

DCSF: Your child, your schools, our future: building a 21st century schools system

A response to the White Paper from the General Teaching Council for England (GTC)

Introduction

1. The General Teaching Council for England (GTC) is the independent professional body for the teaching profession. Its main duties are to regulate the teaching profession and to advise the Secretary of State on a range of issues that concern teachers and teaching and learning. The Council acts in the public interest to contribute to raising the standards of teaching and learning.

Summary of key points

2. The GTC welcomes the recognition of the need to draw out in more detail the relationship between the vision of the Children's Plan and the work of schools. It is a vision that the GTC has warmly supported: children and young people need schools that offer excellent tailored support for their learning and development, and, through partnership, can provide access to broader curricula, or services that meet children's and families' wider needs.
3. The GTC supports the Government's recognition that schools, drawing on support as appropriate, are responsible for their own improvement, and that at this point in time, this implies changes for the level of central direction of schools. It also implies changes to accountability.
4. Teachers need to be encouraged and supported to exercise informed professional judgement in order to lead sustained improvements in teaching. Taken in the round, the White Paper's accountability proposals are unlikely to strike the necessary balance between accountability and earned permission to practise.
5. The Licence to Practise has potential to play a role in the accountability framework if not simply layered on top of teachers' existing accountabilities. It will require better quality assurance of performance management.
6. An entitlement to continuing professional development (CPD) should be a further prerequisite for the Licence to Practise (LtP) and needs to address quality as well as sufficiency of CPD, and equity of access.

7. The GTC welcomes the Government's continuing efforts to refine and improve the stake held by pupils and parents in the work of schools. The quality of these relationships has a strong bearing on children's outcomes.
8. The GTC welcomes the focus on parental engagement but questions whether the notion of a 'guarantee' is the most useful one. The GTC recommends an emphasis on developing mutually respectful and constructive relationships between parents, teachers and other school staff, supported by appropriate training and resources, including time.
9. The GTC hoped to see more in the White Paper about children and young people's involvement in shaping and evaluating their own learning – the emphasis on parents appears to be at the expense of children and young people, whose engagement is if anything more critical still to the success of education. The pupil guarantee tends to cast the pupil as the passive recipient of a range of 'entitlements'.

Overarching comments

10. The White Paper provides the most recent insight into how wider thinking on public service reform across government is having an impact on education policy. There is some understanding that the sorts of central direction that were deemed necessary a decade ago have had their impact and left the system in a different place. To paraphrase Sir Michael Barber in his work with the Cabinet Office, these methods will not work for a phase of system improvement 'from good to great'. The White Paper seems to embody the continuing tension between a recognition that there must be less central direction, a strengthened hand for service users, and greater empowerment for effective service providers on the one hand, and a persistent belief that the government can identify best practice and replicate it.
11. Effective teaching is known to be the most important in-school factor contributing to good educational outcomes, and so the GTC poses this question of the White Paper: how much of what is proposed will ensure that our teachers are competent in their practice and confident in their ability and opportunity to shape and transform education through the exercise of informed professional judgement?
12. The GTC has been encouraged by the emphasis on new professionalism that the Cabinet Office has promoted in recent years. One of the three Cabinet Office principles for public service reform is:

A new professionalism, to give freedom to service leaders, professionals and communities to lead, run and personalise services.¹

¹ Cabinet Office (2009), *Excellence and Fairness: Achieving World Class Public Services*

13. The GTC contends that this White Paper may communicate something of this vision for a new professionalism to service leaders, and to communities, but it conveys less of this sentiment to teachers – whose professionalism is key to its realisation².
14. The departure from the government vision of new professionalism is perhaps starkest where the White Paper touches on accountability. An emerging theme of the GTC's own work on accountability in teaching is the need to achieve a better balance between different sorts of accountability. 'High stakes' institutional accountability dominates in education with professional accountability the poor relation. This does not encourage teachers to take responsibility for standards of practice and it also has a negative effect on teachers' attitudes towards accountability³. If the Licence to Practise is intended to strengthen professional accountability it will not convey a message of trust and permission to innovate to the profession if it is simply layered on to the many existing accountability mechanisms to which teachers are already subject. There urgently needs to be a better balance in teaching between enabling teachers to use their expertise to enhance teaching and learning, and the legitimate act of holding professionals to account for their practice.
15. If we recognise that, in the words of the White Paper,

The quality of a school system cannot exceed the quality of its workforce

and that, in the words of the Cabinet Office in its recent report on lessons from the world's best public services⁴,

World class services unlock the creativity and ambition of world class professionals

then key policy documents like this White Paper need to signal belief and trust to those on the frontline. Only then will they move us closer to the vision for teaching in the future, as promoted by the GTC:

Teaching in 2012 will thrive in an environment that enables teachers to exercise informed professional judgement and allows good leadership to flourish. The challenges faced by teachers in their day to day practice will be recognised and the practice of teaching celebrated as a complex and creative activity. The experience and expertise of the profession will influence national and local policies for teaching and learning in the interests of all children and young people⁵.

