This document details the position of the Further Education Development Agency (FEDA) regarding 21 issues included in a recent initiative to introduce compulsory initial teaching qualifications into further education (FE) and the requirement that such qualifications should meet national standards. The following are among the positions taken by the FEDA on the 21 issues addressed: (1) FEDA is confident that the proposed skills required of FE teachers reflect those required for initial teacher training as seen by all key stakeholders; (2) teachers in postcompulsory education should themselves be able to demonstrate levels of key skills equivalent to those demanded of teachers in the compulsory sector; (3) all full-time FE teachers should be required to have a threshold qualification; (4) teachers should receive credit for existing qualifications; (5) 2 years seems an appropriate time in which new full-time teachers are expected to achieve a threshold qualification; (6) exemptions from the threshold requirement should be granted to existing unqualified full-time teachers under a narrow set of circumstances; (7) some distinction between the requirements for full-time and part-time teachers should be permitted; and (8) a professional body for FE established by the sector itself is the best means of implementing qualification requirements. (MN)
Compulsory teaching qualifications for FE teachers
1. FEDA is the leading development body for post-16 education and training, focusing on post-16 policy, research and quality improvement. FEDA supports the initiative to introduce compulsory initial teaching qualifications into further education and the requirement that such qualifications should meet national standards. Compulsory teacher education is well established in the school sector and it is appropriate that a similar requirement should apply to the post-compulsory sector. The intention to raise the professional status of FE teachers is welcome and will assist in establishing parity of esteem with school teachers.

2. The proposal seeks to build on current good practice and will eventually benefit all learners. As identified in the consultation paper, initial teacher training requirements and the establishment of a professional institute have complementary roles to play. In addition we would add the requirement for teachers ‘to remain in good standing’ through engaging in regular continuing professional development.

Question 1 | Do the skills set out in Annex A cover in aggregate what a teacher working across a full range of responsibilities should be able to cover in a first full teaching qualification?

3. The FENTO standards were devised through rigorous consultation with practitioners and staff developers across the FE sector. Similarly, the division of the standards into those required for initial and continuing professional development were developed through consensus. We are confident that these skills reflect those required for initial teacher training as seen by all the key stakeholders.

4. However, by presenting only the skills and omitting particularly the professional knowledge and understanding and the set of values that inform the standards, they look both less demanding and less challenging than the complete version of the standards. This might create unnecessary concern about the quality the standards demand. Other responses from the sector will determine whether this is indeed the case.

5. Lastly, the standards will need regular review. We need to recognise that the sector and its requirements are constantly changing – the roles and responsibilities required in, say, five years time may be very different from today. This is particularly the case given the move to a new learning and skills sector where, for example, greater collaborative working is likely to become the norm.
Question 2 | Is the split between the skills an appropriate one for delivering the introductory, intermediate and threshold qualifications?

6. The three stages identified are currently reflected both by the City & Guilds 730 series and many Certificates in Education and PGCE programmes. They offer substantial flexibility, choice and progression opportunities for part-time and potential part-time staff as well as full-time staff. The standards specified for the three levels are appropriate in scope and coverage and reflect the areas in these existing awards. For these reasons we believe the split suggested is appropriate.

Question 3 | Should all qualifications be required to contain elements covering key skills?

7. All teachers need to be aware of the ways in which key skills impact on the programmes of study they deliver and so any initial teacher training should raise this awareness.

8. All programmes of study delivered by FE colleges require some competence in key skills. Hence all teachers need to be aware of the requirements for key skills within their programme areas and address them through their devised programmes of learning. This skill should be developed through initial teacher education.

9. It is also appropriate that teachers in post-compulsory education should themselves be able to demonstrate levels of key skills equivalent to those demanded of teachers in the compulsory sector. If they do not possess this evidence, their initial teacher education programme should signpost opportunities within the programme to obtain it.

Question 4 | Is an intermediate qualification of the full City & Guilds 730 type the right point at which to pitch such a requirement?

10. Custom and practice has established this as an appropriate point at which to pitch the intermediate level. It is well known and understood within and outside the sector and we would welcome such continuity.

Question 5 | Should all full-time FE teachers be required, in principle, to have a threshold qualification?

