



UCAC's response to the DCSF's Consultation on "*a licence to practise*"

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1. Introduction

- 1.1 UCAC welcomes this opportunity to contribute to the consultation on introducing a *Licence to Practise* for teachers in England, as outlined in the text of the 21st century schools white paper, “*Your child, your schools, our future*”.
- 1.2 UCAC recognises the need for all teachers to keep their skills up to date and is in favour of an “entitlement” to CPD for all teachers. However, we do not believe that introducing a *Licence to Practise* would improve the skills of teachers or the amount or quality of provision for Continual Professional Development.
- 1.3 UCAC is totally opposed to the idea of a “*licence to practise*,” for a number of reasons, as outlined below.

2 Comparisons with other professions

- 2.1 UCAC believes that teaching should be regarded as a high status profession and rewarded as such.
- 2.2. Within today’s society, however, teaching is not viewed in the same way as the legal profession or the medical profession. Comparisons are therefore not valid. Teachers are not afforded the same opportunities as “*other high status professions*,” in terms of status and pay.
- 2.3 Teachers already face regular Inspections, have an annual appraisal as part of the Performance Management system which means they have targets to achieve and are more answerable on a day to day basis than any other profession. Teachers are more accessible to the general public (their “clients”) than any other profession. It is far easier for parents or children to complain about the performance of a teacher than it is for a patient or a client to complain about a doctor or a solicitor. It is far easier, therefore, for any potential problems to come to light at an early stage.

3 Renewing the licence periodically - 5 year validity period

- 3.1 The need to renew the licence periodically (every 5 years) will put an added pressure on teachers and their line managers, will introduce another layer of bureaucracy and will waste badly needed resources within the education system. The notion of a 5 year validity period is totally unacceptable.
- 3.2 There are no details here of how the revalidation process would work. What if signs of the need for improvement were identified? Would there be support? Would there be a guarantee of financial support to ensure that the teacher could attend suitable training courses? If a licence wasn’t reissued, what would happen? Would the school have to take the teacher through capability measures? What would happen if the teacher had been denied

access to relevant CPD due to funding problems – who would be blamed? What steps would be taken to ensure that the teacher would be treated fairly? What if the Inspection Framework identified no issues but the *Licence to Practise* did – or vice versa? Which would take precedence?

- 3.4 There are serious issues concerning how the *Licence to Practise*,” would link in with the school’s Performance Management arrangements and the Inspection framework? At a time when a key aim within the education system is to ensure the best use of scarce resources by encouraging collaboration and avoiding duplication, there is a serious danger here of creating an unnecessary system. There are plenty of systems in place to ensure that practising teachers are capable. Introducing a *Licence to Practise* will achieve nothing; it will create insecurity for those within the workplace and those returning to teaching – and waste valuable time and money.

4 Resources

- 4.1 If such a scheme is introduced in England for September 2010, it will redirect badly needed resources at a time when the education budget is likely to be severely over stretched.
- 4.2 In terms of accessing opportunities for professional development, if teachers in England find themselves in a similar position to teachers in Wales, they are very lucky if their school can allow them to attend one course per year, due to the poor level of funding for CPD. This situation is likely to deteriorate in 2010-2011, if the predictions of a very tight financial settlement are confirmed.
- 4.3 It would be highly unfair to base the *Licence to Practise* on the recent opportunities for professional development available for teachers. Teachers most often have little control over their own training opportunities, as money is such an important factor. Those who work in the most disadvantaged areas will undoubtedly have even less opportunities for CPD.
- 4.4 Such a scheme is likely to impoverish the teaching profession rather than enrich it, by using valuable resources for its implementation which could be used directly on CPD for teachers.

5 Supply teachers and those who are returning to the classroom

- 5.1 UCAC believes that those who have been away from the classroom for a while, and those who are working as supply teachers, need support to access suitable courses / training, but introducing *Licence to Practise* is likely to make the whole process of returning to the classroom far more

intimidating. If returning to teaching after a break, will teachers need a licence before they can apply for a teaching post?

- 5.2 Who will fund courses for those returning to teaching who are seeking to update their information / skills before applying for jobs?
- 5.3 Who will fund courses for those supply teachers who are working through agencies or who provide short term supply work in schools?

6 Other issues

- 6.1 The timetable is also very ambitious. The GMC has already consulted on a *Licence to Practise* for doctors (formal consultation ending April 2009) and it is not intended to implement the scheme until 2011 and, even then, to do so as a pilot, with volunteers. Roll out will be incremental so that the GMC can learn from their early experiences. They have not set a date at this stage for when it will become compulsory for those who want to carry out all the functions of a doctor to become licensed.
- 6.2 There are possible workload issues and issues of duplication within the system. School Managers and Middle Managers are already dealing with Performance Management arrangements on a regular basis; why add to these burdens instead of allowing them time and money to carry out these functions properly?
- 6.3 There are already plenty of structures within the education system to ensure that incompetent teachers are dealt with:
 - after qualifying as a teacher they need to satisfy the demands of the induction period
 - they are already regularly assessed through Performance Management arrangements
 - they are inspected every six years
 - they can be held back on a pay grade, unless the school is happy with their performance
 - when they reach M6 they need to be able to prove they have very high level skills before they can move on to the Upper Pay Scale
 - they can be put on capability measures
 - the GTCW/GTCE assesses their initial and ongoing suitability to be a teacher
 - there are Core Standards and 3 different Pay Standards as well as the GTCW/E Professional Standards

Do we need yet another way to measure the competency of teachers?

The profession has nothing to gain from another set of criteria. It will be a waste of time and a waste of money!

What we do need is enough money to support an appropriate and effective CPD programme for all teachers. According to the GMC, CPD for doctors should:

“Encourage and motivate doctors to learn. It should be closely related to each doctor’s individual needs, ambitions and personal learning styles. The focus on the doctor’s learning needs will support changes and improvements in practice.”

This is what teachers do not have – and what they need.

- 6.4 The introduction of Rarely Cover (September 2010) with all its attendant costs is likely to worsen rather than improve the situation of ensuring up to date training for all teachers. The costs of covering for absent teachers will affect management decisions concerning releasing members of staff for training.
- 6.5 The cuts in public sector funding that are likely in the next financial year will only add to the difficulties. Why waste what little resources we have on a system that will not benefit anyone? It would be better to enshrine CPD as a right for all teachers and ensure that CPD funding is realistic and fair and that schools’ Performance Management systems cater effectively for CPD needs.

UCAC (Undeb Cenedlaethol Athrawon Cymru)

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