

## Annex

# Proposal for the registration of work based learning practitioners with the Education Workforce Council: Full list of respondents and published responses

### List of respondees

<u>Name</u>	<u>Organisation</u>
Paul Napier	Rathbone Training
Jack Marsh	XR Training
Mark Evans	Estyn
Arwyn Watkins	Cambrian Training Company
Kenneth Muir	General Teaching Council for Scotland (GTCS)
Siân Rees	Institute of Directors Wales
Hayden Llewellyn	Education Workforce Council (EWC)
Jeff Protheroe (on behalf of NTfW)	National Training Federation for Wales (NTfW)
Angharad Starr	Mudiad Meithrin
Michelle Reeve	Organisation: UNISON – Cardiff Branch
Ms Chris Keates	NASUWT Cymru
Roberta Hayes	Care Council for Wales
Tim Pratt	ASCL Cymru (Association of School & College Leaders)
Rob Williams (Director of Policy)	NAHT Cymru
Mary van den Heuvel	ATL Cymru
Allison Jones	North Wales Training Ltd
Sarah John	Acorn Learning Solutions Ltd
Rebecca Williams	UCAC (Undeb Cenedlaethol Athrawon Cymru)

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### Published responses

Below are all the responses from the respondents who have agreed for their comments to be published. These responses are published in the language that they were received in.

#### CR01

Name: Paul Napier

Organisation: Rathbone Training

**Question 1-** Do you agree with the proposal that a requirement to register will fall on Work Based Learning practitioners who work in a training and learning capacity through a Welsh Government contracted Work Based Learning provider, as set out in paragraph 6.2?

*Agree*

#### **Supporting Comments**

*While I agree with the registration, I would expect the registration fee to be subsidised by DFES or SHELL*

**Question 2 -** Paragraph 6.10 identifies job roles/ titles that will not be required to register with the Council.

Are there any other job title/roles you feel should be exempt from registering with the Education Workforce Council under the category of 'Work Based Learning practitioner'?

*Centre Reception or administration staff*

*Senior Management*

*Internal & External Verifiers*

**Question 3 –** Paragraph 6.8 lists the specific Work Based Learning practitioner roles that we consider should be required to register. Are there any other roles that are not captured who you feel also fit within the description of a Work Based Learning practitioner?

*Engagement Officer*

*Induction Officer*

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**Question 4** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

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**CR02**

Name: JACK MARSH

Organisation: XR TRAINING

**Question 1-** Do you agree with the proposal that a requirement to register will fall on Work Based Learning practitioners who work in a training and learning capacity through a Welsh Government contracted Work Based Learning provider, as set out in paragraph 6.2?

*Agree*

***Supporting comments***

*Registration would be good for quality and also another tool for safeguarding*

**Question 2 -** Paragraph 6.10 identifies job roles/ titles that will not be required to register with the Council.

Are there any other job title/roles you feel should be exempt from registering with the Education Workforce Council under the category of 'Work Based Learning practitioner'?

*Many organisations have practitioners that are required to operate in more than one capacity such as assessors and internal verifiers, registration should cover both roles even if the practitioner only occasionally assesses learner work. If Iv's were not required to register the this would be a grey area and a loophole.*

**Question 3**

Paragraph 6.8 lists the specific Work Based Learning practitioner roles that we consider should be required to register. Are there any other roles that are not captured who you feel also fit within the description of a Work Based Learning practitioner?

*None*

**Question 4** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

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*Are WBL contract holders and their subcontractors going to be held accountable for the costs of registration or will this fall to the individual*

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### **CR03**

Name: Mark Evans

Organisation: Estyn

**Question 1** - Do you agree with the proposal that a requirement to register will fall on Work Based Learning practitioners who work in a training and learning capacity through a Welsh Government contracted Work Based Learning provider, as set out in paragraph 6.2?

*Agree*

#### **Supporting Comments**

*Workforce registration should apply to all practitioners whose job it is to deliver training to learners. Registration would raise the status of these staff, who make a very valuable contribution to developing the workforce.*

*Learners in all sectors of education and training are entitled to have confidence in a highly skilled and well-regulated education workforce. Workforce registration will hopefully lead to improved equality between teachers, tutors, trainers and assessors.*

*However, clear professional standards would need to be established with associated continual professional development (CPD). Many trainers and assessors have gained a wide range of teaching and training qualifications. Workforce registration would help to give recognition to the work of the profession as well as developing the skills of staff across the sector.*

*It is essential that any professional standards are clear and progressive and that staff are appropriately matched to the standards based on their skills, experience and qualifications. It is also essential that experience is recognised as well as qualifications.*

**Question 2** – Paragraph 6.10 identifies job roles/ titles that will not be required to register with the Council.

Are there any other job title/roles you feel should be exempt from registering with the Education Workforce Council under the category of 'Work Based Learning practitioner'?