² The DCSF was also taken to task by the Sunningdale Institute for failing to take seriously the engagement of those only the frontline. It observed, 'The Children's Plan had a simple guide prepared for children and parents – but not for the frontline workers who had to implement it.' Sunningdale Institute (2009) *Engagement and Aspiration: reconnecting policy making with frontline professionals*

³ GTC (2009), *Survey of Teachers*

⁴ Cabinet Office (2009), *Power in People's Hands: learning from the world's best public services*

⁵ GTC (2009), *Teaching in 2012*

Specific comments

A 21st century education

Personal tutors

16. The GTC supports in principle the proposal that there should be a named teacher who will maintain an overview of each pupil's progress and well-being, with whom parents can liaise. We believe that measures of this sort aimed at improving the opportunities for constructive dialogue between parents and schools are potentially more beneficial to both parties than notional entitlements that parents may not feel empowered to uphold. We know that parents can find the transition to secondary school difficult as they do not always as involved with their child's education. Much of the good work about family-school relationships, such as that of the Family and Parenting Institute⁶, effectively highlights why the relationship can be fraught from the parents' perspective. Our evidence suggests that teachers are also anxious about getting the relationship right, and well aware of its importance. Communicating with parents and carers is one of the aspects of teaching about which newly qualified teachers feel least confident⁷. This is not just due to lack of experience. The GTC's 2009 Survey of Teachers shows that 91 per cent of teachers recognise informing parents as one of the most importance purposes of accountability in education, but 28 per cent of teachers do not feel they have sufficient opportunity to provide parents with a full and rounded account of their children's learning. The GTC would welcome more detail on the skills and resources that are required for this role to have the desired impact on children's well-being and learning.

Extra help for extra need

17. The proposals for the provision of additional support for pupils with additional learning needs are very welcome, but lack flexibility. In line with the commitment to tailored support, it would be more appropriate for teachers to have the opportunity to deploy resources for additional support flexibly, on the basis of their professional judgement, within the context of the imperative to narrow gaps in achievement.
18. Both the personal tutor and additional support initiatives will need evaluation to ascertain impact and to assess which of the models adopted by schools prove most effective.

Early intervention

19. The GTC welcomes the government's commitment to returning to the theme of early intervention in more detail later this year. The early intervention white

⁶ Page, A., Das, S., Mangeibeira, W and Natale, L., (2008), *School-parent partnerships*, Family and Parenting Institute

⁷ TDA (2008), *Annual NQT Survey*

paper will need to remind practitioners that early intervention is an important first step, but equally important are the next steps: early identification of needs, early access to the appropriate expertise and/or resources, sustained action and review. Although the GTC agrees with the repeated assertion that schools are well placed to play a key role in early intervention, insufficient attention has been given to the implications for staff training and deployment.

20. Safeguarding is an important aspect but not the only need. School staff need to understand and be committed to discerning early signs that children are in difficulties of one sort or another. They need to be skilled in raising issues with colleagues and families, and to understand how and when to draw on other expertise. Also important is an understanding of how different groups of children can be vulnerable to poor outcomes, and yet to have high expectations of all children regardless of their circumstances. They may need to be attuned to specific characteristics of, or developments in their localities. Schools need to develop relationships with families and other significant adults that enable them to have a rounded picture of a child's circumstances.
21. The GTC hopes that the White Paper on early intervention will be unambiguous about the need for teachers and other school staff to have the requisite skills, knowledge and opportunities to make a positive contribution to early intervention. In particular, the forthcoming White Paper could usefully direct all sections of the children's workforce including school staff to the Children's Workforce Network's Statement of Values for Integrated Working with Children and Young People, the development of which was led by the GTC. The government could further embed the values associated with early intervention and integrated working by ensuring that the revised Common Core of skills and knowledge for the children's workforce refers to the Statement of Values, and that qualifications that sit on the Integrated Qualifications Framework all feature the Statement of Values. The revised Common Core also needs to be a more explicit element of the framework shaping initial teacher education.

School contribution to health outcomes

22. The GTC welcomes the emphasis in the White Paper on schools' promotion of personal health and wellbeing, both of which are fundamental to the GTC's concept of an education. It is disappointing that the White Paper makes no mention of the 2004 *Choose Health* white paper pledge that every secondary school would have access to a specialist school nurse by 2010. There is already concern at the use of the less precise phrase 'school health team' in the 2009 strategy *Healthy Lives, Brighter Futures* and access to specialist school nurses is critical to schools' capacity for early intervention.

