

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

Consultation response form

Your name: Hywel Iorwerth

Organisation (if applicable): Welsh Language Commissioner

email/telephone number: hywel.iorwerth@cyg-wlc.cymru

Your address:

Responses should be returned by **19 January 2023** to:

Initial Teacher Education Branch
Pedagogy, Leadership and Professional Learning Division
The Education Directorate
Education, Social Justice and Welsh Language
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and sent to: ITEducationAddysgGA@gov.wales

Question 1

- i) Do you work in or support the delivery of initial teacher education (ITE)?
(If no continue to iv.)

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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- ii) If Yes, in which type of setting/organisation do you work?

ITE partnership – HEI	<input type="checkbox"/>	Local authority	<input type="checkbox"/>
ITE partnership – primary school	<input type="checkbox"/>	Regional consortium	<input type="checkbox"/>
ITE partnership – secondary school	<input type="checkbox"/>	Regulatory body (including inspectorates)	<input type="checkbox"/>
ITE partnership – through school	<input type="checkbox"/>	Government	<input type="checkbox"/>
ITE partnership – special school	<input type="checkbox"/>	Other (please specify)	<input type="checkbox"/>

- iii) What is your primary role?

Teacher education/student teacher mentor – HEI-based	<input type="checkbox"/>	Induction/NQT support officer	<input type="checkbox"/>
Teacher educator/student teacher mentor – school-based	<input type="checkbox"/>	Inspector	<input type="checkbox"/>
ITE partnership leader – HEI	<input type="checkbox"/>	Accreditation monitoring official	<input type="checkbox"/>
ITE partnership leader – lead partner school	<input type="checkbox"/>	ITE partnership leader – partner school	<input type="checkbox"/>
Other (please specify)	<input type="checkbox"/>		<input type="checkbox"/>

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

Parent/carer	<input type="checkbox"/>	Professional associations including education workforce unions	<input type="checkbox"/>
Child or young person (under 18)	<input type="checkbox"/>	Third sector	<input type="checkbox"/>
Adult (not a parent or carer)	<input type="checkbox"/>	Training provider	<input type="checkbox"/>
Student teacher	<input type="checkbox"/>	Government	<input type="checkbox"/>
Newly qualified teacher	<input type="checkbox"/>	Student/academic	<input type="checkbox"/>

School teacher (not currently working as a teacher educator)	<input type="checkbox"/>	Headteacher (not currently involved with an ITE partnership in Wales)	<input type="checkbox"/>
Other (please specify)	✓	Welsh Language Commissioner	

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

Yes	✓	No	<input type="checkbox"/>
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If 'yes', please specify.

Welsh Language Commissioner

Question 2 – Have you read the ‘Refresh of the Criteria for the accreditation of initial teacher education in Wales’ consultation document?

Yes	✓	No	<input type="checkbox"/>
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If you have selected ‘No’ we recommend you read the document before continuing with the questionnaire.

Question 3 – 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	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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If you have any comments related to your response, please use this space to elaborate.

<p>The sentence <i>‘the Welsh Government’s aspiration for a million Welsh speakers by 2050’</i> does not reflect the extent of the Welsh Government’s policy. The Welsh Government’s policy is to work towards ensuring that there will be a million speakers by 2050. It is more than an ‘aspiration’ for there is a detailed strategy for achieving this policy and ensuring that there are sufficient teachers who can teach through the medium of Welsh is fundamental towards achieving this policy objective.</p> <p>This section should also refer to the Welsh Government’s Welsh in Education Workforce Plan and the clear focus on developing the Welsh language skills of pupils in the new curriculum.</p>
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Question 4 – 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	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
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If you have any comments related to your response, please use this space to elaborate.

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.

Question 5 – 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	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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If you have any comments related to your response, please use this space to elaborate.

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Question 6 – 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	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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If you have any comments related to your response, please use this space to elaborate.

Question 7 – 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	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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If you have any comments related to your response, please use this space to elaborate.

Question 8

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?

Supporting comments

We welcome the fact that the criteria have been strengthened in terms of Welsh language requirements. The Welsh language is featured more prominently throughout, and section 4.6 provides stronger guidance to Partnerships on how they ought to strengthen their Welsh language provision. However, there is scope to strengthen some elements of the criteria further, and we consider it essential to do this to ensure that the criteria reflect the Government's objectives and targets regarding the growth of Welsh-medium and bilingual education. 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.

As you're aware, the Welsh Government is committed to introducing a Welsh Education Bill during this Parliament. The co-operation agreement between Welsh Labour and Plaid Cymru states that one of the core aims of the Bill will be to '*set new ambitions and incentives to expand the proportion of the education workforce who can teach and work through the medium of Welsh.*' The exact content of the proposed Bill with respect to the education workforce and its implications for ITE and the professional development of teachers in the future is not yet clear.

