

Consultation on introducing provisional registration with the General Teaching Council for England (GTCE) for trainee teachers, unqualified teachers and instructors

Consultation Response Form

The closing date for this consultation is: 27 June 2008
Your comments must reach us by that date.

department for
children, schools and families

THIS FORM IS NOT INTERACTIVE. If you wish to respond electronically please use the online or offline response facility available on the Department for Children, Schools and Families e-consultation website (<http://www.dcsf.gov.uk/consultations>).

The information you provide in your response will be subject to the Freedom of Information Act 2000 and Environmental Information Regulations, which allow public access to information held by the Department. This does not necessarily mean that your response can be made available to the public as there are exemptions relating to information provided in confidence and information to which the Data Protection Act 1998 applies. You may request confidentiality by ticking the box provided, but you should note that neither this, nor an automatically-generated e-mail confidentiality statement, will necessarily exclude the public right of access.

Please tick if you want us to keep your response confidential.

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If your enquiry is related to the policy content of the consultation you can contact the DCSF enquiry line on: 0870 000 2288

Please mark an X in the box below that best describes you as a respondent

<input type="checkbox"/> Local Authority	<input type="checkbox"/> Maintained School	<input type="checkbox"/> Teacher Training Provider
<input type="checkbox"/> Public Organisation	<input type="checkbox"/> Representative Organisation	<input checked="" type="checkbox"/> Other (Please Specify)

Please Specify:

The General Teaching Council for Wales is the statutory, self-regulating professional body for teachers in Wales. It seeks to raise the status of teaching by maintaining and promoting the highest standards of professional practice and conduct in the interests of teachers, pupils and the general public.

1 Are the proposals clear in terms of who would be covered by the requirement to be provisionally registered?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

The Council is clear that provisional registration is intended to be a category of registration for two specific groups who are involved in teaching activities but who, are not qualified teachers, namely:

- trainee teachers on mainstream initial teacher training (ITT) courses or employment-based routes to qualified teacher status; and
- unqualified teachers currently undertaking specified work in schools – such as Instructors and Overseas Trained Teachers without QTS.

The Council notes the reasons for this revision, namely:

For those training to be teachers, provisional registration will:

- provide a useful stepping stone to full registration;
- enable GTCE to assess whether an applicant is suitable for registration before starting training rather than after QTS is awarded;
- enable GTCE to ensure a trainee complies with the Council's Code of Conduct and Practice while training.

For unqualified teachers who are undertaking specified work in schools, provisional registration will:

- provide more consistency across the profession as all those carrying out

specified work would be subject to an assessment of their suitability and the same regulatory framework;

- a reassurance to parents, who may not be able to distinguish between registered teachers and others who undertake specified work but are not registered.

2 Are the phasing arrangements for PR clear and reasonable?

X Yes

No

Not Sure

Comments:

The Council understands that a two stage phasing strategy will be adopted, with new trainee teachers being provisionally registered from September 2008 and other persons undertaking specified work being provisionally registered from September 2009.

The Council considers it prudent to stagger the implementation over two years due to the significant numbers of persons who will need to be provisionally registered. This will provide sufficient time for GTCE to complete the necessary preparatory work.

3 Is it clear how the Council's regulatory framework would apply to those who would be provisionally registered?

X Yes

No

Not Sure

Comments:

The Council considers that the consultation proposals are clear in specifying that GTCE's regulatory framework will apply to all persons who are provisionally registered with GTCE. The Council notes that the key components of the framework are:

- GTCE will ensure that applicants are eligible for registration;
- GTCE will assess applicants for their suitability to be registered teachers;
- Provisional registrants will be expected to comply with the GTCE Code of Conduct and Practice, which will be revised to cover provisional registrants;
- GTCE disciplinary procedures will be extended to cover provisional registrants.

The Council also supports the intention to amend ITT requirements in England, requiring a training provider who has removed a trainee from a course of ITT in specified circumstances to refer the matter to GTCE.

4 Do you agree with the Council Membership conditions which would apply for those with provisional registration?

X Yes

No

Not Sure

Comments:

The Council supports the proposal that those with provisional registration will be eligible to vote in elections, but not stand as candidates. The intention being that GTCE should be able to call on the services of those with experience in the profession, as its members.

5 Are the proposals for the funding of the programme up until 2010 reasonable?

X Yes

No

Not Sure

Comments:

The Council acknowledges that the charging of a registration fee for provisional registrants is potentially a delicate issue. In this regard, there will be balance to be struck between:

- (a) ensuring that GTCE, as an independent self-regulating professional body has sufficient funds to enable it to discharge its regulatory role in respect of provisional registrants appropriately;
- (b) recognising that trainee teachers will not be in receipt of an income and others undertaking specified work will usually be in receipt of salaries which are lower than those for registered teachers.

The Council notes that DCSF intends to give further thought as to how the costs of provisional registration will be met in the future, but in the interim, it will fund the scheme until April 2010. This is deemed to be reasonable.

6 Is the four week exemption from the requirement to be registered sufficient to ensure applicants are registered before starting training or specified work in schools?

Yes

No

Not Sure

Comments:

In Wales, Welsh Assembly Government Regulations require that qualified teachers who undertake “specified work” in a maintained school are registered prior to taking up their post in a maintained school.

While the Council is aware of the 4 week exemption in England, the Council considers that the Regulations in Wales are an important element of ensuring compliance with the registration requirement by employers and agents and in protecting pupils and the public.

The Council takes a similar stance in respect of provisional registration.

7 Do you have any other comments you wish to make on the proposals?

Comments:

1. Under the Education Act 2002, provision is made to introduce a category of provisional registration. At the time, the Council was not content with the wording of the Act which did not give the GTCW sufficient flexibility to define provisional and full registration in the way it wished.

The Council agreed in October 2005 that it should **“continue to regard all forms of ‘registration’ as being post-QTS”**. In its 2006 advice to the Assembly Minister for Education, Lifelong Learning and Skills on a Professional Development Framework for teachers in Wales, the Council made recommendations to **re-align “full registration” with achievement of the statutory Induction standard with “provisional registration” given to teachers who have QTS but who have not yet passed the induction standard**. This is the arrangement that applies in Scotland. Such a re-alignment will give a form of professional recognition to teachers who have passed the Induction standard.

The Minister accepted this recommendation in principle but it will require amendment to primary legislation to bring this about for Wales.

2. As we will not be introducing provisional registration for teachers in Wales, it will mean that teachers who are provisionally registered in England will still be subject to the GTCW’s full registration requirements (including determination of their suitability) should they apply to register with GTCW in order to work in Wales.



Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply X

Email address for acknowledgment hayden.llewellyn@gtcw.org.uk

Here at the Department for Children, Schools and Families we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

XYes	<input type="checkbox"/>	No
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All UK national public consultations are required to conform to the following standards:

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
3. Ensure that your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process influenced the policy.
5. Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

Further information on the Code of Practice can be accessed through the Cabinet Office Website: <http://www.cabinetoffice.gov.uk/regulation/consultation-guidance/content/introduction/index.asp>

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 27 June 2008

Send by post to

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