Teaching and learning policies

23. The GTC endorses the government's belief that every school should have a teaching and learning policy, and recognises that for many schools such a policy is already an important point of reference in planning and evaluating teaching and learning. The GTC would welcome informed discussions about

pedagogy taking place in every school, and that might be supported by materials including summaries of the best research and other evidence. The GTC is not persuaded that the government specifying a teaching and learning policy is the best vehicle for stimulating and supporting this activity.

Curriculum flexibility and breadth

24. The GTC has commented extensively on the various curriculum reviews that are cited in the White Paper and will not rehearse its views here. The commitment to greater flexibility in the curriculum is welcome. In the recent past teachers have not always experienced encouragement to innovate when it was permitted – for example, many thought the National Curriculum was statutory when it was not⁸. It is necessary to establish a culture in which informed innovation is encouraged and supported, with all that implies in terms of professional learning related to curriculum design, and the availability of time.
25. The GTC welcomes the commitment to breadth and balance in the curriculum and it will be important to monitoring the implementation of new curricula to ensure that this is what pupils' experience.

Assessment

26. The GTC is a long-standing advocate of the critical contribution to learning of teachers' diagnostic, formative and summative assessment. It has contributed to the work of the Expert Group on Assessment. We welcome the recognition that teachers may need access to support and development in order to play an enhanced role in assessment. As with the curriculum, the process of moving to more teacher led assessment needs to be seen as one of cultural change – as well as capacity building – after an era in which greater emphasis was placed on external testing. Apart from the need to focus professional learning on assessment at all stages of a teacher's career the Expert Group's recommendation on the importance of building moderation structures and the development of lead assessor in and across schools are also critical.

Parent and pupil guarantees

27. The GTC understands the introduction of the guarantees to be an attempt to strengthen the relationship between parents, pupils and schools through clarity about entitlements and responsibilities on the part of each. The content is unobjectionable but does not lend itself to a 'guarantee' in the sense that there is no mechanism for ensuring that its terms are met or remedial action in the event that they are not. For example, it seems unlikely that every 5-16 year old will have access to 5 hours of high quality PE and sport per week by September 2009, but the fact that this commitment features in a 'guarantee' does not provide pupils with a means to address any deficit. Similarly, the act

⁸ QDCA is reporting also reporting that after its first year, early years staff believe more of the EYFS to be mandatory than is the case.

of including in a 'guarantee' a statement that parent's views on extended services will be 'listened to and acted upon' does not provide a course of action to a parent who has a less satisfactory experience.

28. In relation to pupils and parents, the GTC would recommend a clearer focus on the sorts of measures that empower each to engage, in ways known to have a positive impact. For example, the GTC would have welcomed more attention to how pupils can play an active role in their own learning and in shaping and evaluating the services they receive, as there is much evidence to suggest that this sort of engagement leads to improved services and outcomes.
29. With regard to parents, it is right to ensure they have the information they need to support their own child's learning and hold an appropriate stake in the school, but it is important to guard against placing so much emphasis on parental engagement that those children whose parents do not engage are further disadvantaged⁹. The GTC's reading of the evidence on relationships between parents and schools is that the priority should be supporting parents, teacher and other school staff in mutually respectful and constructive dialogue about children's learning, and the emphasis should be as much on the *responsiveness* of school to parents and vice versa,, as on formal accountability.
30. The Parent Guarantee requires schools to take account of parents' views on the additional needs of their child when they join a school and if problems occur. The GTC suggests that schools should take account of parents' views of additional needs at any time, subject to parents' understanding that there may be limitations on schools' capacities to meet additional needs.

Partnerships

31. The GTC endorses the need for schools to work in partnership with each other, with HEIs, with other statutory and third sector bodies that contribute to children's service delivery. There are proposals within the white paper that the GTC welcomes as supportive of partnership. These include the availability of further funding for the co-location of services on school sites, and the proposals to give schools a stronger stake in Children's Trusts. We also welcome the sensible suggestion that OFSTED will endeavour to inspect schools in partnership in a co-ordinated way where possible.
32. Another important and welcome theme of the White Paper is the focus on knowledge and practice transfer between schools, particularly to counter the variability in performance between schools. The GTC welcomes the proposals to extend local leaders of education beyond city challenge areas, to

⁹ For example, recent research on extended schooling suggests that in many cases the offer is not reaching low-income families, DCSF (2009) *Extended Schools Subsidy Pathfinder Evaluation: interim report*, DCSF-RR1 32

experiment with the establishment of priority learning local authorities, and programmes to open up schools to showcase their effective practice to peers.