In our opinion the Welsh Government's vision and targets for the Welsh language in education will inevitably require the integration of Welsh language training as an integral part of teacher training and teachers' ongoing professional development. In other words, all trainees will need to attend Welsh language courses whilst training to become teachers, and this will lead to further training during the induction period of teachers, and as part of the lifelong professional development of teachers in Wales. In effect all teachers will need to be placed on a Welsh language continuum. To implement this effectively such provision will need to be designed and co-ordinated at a national level.

We fully accept that the criteria cannot predict these developments. However, the Welsh in Education Workforce Plan gives a clear indication of the direction of Welsh Government policy. Several commitments in this plan (objectives 1.6 and 3.2 in particular) are moving in the direction of providing teachers Welsh language training on a national level. The refreshed criteria do not currently reflect or support this policy direction. We accept that there are limits to what can be included in such criteria, but the criteria can be much more ambitious in seeking to reflect and take full advantage of what has already been published in the Welsh Government's Welsh in Education Workforce Plan. Below we outline the main improvements we would like to see in the draft criteria:

Strategic approach for the Welsh language within ITE Partnerships

- We welcome the intention to encourage all Partnerships to develop a more strategic and long-term approach to strengthening Welsh language provision on ITE courses. Nonetheless, the requirements outlined are vague, and they do not adequately explain the requirements placed on Partnerships.
- The criteria need to prescribe in more detail what developing a strategic approach for the Welsh language entails. If developing such a strategic approach is included in the criteria, and that having such a strategic approach is a condition for accreditation, then it is essential that the document outlines in more detail what is expected of Partnerships. There is a clear opportunity here to encourage Partnerships to develop ambitious plans for developing and strengthening their Welsh language provision over time. For example:

- are Partnerships being asked to develop a 'vision' or a 'strategy', or both?
- are Partnerships expected to develop this vision/strategy as part of applying for accreditation?
- what is the requirement in terms of outlining and publishing this strategy?
- Following the above points, what are the expectations regarding the content of these strategies, and what are the criteria for distinguishing a strong strategy from those which are weak or insufficient? The draft criteria do refer to some key elements, but it should go further, including requiring Partnerships to develop their local strategies in light of the Welsh in Education Workforce plan. For example:
 - how will the Partnership use the available data to understand the demand for bilingual teachers and to plan their recruitment strategy?
 - how will the Partnership take advantage of the national programme of Welsh language courses for ITE students?
 - what are the Partnership's plans for providing Welsh/bilingual placements to trainees?
 - how will the Partnership use the 'Language competency framework for education practitioners' to plan and develop their provision?
 - how will the Partnership encourage trainees who speak Welsh but who might lack confidence to work through the medium of Welsh?
 - how will the Partnership prepare trainees to plan the development of their Welsh language skills throughout their careers, as part of their ongoing professional development?
 - Partnerships should be required to include short, medium and long term objectives for developing their Welsh language provision and to increase the number of teachers who are able to teach through the medium of Welsh and bilingually.
- We believe that these strategies could also be linked with the requirements for monitoring and planning provision at a national level (see our comments below on accountability and monitoring).
- To summarise, we welcome the intention behind this section on developing a strategic approach. However, further detail and clarity is required regarding what is expected of Partnerships when developing such a strategic approach.

Partnership provision to improve the Welsh language skills of all ITE students

- It is positive that this section is more detailed than what currently exists. However, this section is still vague as to what Partnerships are expected to do. We believe that this section needs to be more prescriptive, and also the requirements need to be linked more clearly with national plans and strategies.
- It is positive to see specific reference to the 'Language competency framework for education practitioners', and we are pleased to see that Partnerships will be required to assess the Welsh language skills of trainee teachers at the beginning and end of the programme. What is missing, however, are specific requirements

about what Partnerships are expected to do to facilitate progress along this linguistic continuum. Beyond the requirement for all student teachers to have at least 35 hours of Welsh language skills training, there is little detail on what Partnerships are expected to do to develop trainees' Welsh language skills.