11. Yes. If we are to raise the teaching standards in post-compulsory education and training, we need to raise the professional status of teachers and trainers and this must at least reflect the practice in schools. All full-time staff in schools are required to have graduate status and qualified teacher status. Achievement of the threshold standards moves us some way towards these goals. This requirement will need to be phased into the sector and the issues addressed through questions 6–9 here offer ways in which this might be achieved.

Question 6 | Should existing provision of a PGCE, B.Ed., Cert. Ed. (FE) provide automatic exemption?

12. The concept of a generic set of skills that all teachers in further education needed to possess was not born with the creation of the FENTO standards. Most qualifications attracting one of the above awards would subsume much of the knowledge, skills and attitudes that the standards now embody. Apart from the impracticality of establishing where each programme might have fallen short and subsequently attempting to fill that gap, most staff will have addressed this through their continuing work-based learning. It seems inappropriate and unrealistic therefore to refuse automatic exemption. There is also the question of funding. It seems realistic to focus funding on those who have no training at all as a first priority.

Question 7 | Should credit be given to existing City & Guilds or other qualifications?

13. For reasons similar to those expressed in Question 6, we would support the idea of offering credit equivalent to that of the intermediate qualification for existing City & Guilds 730 holders. We recognise that this position would not be well received by a minority of higher education providers but the majority have given exemption for the 730 from significant proportions of their Cert. Ed. or PGCE programmes. We believe that this was appropriate and is therefore the most logical and reasonable position to take.
14. Two years is the current most common time span for an in-service Cert. Ed. or PGCE and this seems a reasonable time span under normal circumstances in which to provide evidence of meeting the required standards. There will be circumstances, however, when for reasons beyond the control of the trainee they will need to defer a year. This may be due to a variety of unforeseen circumstances that may be personal or professional. There may also be occasions when it is inappropriate for the trainee to progress immediately to the threshold stage. We would therefore recommend that two years be the normal requirement with the maximum time allocated as three years. This will allow for individuals to defer for a year if they or their tutors feel they would benefit from such an arrangement.

Question 9: Should there be any exemption from the threshold requirement for existing unqualified full-time teachers? If so, what criteria should operate?

15. This is a particularly difficult issue to address. Clearly there is an argument that suggests that all staff should be appropriately qualified and meet the standards set by the FENTO. It is important that all staff should be offered this opportunity. However, staff that have been working effectively within the sector for some years may feel it is inappropriate to embark upon an initial qualification and indeed it may well prove to be a waste of resources.

16. It seems reasonable, however, that if staff are recently new to the sector – perhaps working full-time for three years or less – they should be required to gain an appropriate qualification. Unqualified staff should be able to gain exemption in the following circumstances:

- They have been employed full time for more than three years
- They have demonstrated satisfactory performance through teaching observation and appraisal
- Satisfactory performance is confirmed by their employing college.

17. Until there is a professional body for FE teachers, it is difficult to imagine how this exemption should be obtained unless their employing institution could be called upon to confirm exemption, as they might be to confirm completion of probation.

18. Part-time teachers would be expected normally to follow an in-service programme. In-service by definition requires staff to be teaching a certain number of hours to benefit fully from the programme. Most in-service programmes, pitched at intermediate and threshold equivalents, currently require a minimum equivalent of two hours per week teaching for the duration of their programme in order to apply the knowledge and skills the programme has developed. This will clearly exclude those who do occasional teaching but not on a regular basis. The introductory stage does not normally require any teaching.

19. This custom and practice might well offer a solution in that casual part-time staff could be required to obtain the introductory stage. Regular part-time staff who teach a minimum of two hours a week could be required to gain the intermediate stage and encouraged to progress on a voluntary basis to the threshold stage. Part-time staff who want to secure full-time employment would see advantage in progression, whilst those who do not wish to become full time can remain at the intermediate stage if this is their choice.
Question 13 | Is there a need for a separate set of standards and qualifications for teachers of basic skills?

Please note: As no specific question has been asked about standards and qualification for teachers of students with learning difficulties and/or disabilities, our response is included here.

20. A major thrust of inclusive learning over the past four years has been to emphasise the individuality of learners' requirements and to seek to enable all staff to develop the appropriate skills to support them.

21. It is therefore important that understanding the processes of learning and developing skills in individualising the inclusive learning process is generic across all teacher training. These are fundamental to helping students gain knowledge and skills.

22. Initial teacher education and training for the post-compulsory sector has never been subject specific. Within any teacher training group there may be teachers of A-level Physics, GNVQ Leisure and Tourism, information technology, creative writing and short-mat bowling. The pedagogic skills are fundamentally the same for all groups, and individuals are encouraged through the assessment tasks to contextualise within their own subject fields.

23. There are, however, some differences that lead to additional requirements. Staff teaching subjects, e.g. science or vocational skills (hairdressing), have usually been grounded in the area over a number of years. Their primary requirement is to gain the pedagogic/andragogic skills to aid learning. With respect to the areas of basic skills, ESOL or working with students with learning difficulties or disabilities the orientation is not to a subject, but rather to supporting the development of learning.

24. Historically, there has been a tendency to see these areas as easy to teach because we can all speak, read and write English fluently. The subjects are in fact particularly challenging ones to teach because:
   - Teachers have first to be taught the technical components of listening, speaking, reading and writing (so that they can then assess skill levels, plan suitable programmes, select suitable materials, teach the subject and carry out formative and summative assessment)
   - Students usually have special learning requirements, for example basic skills students may have experienced failure and/or had negative experiences of education in the past, including disaffection and drop-out; ESOL students may have suffered the trauma of relocation, dispersal, health problems, etc.

25. Support for students with learning difficulties and/or disabilities also makes particular demands on teachers who need a greater depth of understanding of the complexity of the processes of learning and the nature of the impact of disability/learning difficulties on learning. Teachers need high levels of skills in individualising the teaching and learning process.

26. Generic teacher training modules are relevant to all teachers whatever their subject. However, in our view, basic skills needs to be taught and practised through specific modules for those whose main teaching role is in the area of basic skills, ESOL or provision for students with learning difficulties and/or disabilities.

27. In addition, bite-sized introductions to each area, including specific learning difficulties such as dyslexia and sensory impairment, need to be embedded in the syllabus for all other teacher training programmes so that mainstream teachers are able to assess needs – as suggested in the consultation document.

28. We would agree that a key strand in the DfEE's basic skills strategy needs to be a coherent framework and new qualifications specifically for basic skills and ESOL teachers, closely aligned to the FENTO standards. This work has already started. The new basic skills qualification is due to be launched in September 2001 and is currently being developed on behalf of the Basic Skills Agency by Cambridge Training and Development and Cambridge Institute of Education. We also consider that standards for staff specialising in teaching students with learning difficulties and/or disabilities should be developed by FENTO, that reflect the current teaching standards but also recognise the need to develop the curriculum focus. Such standards would inform the new qualifications offered.
Question 14 | Should part-time and full-time teachers be qualified to the same stage in basic skills teaching?

29. The key issues in teacher training for part-time basic skills teachers and part-time staff working with students with learning difficulties and/or disabilities are as follows:

- The status of basic skills teaching within institutions/organisations needs to be raised; most teaching is currently carried out by part-time teachers with limited opportunities for participating in training and development.
- Basic skills teachers need better opportunities for both continuous professional development and career progression.
- Part-time teachers must be a central focus of current developments in training and qualifications.
- Discrete basic skills training and qualifications must follow the model of the mainstream framework, with specific modules relevant to the different contexts in which basic skills may be delivered.
- Training and qualifications for teachers working with students with learning difficulties and/or disabilities must also include specific modules related to specialist knowledge and skills to assess and provide support to match the individual needs of disabled learners.

30. Given the need to meet the government's ambitious targets and timescale for improvements in the nation's basic skills levels, we suggest that initially all part-time basic skills teachers are required to achieve the intermediate qualification as a minimum, within the same timescale as full-time teachers. They should be given every encouragement and incentive to achieve the full qualification.

31. As the Basic Skills Strategy unrolls, it may be possible to increase this requirement, i.e. demanding the full qualification for all teachers, in the interest of assuring consistent professional standards across the board.

32. All teachers who are primarily concerned with students with learning difficulties and/or disabilities should, over time, be required to obtain specialist qualifications.

Question 15 | Should a basic skills teaching qualification apply only to teachers who deliver nationally recognised qualifications or to all basic skills teachers across all providers delivering basic skills for learners?

33. The recent government report on basic skills, *A fresh start*, recommends a range of developments in basic skills training in order to tackle the nation's current basic skills crisis. Developments are likely to include the introduction of:

- More basic skills delivered in a work-based context
- More provision delivered in community settings and through voluntary organisations
- 'Brokers', in the community and the workplace, who have day-to-day contact with people who may have basic skills needs, e.g. community workers, trade union reps, housing association workers.

34. The intermediate qualification must be the minimum requirement for any part-time teacher. Whilst the current teaching standards do recognise a variety of contexts, in our view, specific additional modules need to be developed to address different basic skills contexts. These modules should be a requirement for any teacher delivering in a specific context. Modules could include:

- Delivering basic skills in the workplace
- Delivering basic skills in the community
- Brokering basic skills (the Basic Skills Agency is calling this the 'barefoot' basic skills teacher's qualification)
- Delivering additional learning support
- Dyslexia, specific learning difficulties and the impact of disability on learning.

35. There are large numbers of volunteers currently working alongside teachers in basic skills settings. Their training needs must not be ignored – specific modules should be designed as part of the basic skills teacher-training framework.

Question 16 | Should a basic skills teaching qualification apply only to new teachers? If not, what, if any, criteria should apply in relation to exemption and timescale, to existing unqualified teachers?

36. This decision needs to be made in the light of the overall DfEE strategy for basic skills. There is a critical need to retain existing basic skills teachers and recruit large numbers of new teachers.
37. Existing teachers, full and part time, will in any case need to undertake Basic Skills Agency training during the period July 2000 - July 2001 to enable them to deliver the new basic skills 'national curriculum', due to be published in May 2000. It is proposed that this training should provide accreditation towards a qualification.

**Question 17** Should agency teachers be subject to the same qualifications requirement as teachers formally employed by colleges?

38. It is difficult to find a rational argument to justify why agency staff should not be qualified to the same standard as those permanently employed by colleges. If colleges are to feel confident in the use of agency staff, they should feel able to expect the same level of qualifications as held by other staff. If we look to custom and practice in other successful areas, for example nursing, then agency staff in this sector should be expected to hold the same qualifications.

**Question 18** Should a limit of one attempt at their required qualification be imposed in the case of serving teachers? Are there any exceptional circumstances that might be taken into account?

39. Many serving teachers comparatively new to teaching who have sound occupational skills and knowledge and demonstrate sound professional pedagogic practice may have difficulty in meeting programme requirements due to the need to develop sufficient levels of key skills. Occasionally, serving teachers have difficulty in demonstrating sound pedagogic skills. We would suggest therefore that normally serving teachers should have one opportunity to retrieve failure (this is currently the practice on most ITT Certificate programmes). However, if the nature of the failure relates to their classroom practice, and as a consequence seriously jeopardises the quality of the learners' experience, it may be appropriate to withhold the opportunity to retrieve failure.

**Question 19** We would welcome views on the endorsement model in Annex B.

40. The endorsement model is clear and supports other quality assurance mechanisms without too much duplication or excessive bureaucracy. Endorsement should confirm that delivery of the programme allows the standards to be met and that the assessment procedures confirm this.

**Question 20** Do you agree with the proposals that a professional body for further education, established by the sector itself, is the best means of implementing the qualification requirements? If not, what alternative approach do you prefer?

41. Yes. Such a body would need to:
   - Have a registration role
   - Devise a framework for continuing professional development of teachers
   - Publish a list of recognised professional development opportunities and endorse providers
   - Develop a code of professional ethics
   - Have the ability to exclude those who prove unworthy.

42. Such a body would play a key role in the recognition of teacher professionalism and assist in the 'nourishment' of teachers. It is important, however, for the professional body to be seen to be independent of employer-led organisations such as the AoC and FENTO.

**Question 21** What steps should be taken at DfEE, Learning and Skills Council, individual college and other levels to ensure the active promotion of effective professional development?

43. The requirement for qualifications by the DfEE will provide an important impetus. This should be endorsed by funding arrangements to support the acquisition of qualifications.

44. The focus on quality improvement from the LSC will provide a powerful drive in the new competitive learning market. The quality criteria established by the LSC to identify providers eligible for funding could also include the existence of a continuing professional development policy (but would exclude some small voluntary and community providers). Performance indicators could include institutional commitment to CPD.

45. We have suggested that the professional body could also require their individual members to remain in good standing. It could also establish a tariff for a range of development activities and the national qualifications could be integral to the tariff.

46. The inspectorate could also create a range of levers to promote and monitor CPD actively within institutions.

47. FEFA would see its role as spreading best practice across the LSC sector as well as offering continuing professional development based on the FENTO standards.
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