33. The recent National Audit Office Report¹⁰ on school partnerships suggests that the schools deemed most effective by OFSTED are less likely to be involved in partnership and the GTC supports its recommendation that ways be found to incentivise their collaboration with other schools.
34. The GTC is less convinced by those measures that seek to direct partnership, such as introducing legislation around partnership, or requiring governing bodies to consider entering in to particular sorts of partnership. The NAO found that school-initiated partnerships accounted for the majority of partnerships, and for more of the effective partnerships than those associated with central initiatives. Central direction seems to go against the grain of forming and disbanding partnerships on the basis of business need and in response to local circumstances. The GTC supports the NAO recommendation that:

Except in cases where there is a good reason otherwise, schools should have the freedom to determine the best form and management of partnerships for their local context¹¹.

35. We think the emphasis should be on enabling partnership, by removing barriers to collaboration. This has been the emphasis of many interventions, such as developing new models of governance, and reviewing the rules governing funding streams. However, the GTC believes accountability is still a barrier to partnership. For example, the White Paper states that measures will be introduced to ensure that schools and their governing bodies have a responsibility to all the children and young people in the area, and not just those on their own school roll. It is 'high stakes' accountability at the level of the individual school that militates against schools taking this broader responsibility over matters such as admissions, exclusions and the acceptance of hard-to-place children. There need to be better ways of holding schools collectively accountable for some outcomes in their localities so that they can collaborate constructively without fear of the impact on their individual 'ratings'. The GTC fears that the advent of the school report card, despite the claims made on its part, places the emphasis again on the school rather than the outcomes for children and young people within the locality, to which the school makes a vital contribution.
36. The NAO report is also insightful about the characteristics of effective partnerships, and the fact that many school partnerships do not possess these characteristics. These include: clear objectives, external scrutiny, appropriate accountability, and cost benefit analysis. The GTC suggests that the best means of supporting effective partnerships involving schools is to promote awareness of the characteristics of effective partnerships, to provide

¹⁰ National Audit Office (2009), *Partnering for School Improvement*

¹¹ *Ibid*

non-bureaucratic means of supporting schools to emulate best practice, and to continue to develop modes of intelligent accountability for partnership work.

37. The GTC also suggests that policy relating to partnerships involving schools should be based on what is learned from emerging evidence. For example, the NAO finding that schools' most effective partnerships are often those between primary and secondary schools around transition suggests the need to safeguard these from being undermined by the promotion of other forms of partnership.

Accountability

38. The GTC is developing thinking on accountability in teaching, and will be setting out its findings in due course. It has also commissioned extensive research on teachers' views and experiences of accountability, which will be published shortly. Emerging themes include:

- accountability needs to make a stronger contribution to practice improvement;
- the concept of professional accountability in the public interest needs to be strengthened
- as schools build further capacity and provide opportunities for children and young people, and their parents, to be more active partners in learning, there may be more scope for schools to pursue locally determined outcomes, and
- there needs to be some rebalancing of the different spheres of accountability, with more intelligent accountability above and below the level of the institution – i.e. professional accountability and collective accountability within localities for outcomes.

School report card (SRC)

39. The GTC has contributed to the development of the school report card (SRC) proposals and its views on the prospectus are appended to this response. We maintain the view that the various stakeholders in school accountability have, legitimately, differing information needs and that it may not be possible to create one device for so many audiences and purposes. The GTC remains to be convinced of the availability of robust, outcomes-based, school-level data in some of the areas such as partnership and contribution to wider well-being that would have to be included if the SRC is to give a rounded picture of the school. It will be very important that the pilots are assessed against the original aim of the SRC: ensuring intelligent accountability across the full range of a school's responsibilities. If it cannot fulfil this aim it should be rethought.

40. The GTC notes that most respondents to the recent consultation shared its scepticism about the usefulness of a single overall grade and is disappointed to see that the government is minded to proceed with it, without support or compelling evidence.

Performance management

41. The White Paper says little about performance management, either as an aspect of the accountability system or as a driver of improvements in teaching quality. This is a worrying omission, particularly as performance management will be a significant element of two of the White Paper's important proposals – the Licence to Practise and an entitlement to CPD.
42. The GTC believes there is insufficient knowledge about the quality of performance management in schools, and as a consequence inadequate attention to addressing weaknesses where they exist. It is in the interest of pupils that performance management is robust: to address poor teaching and to support improving practice on the part of the majority of teachers who are good at what they do. It is also in the interests of teachers, and can contribute to their professional self awareness, motivation and aspiration. Evidence on performance management from the Training and Development Agency for Schools (TDA) suggests that

*Schools vary in their practice in terms of linking performance management processes, the professional standards and CPD opportunities. In some cases these links appear symbiotic, in other cases, dislocated.*¹²