- Following on from the above point, it is unclear upon what basis it was decided that 35 hours was the minimum Welsh language training required by trainees. Is there any evidence of the expected skills different trainees should have after receiving 35 hours of training? How do these expected linguistic outcomes correspond to the objectives and targets of the Welsh Government on expanding Welsh medium education and increasing the use of Welsh in English medium schools? Objective 3.2(1) of the Welsh in Education Workforce Plan commits to implementing a national programme of language courses for all ITE students, and that such provision will be planned in accordance with defined linguistic outcomes. There is no reference to this in the criteria, and instead there is only reference to a minimum of 35 hours of training.
- The Welsh in Education Workforce Plan commits to *'formalising the requirements for implementing and moderating the Welsh 'Language competency framework for education practitioners'*. The criteria do not contribute in any significant way to formalising the requirements for implementing this framework. To contribute to this key commitment, further detail and guidance is needed. For example, the criteria should encourage Partnerships to use this framework to plan appropriate language training for different trainees. We wish to see the criteria encourage Partnerships to develop specific plans for those trainees who can speak Welsh, but who currently may lack confidence to teach through the medium of Welsh. Partnerships should be encouraged to use the framework to plan and tailor language training pathways to different groups of trainees (that is, depending on their Welsh language ability at the outset). Put simply, the criteria have the potential to provide much clearer guidance on how Partnerships ought to use and implement this framework to increase the number of teachers able to teach bilingually.
- Linked to the above point, there is no recognition or reference in the criteria to the relevance of plans to develop Welsh language training for ITE students on a national level. The Welsh in Education Workforce Plan commits to the following: *'Provide a programme of Welsh language courses for students to develop their language skills in accordance with the 'Criteria for the accreditation of initial teacher education programmes in Wales' and 'Language Competency framework for education practitioners.'* (objective 1.6(4)). The workforce plan indicates that the responsibility for delivering this objective is placed on ITE providers, the Coleg Cymraeg Cenedlaethol and the National Centre for Learning Welsh. Objective 3.2(1) of the workforce plan commits to: *'Implement a national programme of free Welsh language courses for all ITE students and practitioners in accordance with the 'Language Competency framework for education practitioners and with defined linguistic outcomes.'* The criteria make no reference to this language provision that will be developed nationally, nor do they connect this with the requirements for Partnerships to provide a minimum of 35 language training to all students. It is unclear why the criteria do not encourage, or make it a requirement, for Partnerships to explain how they will take advantage of this national language

training provision, and how they will integrate elements of this language training as an integral part of their ITE provision for different groups of trainees.

- The general point here is that the criteria do not reflect the commitments included in the Welsh in Education Workforce Plan. It is essential that the refreshed criteria are consistent with the commitments of the workforce plan, and that the criteria contribute as much as possible towards achieving the plan's objectives, and as a result to the Welsh Government education policies.

Partnership provision in Welsh for those wishing to pursue careers in Welsh-medium or bilingual schools

- The meaning of the section which states that '*Partnerships should plan and implement ready for the third round of accreditation*' is unclear. It seems that this section corresponds to objective 1.5(1) of the Welsh in Education Workforce Plan, which is to '*include a clear definition for the minimum requirement for Welsh-medium ITE provision*'.
- It is unclear why these minimum requirements are not included as part of this accreditation cycle. Ensuring that all resources provided to student are available bilingually and ensuring that 50% of all sessions lead by the HEI's are available through the medium of Welsh are appropriate requirements for this accreditation cycle.
- Recruitment is a key issue in relation to increasing the number of teachers who will be able to teach in Welsh/bilingual medium schools. We accept that the consultation document makes clear that processes relating to workforce supply continue to be managed separately. However, we believe that section 4.6 (and possibly other sections of the criteria) could at least refer to the priority of recruiting more Welsh speakers. For example, since September 2020, ITE providers are required to aim towards ensuring that 30% of the students they recruit are training to teach through the medium of Welsh. The criteria need to refer to this target and should require that Partnerships commit to this and explain how they will meet the target. As we have already set out, the criteria should require that all Partnerships develop a clear recruitment strategy as part of their strategic and long-term plans for the Welsh language.

Inspection, monitoring and accountability

- As has already been noted, one weakness in the criteria is a lack of clarity on who will be responsible for inspecting and monitoring Welsh language provision, and how this will happen.
- Unfortunately, appendix 1 (which focuses on Estyn's role) is not included in the document. It is therefore not possible to give an opinion as to whether Estyn's inspection and monitoring work will be sufficient to do what is needed in order to ensure that the expectations from a Welsh language perspective are realised. Specific responsibilities need to be placed on someone to do the work of driving the Welsh language agenda at a national level.
- The requirement for Partnerships to develop a strategic and long-term approach to the development of Welsh language provision offers a clear opportunity to

consider what further national support could be provided. For example, it is possible that specific responsibilities could be given to the Education Workforce Council, the Coleg Cymraeg Cenedlaethol, and the National Centre for Learning Welsh to work together to support the Partnerships' strategic plans to develop Welsh-language provision. Having such a process would alleviate some of our concerns about the current vagueness of some elements of the revised criteria regarding Welsh language provision.

Miscellaneous issues

- The third paragraph of section 4.6 states '*such considerations should be addressed in the following ways*'. The Welsh language version of the document is different and reads '*such considerations should be addressed in the following two ways*'. It is not clear which two ways are referred to in the Welsh language version, as three sections follow.
- The first sentence of section 4.6 refers to the *Cymraeg belongs to us all* speech. It is unclear why the criteria refer to this speech rather than to the more obvious strategies, plans and targets that detail the Government's policies on education and the Welsh language.

Question 9 – 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.

Supporting comments

See our response to question 8 above.

Question 10 – 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:

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: