the overcrowded ITE curriculum
- queried the requirement for a specific ALN specialism.

'To me it is illogical that the sector that needs the most specialism, the most upskilling and faces the most specific and complex set of teaching challenges is the one that has no dedicated route.'

No name provided - Headteacher (not currently involved with an ITE partnership in Wales) in response to question seven.

'The opening section of appendix 4 reads very reassuringly. I found it pleasing to see in writing that Welsh Government is committed to exploring our concerns and intent on making recommendations in order to address them. It was also satisfying to read that the special sectors continued involvement within Wales's ITE provision was deemed 'invaluable' in terms of preparing aspiring teachers for careers within both the mainstream and special sectors. However, beyond this section I do not feel that the proposed amendments are sufficient and are actually conflicting with the information outlined above.'

Anonymous ITE Partnership – Special School in response to question seven.

'Further thought is also required around programme content. The implication appears to be that any PGCE ALN programme must offer the entirety of an existing PGCE Primary plus all the additional specialist knowledge about ALN. This may not be realistic given the existing curriculum is already over-crowded.'

Anonymous ITE Partnership – HEI in response to question seven.

The majority of respondents that neither agreed nor disagreed did not provide additional comments however those that did asked detailed technical questions or requested that appropriate reference to the provision through the medium of Welsh were included.

Question eight: Effecting the Welsh language

We would like to know your views on the effects that the refreshed criteria would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

35 responses were provided to this question. We did not receive any comments that would suggest the proposals outlined in the consultation document would have any negative impact on the Welsh language.

Responses to question eight were generally positive on the changes made to the document in terms of the broader commitment to the Welsh language and tended to

include similar points made under question four. Many felt Welsh was clearly signalled as a priority, the requirements were clearer, and the impact would be positive.

Many responses made specific requests for amendment. Some of these comments noted the role ITE plays to enable other Welsh Government policies to achieve their aims such as those under Cymraeg 2050: Welsh language strategy and Welsh in education workforce plan. Several responses were duplicates and in the main contained the same detailed requests for amendments. Some requested that Welsh medium and bilingual education be considered more holistically across the document and that expectations under subsection 4.6 should be pushed further to increase the positive impact on the Welsh language. In contrast some respondents requested the criteria be amended to accommodate the practicalities of ITE and support student teachers.

A handful of respondents queried Welsh Government policy regarding the Welsh language entirely.

‘Mae 4.6 yn nodi disgwyliadau pendant ac o’u gweithredu’n llwyr fe fydd yn sicrhau na fydd y Gymraeg yn cael ei thrin yn llai ffafriol na’r Saesneg.’

‘4.6 sets out firm expectations and if implemented completely will ensure that Welsh is not treated less favourably than English.’

Anonymous Local Authority in response to question eight.

‘The Criteria are now clear in that it is the responsibility of any Partnership wishing to provide ITE in Wales, to ensure that Welsh medium provision is a core part of any programme.’

EWC in response to question eight.

‘We welcome the emphasis on the Welsh language and the stipulation of a number of hours. This is a positive step to address ‘2050 Miliwn o Siaradwyr Cymraeg’. The requirement for 35 hours per year is additional to the current provision and is significantly more than what is offered currently. No other requirement being removed to make space for this. We would argue that with the other additions to the refresh criteria, in an already crowded curriculum the collective addition could result in an unrealistic workload for student teachers.’

Anonymous ITE Partnership – HEI in response to question eight.

‘Fel cyfanwaith nid yw’r ddogfen yn adlewyrchu polisi a thargedau Llywodraeth Cymru ar addysg drwy gyfrwng y Gymraeg yn ddigonol, nac ychwaith rôl allweddol gweithlu addysg ddwyieithog er mwyn cyflawni hyn.’

‘As a whole, the document does not adequately reflect Welsh Government policy and targets, nor do they adequately reflect the

fundamental importance of an increasingly bilingual education workforce in achieving this vision.'

Comisiynydd y Gymraeg in response to question 8.

'Yn gyffredinol, mae'r meini prawf achredu diwygiedig yn cynnwys rhywfaint o gynnydd o ran y Gymraeg, ond yn sylfaenol, mae'n ymddangos fod y Gymraeg (neu ofynion penodol ychwanegol) wedi eu mewnosod mewn manau penodol, heb ystyried y ddogfen fel cyfanwaith. Byddai modd golygu'r ddogfen mewn dull mwy cydlynus er mwyn sicrhau bod disgwyliadau'r Llywodraeth o ran y Gymraeg yn treiddio trwy'r ddogfen gyfan.'

'The revised accreditation criteria generally include some progress in terms of Welsh, but fundamentally, it appears that the Welsh language (or additional specific requirements) have been inserted in specific places, without regard to the document as a whole. It would be possible to edit the document in a more coherent manner to ensure that the Government's expectations regarding the Welsh language permeate the whole document.'

Coleg Cymraeg Cenedlaethol in response to question eight.

Question nine: Improving the Welsh language

Please also explain how you believe the proposed criteria could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

24 responses were provided to this question.

Some of the responses were duplicates and across the spectrum of responses many suggested amendments across the whole document to better support the requirements under section 4.6. Many of these suggestions involved expanding and improving the role of schools within ITE Partnerships, and school staff and their professional development, to further support the Welsh language and its development and use within ITE programmes.

Those that felt the requirements did not go far enough to support the Welsh language made requests for amendments that typically involved increasing monitoring, accountability, and compliance arrangements, making these new arrangements and their outcomes more public than at present. Many of these respondents also requested that recruitment allocations become mandatory and accredited status be removed where not achieved.

'Barn CYDAG yw nad yw'r trefniadau monitro ac atebolrwydd presennol yn ddigon cadarn i ddarparu sicrwydd bod y meini prawf yn ymwneud â'r Gymraeg yn cael eu gweithredu'n gyson ac yn effeithiol ar draws y partneriaethau. Yr ydym o'r farn felly bod angen

creu fframwaith gadarnach i sicrhau fod y meini prawf sy'n ymwneud â'r Gymraeg yn cael eu gweithredu.'

'CYDAG's view is that the current monitoring and accountability arrangements are not robust enough to provide assurance that the criteria relating to the Welsh language are being implemented consistently and effectively across the partnerships. We therefore believe that a stronger framework needs to be created to ensure that the criteria relating to the Welsh language are implemented.'

CYDAG in response to question nine.

'The proposal offers enough time and commitment to the coverage of the Welsh language skills for trainee teachers - it is the staff working with them who need more training.'

No name provided - ITE Partnership leader – lead partner school in response to question nine.

Question ten: Related issues

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.

24 respondents provided additional information on related issues not specifically addressed. This includes five respondents that provided a letter with their feedback.

Many of the comments reemphasised previously points made, provided further suggests for amendments, or provided feedback on ITE in Wales generally. These included:

- the increased expectations around the Welsh language
- the role of PRUs in ITE
- special schools in ITE, the inclusion of Appendix four and employment based alternative ITE provision for these schools
- supporting student teachers wishing to teach in maintained religious schools
- requests for specific inclusions to the ITE curriculum
- overcrowding of the ITE curriculum
- managing failing ITE students.

Some of the comments requested further clarity and guidance on specific aspects of the draft Criteria including:

- entry requirements
- student teacher school experience and clinical practise.

'We genuinely welcome the revised criteria and appreciate the spirit of collaboration in which they have been generated.'

CaBan Bangor ITE Partnership in response to question ten.

'NEU Cymru believe that the current university-based model of ITE is the most effective way of training the teachers of tomorrow as it

incorporates the need for student teachers to engage in wider reading and demonstrate an increasingly confident understanding of theory and research relevant to their day-to-day practice, as well as giving them practical experience of day-to-day life in a school environment where they plan, prepare, teach, and assess pupils, and reflect on their practice. ITE should always be based on learning that is both rigorously practical and intellectually challenging at the same time.'

NEU Cymru in response to question ten.

Next Steps

Your views are important to inform decisions about the *Criteria for the Accreditation of initial teacher education in Wales*. Each response will be considered carefully by Welsh Government with the support of the steering group to inform the final version of the Criteria document.

Annex A – List of respondents

Aberystwyth University ITE Partnership
ASCL Cymru
Association of Educational Psychologists
Association of heads of outdoor education centres
CaBan Bangor ITE Partnership
Catholic Education Service
Central South Consortium
Coleg Cymraeg Cenedlaethol
Comisiynydd y Gymraeg
Cymdeithas yr Iaith
Cymdeithas Ysgolion dros Addysg Gymraeg (CYDAG)
Denbighshire and Conwy Council
Dyfodol i'r Iaith
EAS
Estyn
EWC
Grŵp Gweithredu Allanol - Gweithlu'r Gymraeg mewn Addysg
Headteacher (not currently involved with an ITE partnership in Wales)
ITE partnership leader – lead partner school
ITE partnership - special school
Joint Strategic Group for Youth Work in Wales
NAHT Cymru
NASUWT Cymru
Natural Resources Wales
NEU Cymru
Qualifications Wales
School teacher (not currently working as a teacher educator)
South Wales Association of Special School Headteachers (SWASSH)
UCAC (Undeb Cenedlaethol Athrawon Cymru)
University and Schools Council for the Education of Teachers Cymru (USCET)
University of South Wales ITE Partnership

UWTSD
Wales Council for Outdoor Learning
Welsh Government Advisory Group on Education Other than at School (EOTAS)

21 respondents requested anonymity.