43. The GTC's survey of teachers received responses from over 5,000 teachers on performance management. Just under half (49 per cent) of all teachers thought performance management was an effective way of holding teachers to account for the quality of their teaching with primary teachers more positive than secondary teachers (53 per cent and 44 per cent respectively). Senior teachers – who have responsibility for much performance management – are more likely to think it is effective (71 per cent of head teachers; 60 per cent of assistant/deputy head teachers). A third of all teachers (32 per cent) disagreed that performance management was effective in this regard.
44. Teachers who said they had had their CPD needs identified, had access to adequate CPD, and who believed their schools were good at evaluating the impact of CPD on practice were much more likely to be positive about performance management. This provides clues as to where deficiencies in performance management might lie for a third of teachers, and more optimistically, suggests that where performance management works, it has a positive impact on the availability, take up and impact of CPD.
45. The GTC recommends the collation of better evidence on the effectiveness of performance management, better support for teachers in undertaking

¹² TDA (2009), *State of the Nation Report*

performance management, and further attention to the role of the head teacher in assuring the quality and consistency of performance management across the school. Consideration should be given to the respective roles of OFSTED and School Improvement Partners (SIPs) in assuring the quality of performance management.

The work of OFSTED

46. The GTC has contributed to the development of the new OFSTED inspection framework. The GTC continues to support proportionate inspection, and believes it will be improved by many of the revisions to the framework for introduction in September 2009. The renewed focus on lesson observation will reassure those teachers who felt the process had become too paper-driven and systems-focussed. The GTC recommends that OFSTED inspection should only be involved in primary evidence-gathering for the purposes of triangulation with the evidence in the form of data and the dialogue with members of the school community. The GTC notes the introduction of limiting judgements and will be interested to see their impact on equality.
47. The GTC notes the plans for a new partnership grade as part of school inspection. The GTC remains unconvinced that school level inspection is the most appropriate vehicle for meaningful insights into partnership. However, as partnership is to be included, OFSTED might usefully conduct a thematic review aimed at informing knowledge of best practice in partnerships involving schools, and measuring progress in encouraging the most effective schools to participate in partnerships.

School Improvement Partners (SIPs)

48. The GTC has supported SIPs, believing schools benefit from sustained critical friendship about school improvement and perceiving benefits for the system of expert practitioners, especially serving heads, having the opportunity to interrogate the practice of another school in some depth. Although there is only limited research evidence on the work of SIPs, and little in particular on their impact, the White Paper proposes to invest heavily in what they contribute to the improvement and accountability system. The GTC suggests there are risks associated with this development.
49. While the references to additional training and accreditation are welcome, the demands of the enhanced SIP role may have an impact on the recruitment. It is important not only to recruit sufficient people with the expertise and authority to undertake the role, but also to guard against narrowing the field of those who can undertake the role – for example, if the SIP role became too onerous for many serving head teachers, there would be a loss to the system in terms of knowledge transfer. The emphasis on proportionality else in the accountability system might also apply to the work of SIPs. The GTC is also concerned about the local authority being over-reliant on the SIP for evidence of school performance, given its responsibility to intervene in under-performing schools.

50. The GTC welcomes the government's clarity that the SIP role is one of support and challenge on school improvement *and* on wider the *Every Child Matters* work of schools.
51. The GTC supports the strengthened relationship between the SIP and the governing body as a means of ensuring that the SIP role results in appropriate challenge to the school.
52. The GTC notes the proposal that SIPs be empowered to authorise new specialisms on the part of schools. There will need to be mechanisms for ensuring that their decisions are based on the interests of the locality and not just the school with which they are working.
53. Finally, the GTC suggests that as SIPs are established in this new role it will be important to look closely at the balance of accountabilities between the head teacher and the SIP, to ensure that the head teacher is supported, challenged where appropriate, but not undermined.

System level support and challenge

Direct School Grant

54. The GTC looks forward to considering the specific proposals arising from the review of the Direct Support Grant in early 2010, but is encouraged by the commitment that the review will better target additional resources on deprived children, and that what emerges will be more responsive to changes in pupil characteristics at a school and authority level.

Local authorities

55. The GTC is concerned about an apparent imbalance between rights and responsibilities in the school improvement role set out for local authorities in the White Paper. 'Tailored support' is a strong theme elsewhere in the White Paper but the relationship between local authorities and schools is to be transacted almost entirely through SIPs in every case, while LAs retain a duty to intervene if schools are in difficulties. It would seem more appropriate to require LAs to take a proportionate approach to school support, mirroring the nuanced approach to supporting LAs required, by the DCSF, from Government Offices.
56. The GTC supports the notion that many schools – particularly those demonstrably doing well – are able to decide which external partners and services they wish to use. They should be free to choose local authority provision where they have found it effective. The size of the school will also have an impact on its capacity to absorb the overheads associated with contract procurement and management. Schools have not been closely involved with the extensive capacity-building effort at the local level around commissioning and many will need to enhance their skills and capacity in this regard. The fact that schools were not in the 'first wave' of local

commissioning can be turned to their advantage as they can benefit from lessons learned by Trusts and others. Schools should have access to resources that distil into a simple form some of the best evidence about, and processes for, outcomes-based commissioning, and training based on these resources would benefit head teachers, school bursars and others. For example, the recent DCSF research report on commissioning children's services¹³, while focussing on local authority commissioning, has many messages about commissioning competencies, capacity evaluation, and so on that pertain equally to school level commissioning.

The workforce

57. The GTC supports the opening statement of the White Paper's chapter on the workforce:

The quality of a school system cannot exceed the quality of its workforce.

58. The chapter highlights the key components in securing a high quality teaching workforce: attracting the strongest applicants; offering the best professional preparation; expecting and supporting ongoing professional development; developing, recognising and rewarding new roles. However, the White Paper does not set out what the government's vision for teaching in the 21st century school. The vision is not translated into implications for teachers and teaching in important respects, including the implications of the strengthened school role in meeting wider needs of children and families, and of the withdrawal of prescription in the form of national strategies and new opportunities for flexibility in curriculum delivery. These developments imply changes in professional orientation – what teachers understand their responsibilities to be – and may require different forms of professionalism to be enacted – for example, to initiate curriculum innovation.

Initial Teacher Training (ITT)

59. The GTC suggests that a wide ranging review of entry into the teaching profession would be timely, in response to significant changes in our expectations of teachers, and in order to forge a better relationship between initial professional preparation, induction, early and continuing professional development. This should cover structure, organisation, length and content. The GTC questions whether it is possible to develop knowledge of pedagogy, curriculum, specialism and skills to teach effectively across a wide age range within the current time available for preparation, particularly in postgraduate and/or employment based routes.

¹³ DCSF (2009) *Commissioning Services for Children, Young People and Families: A Study of the Dynamics in Six Local Authority Areas* DCSF-RR133

Masters in Teaching and Learning (MTL)

60. The GTC welcomes initiatives designed to broaden teachers' access to high quality CPD and to improve teachers' professional status. The MTL is still in its developmental stage and the GTC will apply two important questions to its evaluation over time:
- Does the MTL have a positive impact on teaching and on learning outcomes?
 - Is the advent of the MTL beneficial, or at least, neutral to other CPD provision known to have a positive impact on teaching and learning?
61. The second question is significant for the GTC because of its association with the Teacher Learning Academy.
62. There is a risk that the MTL could become a staging post for career progression rather than a lever to improve teaching and this needs to be managed. If the MTL is to be effective in changing practice, it will need to be responsive to the learning needs of the individual teacher, and this implies a constraint on the central prescription of content.

Licence to Practise (LtP)

63. The GTC advises the application of the same test for LtP as that set out for the MTL: will the Licence to Practise (LtP) have a positive impact on teaching and learning?
64. Having considered the existing evidence about teaching quality and teacher competence, the role of existing policies and arrangements to support quality and the limited evidence about the impact of revalidation or LtP in other professions, the GTC has adopted a number of principles to underpin future policy development in this area:
- a Entry and re-entry to the register should require a demonstration of suitability and competence.
 - b Teachers should retain registration through demonstrating competence against the appropriate professional standards as determined by performance management
 - c Teachers who fall outside performance management must demonstrate their suitability and competence by some other means.
 - d The GTC full register should hold only those whose competence is assured.
 - e The efficacy of existing levers (the professional standards and performance management) must be quality assured

- f Any requirements to remain registered must be based on evidence about the forms of CPD that create positive impact on teaching and learning.
- g The approach to revalidation needs to balance the benefits of the outcomes for teaching and learning with the cost of the administration and burden of the accountability.
- h The accountability system needs to be reconfigured to take account of any new balance between institutional, system accountability and greater individual professional accountability which results from a revalidation requirement.

School leaders as system leaders

- 65. The GTC agrees that the best head teachers have much to contribute beyond their schools, and has welcomed developments such as the introduction of school improvement partners for the opportunity it provides to use and to enhance the expertise of good school leaders. The GTC also recognises the need to explore different ways of deploying able head teachers because of challenges in recruitment to headship. While we welcome the provision and recognition of enhanced roles for able head teachers, the GTC cautions that closer attention to the sustainability of school improvement will be required if these innovations are to be scaled up as proposed. Greater thought should be given to the development of roles and infrastructure within schools so that new roles for head teachers are not a threat to school improvement but an opportunity for other staff. Parents and pupils will also need reassurance about changes and clarity about contacts and their availability.
- 66. The GTC recommends that developments intended to support system leadership and capacity focus not only on the actions of individual head teachers but on the capacity of the system to synthesise, test and use the knowledge they generate.

