

# Training and Development Agency for Schools (TDA): **draft requirements for the proposed assessment only route to QTS**

## Consultation Response from the General Teaching Council for England

### Introduction

1. The General Teaching Council for England (GTC) is the independent professional body for the teaching profession. Its main duties are to register and regulate the teaching profession and to advise the Secretary of State on a range of issues that concern teachers, teaching and learning. The Council acts in the public interest to contribute to raising standards of teaching and learning and the standing of the teaching profession.
2. The GTC is pleased to respond to the TDA's consultation on the draft requirements for the proposed assessment only route to qualified teacher status (QTS). While the GTC welcomes many of the proposed requirements for the assessment only route, it does have some reservations about the creation of an assessment only route and its scope.
3. The rationale for an assessment only route to QTS is somewhat unclear from the consultation document. The GTC is also unsure as to the number of individuals who are likely to apply for this route and questions whether the assessment only route is intended to create an additional number of individuals gaining QTS each year or whether it will replace some existing provision.
4. The GTC understands that this route is aimed at those who have sufficient expertise and experience. However, we would like to know more about the evidence that will be required from candidates to demonstrate this, including how they are meeting the QTS standards. The GTC believes that evidence evaluating an individual's teaching practice will be essential to the assessment process. Moreover, it suggests that a supervised practice element be considered as part of the route as this would benefit candidates and help assure the quality of those gaining QTS.
5. Care needs to be taken to ensure that the assessment only route is sufficiently rigorous in order to avoid devaluing QTS. The GTC is aware of the previous, no longer available, assessment only route to QTS and is pleased that from

discussions with TDA, the proposed route appears to be more rigorous and is not seen as a quick route to QTS.

### **Requirements for entry to the assessment only route**

6. The GTC welcomes the proposal that all candidates will need to meet the same requirements as those entering a course of initial teacher training (ITT). We also welcome the commitment to equality of access and believe this must remain central to not just the design but to the day-to-day application of this route. We look forward to seeing the equality impact assessment for this route.
7. However, the GTC does have concerns about the role and application of *Fitness to Teach* as we believe it may deter some disabled applicants. The GTC believes that an individual's suitability to teach should be determined by their ability to meet the conduct and competence standards, to support children and young people's learning and achievement, alongside appropriate background checks. Judgements about health or disability should not be an obstacle; rather, reasonable adjustments need to be made that support disabled people to enter and thrive in teaching. The GTC supports the Disability Rights Commission's 2007 report<sup>1</sup> which found that fitness standards "*lead to discrimination; and they deter and exclude disabled people from entry and being retained. We therefore recommend that they are revoked.*"
8. The GTC appreciates the additional eligibility requirements but stresses that the quality of the initial assessment interview is critical. Those accepted for the assessment must be experienced individuals who have the existing skills, expertise and experience to meet the QTS standards. Unless the means of effecting this requirement are applied rigorously and consistently, it is difficult to see how QTS attained through this route will be comparable in standard to QTS attained through existing routes.
9. Moreover, if an applicant is not found suitable for the assessment only route appropriate feedback should be provided which details where the individual is thought to not be meeting the professional standards alongside areas which need to be addressed.
10. If accepted for the route, individuals who are not recommended for QTS following assessment should be given detailed feedback including where they have not met the standards for QTS, where they have not provided suitable evidence, and what action they need to take in order to meet the standards.

### **Quality Assurance**

11. The quality assurance (QA) of the whole process will be critical if it is not to devalue QTS. Both QA of the initial assessment and of the assessment for QTS will be required. In particular, assuring the quality of the recommendation made to award QTS will be critical. Integral to this, robust moderation of judgements and quality assurance of the whole system is needed. QA needs to take place both

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<sup>1</sup> Disability Rights Commission Formal Investigation 2007 into the impact of health standards across nursing, teaching and social work, including Fitness to Teach, on entry to and retention in the teaching profession.

locally in terms of the provider and nationally to assess how the route is functioning as a whole.

12. Given that the route will be self funded, the GTC would question whether there is an expectation of how much providers will be able charge individuals and believes that this must not be seen as a route that “buys” QTS.

### **Provisional registration of candidates**

13. The GTC has discussed with TDA their additional proposal that candidates should be provisionally registered with the GTC, which would bring individuals within the scope of the suitability assessment and the GTC’s Code of Conduct and Practice. The GTC believes that this should be given further consideration. However, existing regulations do not currently support the provisional registration of candidates on the assessment only route. For information, some candidates on the assessment only route may be required to provisionally register if they are working in school as an Overseas Trained Teacher or as an Instructor.

### **Application of the assessment only route**

14. Given that there will be no allocation of places, and the provider can accept as many candidates as they wish and have been deemed suitable for the assessment only route, it is unclear how many people will gain QTS through this route.
15. The GTC would be interested to explore if the assessment only route to QTS could provide a means for appropriately qualified higher level teaching assistants (HLTAs) to gain QTS, given that the HLTA standards are based on the standards for QTS. However, it may be difficult for HLTAs to gain the required experience including having taught in at least two schools prior to their assessment or demonstrate that they have met the QTS standards across two consecutive age ranges.
16. The GTC has previously suggested in its evidence to the Fair Access to the Professions Panel that in order to improve access to the profession and draw from the widest possible pool of applicants, a recognised route from HTLA to QTS should be developed, and so allow HLTAs to progress.
17. The GTC believes that the scope for further education (FE) teachers to gain QTS through an assessment-only route needs to be given greater consideration, including how FE teachers might gain experience of teaching two consecutive age groups perhaps through working in a 14-19 partnership.

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