Wider school workforce

- 67. The GTC recognises the contribution to children's outcomes made by the wider school workforce and welcomes the advent of the School Support Staff Negotiating Body as an important first step to improving their rewards and status. We support the target that all school support staff should possess or be working towards a level 3 (L3) qualification, with the proviso that improving the qualifications of the least qualified should not distract from ensuring that all staff directly involved in teaching and learning are appropriately trained for this important work, even if they have L3 qualifications already.
- 68. In particular we believe that a progression route from Higher Level Teaching Assistant (HLTA) to qualified teacher status (QTS) for those who aspire to teach could assist with widening access to the teaching profession.

69. The GTC would advocate the extension of a CPD entitlement to all staff directly involved in teaching and learning. The GTC also advocates a form of regulation for such practitioners.
70. School workforce remodelling is sufficiently embedded for research evidence on its impact to be coming on stream and it will be important to ascertain that the investment in support staff is proving good value for money. The GTC will be particularly interested in evidence as to the impact of SWR on access to qualified teachers on the part of specific groups of pupils including those with special needs.
71. The GTC welcomes the commitment to ensuring all staff have access to high quality training about special needs and disabilities.

Pedagogy

72. The GTC has been developing and testing its own thinking on pedagogy in collaboration with the Teaching and Learning Research Programme (TLRP) and is encouraged that the government recognises the significance of pedagogy. The GTC trusts that the proposed debate on world class pedagogy will embrace all of those who might contribute with authority and expertise, and not be conducted solely between the Department, its agencies and Social Partners. It needs to take account of the work on pedagogy already underway not only at the GTC, but also from the QDCA, the SSAT, the TDA and others. The DCSF contribution might usefully be not another strand of work around pedagogy but an opportunity for those already undertaking related work to collaborate on a series of outcomes that might be determined in partnership. The GTC suggests one such might be a focus on how the users of education and teachers themselves might be helped to understand pedagogy as a body of complex, developing and testable expert professional knowledge.

APPENDIX 1

Issues paper: A School Report Card: Prospectus

73. This paper accompanies the GTC response to the White paper: *Your child, your schools, our future: building a 21st century schools system*.
74. The GTC notes that the original consultation document on the School Report Card pledged to undertake more in depth consultation on the detail of the proposals, following the publication of the White paper. The GTC has fed into the early thinking on the original proposals through engagement with the Department for Children, Schools and Families (DCSF). This paper sets out the Council's response on the detail of the proposals in the *A School Report Card: Prospectus*.
75. As highlighted in the response to the White paper: *Your child, your schools, our future: building a 21st century schools system*, the GTC welcomes the intended aims of the School Report Card and recognises the importance of providing current, accessible, balanced and comprehensive information on a school's performance to parents and local communities, as well as for the purpose of overall public accountability.
76. The Council, however, continues to have concerns about proposals to use the School Report Card to meet multiple accountability needs: those of parents, schools, local authorities, school improvement partners (SIPs), government and Ofsted. It is our view that proposals on the type of information to include should be checked against whether they meet, first and foremost, the needs of parents.
77. The rest of this paper is organised under some of the sections of the *Prospectus* document.

Overall rating or score

78. The GTC notes the results of the consultation, which found that 57% of respondents opposed an overall rating or score. The GTC echoes the concerns highlighted in the *Prospectus*, in particular, that an overall rating or score would represent a summative assessment of the school's performance, which would not accurately reflect the school's local context. The effect would be to fail to do justice to a school's performance across a wide range of outcomes.
79. The argument used in support of the proposal is not strong. The GTC rejects the contention that an overall rating or score would help to communicate schools' relative priorities; it is more likely to obscure the relative priorities of a school. It is likely to encourage a focus, not least by the media, on the overall score or rating at the expense of the broader and textured picture of the school's work. As the *Prospectus* rightly says, parents will have different views about what constitutes a good school. They will prioritise different

strengths reflecting the needs, interests and aptitudes of their children. The Report Card should enable parents to have a clear unencumbered view into all aspects of school performance including those which are of particular importance to them. A potentially inaccurate and contrived overall score/rating would only act as a distraction and may hinder the transparency and due accountability that is the Government's aim and the public's right. A Report Card without such a score/rating would meet the primary aim of providing parents with current, accessible, balanced and comprehensive information on a school's performance. Furthermore, research carried out with parents on behalf of the Department for Children, Schools and Families (DCSF) found that the majority preferred the Report Card without an overall score.

80. It is disappointing to hear that despite such lack of support and a clear rationale the Government is still committed to the adoption of an overall score/rating. The Council strongly urges that the pilot be used to trial more than one approach.

Performance categories

81. The GTC welcomes the acknowledgement by the Government of the need to ensure that the titles of the performance categories are accessible and meaningful to parents. Evidence from research carried out with parents on behalf of the DCSF showed that the term 'narrowing the gaps' is not clearly understood¹⁴.
82. The GTC is not convinced by the need to have both a score and a rating for each performance category. The use of a score is relative to each individual category and therefore to compare scores across categories is meaningless. The GTC argues that a stand alone rating for each category will ensure clarity and accessibility for parents and that the DCSF should avoid adopting an approach which encourages spurious statistical comparisons.
83. It is positive that the pilot will consider how staff views or perceptions can be incorporated into the Report Card. The recent Cabinet Office report: *Listening to the front line: Capturing insight and learning lessons in policy making* emphasizes the importance of involving practitioners in the public policy-making process¹⁵. It is essential therefore that school staff have an opportunity to contribute to the evaluative process as a component of the school accountability system.

Year on year comparisons

84. The GTC supports the aim to highlight changes to a school's performance over time and could support the use of arrow symbols indicating the trend

¹⁴ Customer Voice Research (July 2009), School Report Card. Sherbert Research on behalf of the DCSF

¹⁵ Cabinet Office (July 2009), *Listening to the front line: Capturing insight and learning lessons in policy making*

over this period. However, the Council cautions against the inclusion of too much detailed information, which could detract from the overall accessibility of the Report Card.

Contextualisation

85. As previously stated in our original response to the proposals, all indicators used to calculate ratings for performance categories should be contextualised with the flexibility to present further contextual information should the school feel it is relevant¹⁶. The Council is not persuaded by the case in favour of pupil attainment being exempt from contextualisation. The use of 'raw' attainment data will encourage the comparison of schools in a proxy league table, at the expense of the broader picture of schools work. It would compromise the commitment to the aim for the School Report Card to become the main source of school accountability.
86. The proposal to use CVA data is preferable to the use of raw data, notwithstanding the limitations even of CVA in reflecting the contribution of schools making apparently limited progress with the most disadvantaged children and young people.

Pupil well-being

87. As stated in previous advice, individual schools cannot be held accountable for wellbeing outcomes over which they have limited and indirect influence such as child obesity levels or rates of teenage pregnancy. Schools' contribution to these outcomes should be evaluated at a local level. In considering a school's contribution to wellbeing the influence of parents/carers needs to be taken into account¹⁷.
88. Proposals to use specific indicators to measure schools' contribution to wellbeing should be tested against whether they support intelligent accountability – which implies that there are meaningful data on which to draw across the full range of a school's responsibilities. If they cannot fulfil this aim they should be rethought.

Narrowing gaps in pupil performance

89. The GTC welcomes the intention to ensure that schools report on narrowing gaps in pupil performance, but is not convinced that the focus should be purely on poverty and ethnicity at the expense of other groups. Such groups should be determined locally, reflecting the context of the school and the needs and circumstances of their pupils. Given the overall context of the aim to raise standards of attainment and achievement for all it will be important that communications with parents and the wider public make clear that

¹⁶ GTC response to DCSF and OFSTED: A School Report Card – January 2009
GTC response to DCSF/OfSTED: Indicators of a school's contribution to well-being consultation – January 2009

narrowing the gap implies a faster rate of improvement for these groups than others.

SEN and disability

90. Consideration should be given to incorporating 'SEN and disability' in the *Narrowing Gaps in Pupil Performance* category, given Ofsted's greater emphasis on securing progression for those children with SEN and/or disabilities.

Partnership working

91. The Council welcomes the use of the pilot to investigate how schools may report on their contribution to local partnerships. Any proposals should steer away from a reporting requirement which reduces partnership working to a descriptive narrative or counts the number of partnerships with which the school is involved.
92. The National Audit Office (NAO) found that the most effective partnerships were school-initiated. The GTC therefore believes that the emphasis should be on enabling partnership, by removing barriers to collaboration. The Council supports the NAO recommendation that as a rule, schools should have the freedom to determine the form and management of their partnerships for their local context¹⁸.

Coverage

93. The GTC welcomes proposals to investigate how early years and post-16 provision can be incorporated into the SRC. It is important to recognise the significant contribution schools make to the outcomes for children and young people before the age of five and after 16 years old.

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¹⁸ National Audit Office (2009), Partnering for School Improvement