*No further comment*

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**Question 3** Paragraph 6.8 lists the specific Work Based Learning practitioner roles that we consider should be required to register. Are there any other roles that are not captured who you feel also fit within the description of a Work Based Learning practitioner?

*Registration is essential for the key practitioner roles of trainer, assessor, mentor and learning coach. However, all staff that have direct contact with learners need to be registered. Across training providers a wide range of job titles are used for similar roles. These job titles do not always clearly match those stated above.*

**Question 4** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*No further comment*

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**CR04**

Name: Arwyn Watkins

Organisation: Cambrian Training Company

**Question 1** – Do you agree with the proposal that a requirement to register will fall on Work Based Learning practitioners who work in a training and learning capacity through a Welsh Government contracted Work Based Learning provider, as set out in paragraph 6.2?

*Agree*

***Supporting comments***

*Yes we agree in principle with the proposal as set out in paragraph 6.2*

**Question 2** – Paragraph 6.10 identifies job roles/ titles that will not be required to register with the Council.

Are there any other job title/roles you feel should be exempt from registering with the Education Workforce Council under the category of 'Work Based Learning practitioner'?

*We believe that you have gone too wide in your exclusions in particular Internal Quality Assurance who in many Work Based Learning organisations are professional practitioners of Educations and Training*

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**Question 3** – Paragraph 6.8 lists the specific Work Based Learning practitioner roles that we consider should be required to register. Are there any other roles that are not captured who you feel also fit within the description of a Work Based Learning practitioner?

*We have considered this in great depth and we hope that within this you will capture both Middle and Senior Managers who might not be directly delivering, but are professionals in the field of Education and Training and see EWC as their professional body for both registration and CPD.*

**Question 4** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*As an employer within this sector, we really welcome this approach and we hope that this will not only give the workforce professional status and maintain public trust, but also give employers assurance on the future recruitment within this sector*

*So following on from that position can you provide clarity on the payment of the registration fee?*

*Who is going to pay the fee?*

*Is the fee transferable between employers?*

*As an employer do we have access to the CPD records of registered staff?*

*What level of support will be available to employers from EWC in their recruitment for roles considered for registration?*

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**CR05**

Name: KENNETH MUIR

Organisation: GENERAL TEACHING COUNCIL FOR SCOTLAND (GTCS)

**Question 1** – Do you agree with the proposal that a requirement to register will fall on Work Based Learning practitioners who work in a training and learning capacity through a Welsh Government contracted Work Based Learning provider, as set out in paragraph 6.2?

*Agree*

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### **Supporting comments**

*Important in providing public confidence and reassurance in the education profession. Wales and the Education Workforce Council (EWC) are leading the world in setting this expectation and are to be commended for doing so.*

**Question 2** – Paragraph 6.10 identifies job roles/ titles that will not be required to register with the Council.

Are there any other job title/roles you feel should be exempt from registering with the Education Workforce Council under the category of ‘Work Based Learning practitioner’?

*None*

**Question 3** – Paragraph 6.8 lists the specific Work Based Learning practitioner roles that we consider should be required to register. Are there any other roles that are not captured who you feel also fit within the description of a Work Based Learning practitioner?

*None*

**Question 4** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

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### **CR06**

Name: Siân Rees

Organisation: Institute of Directors Wales

**Question 1** – Do you agree with the proposal that a requirement to register will fall on Work Based Learning practitioners who work in a training and learning capacity through a Welsh Government contracted Work Based Learning provider, as set out in paragraph 6.2?

*Agree*

### **Supporting comments**

*It is essential that all those involved in the education and training of people in a work-based environment are equally as qualified as those employed in more traditional settings e.g. schools, FE colleges. Registration alone however is insufficient to ensure quality. There must be the same rigour applied regarding qualifications, professional standards and CPD as you would find in mainstream education and other professions such as accountancy.*

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**Question 2** – Paragraph 6.10 identifies job roles/ titles that will not be required to register with the Council.

Are there any other job title/roles you feel should be exempt from registering with the Education Workforce Council under the category of ‘Work Based Learning practitioner’?

No

**Question 3**– Paragraph 6.8 lists the specific Work Based Learning practitioner roles that we consider should be required to register. Are there any other roles that are not captured who you feel also fit within the description of a Work Based Learning practitioner?

No

**Question 4** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*This is a huge opportunity to ‘professionalise’ the training and coaching (as opposed to the education) communities.*

*Rigorous standards must be defined as conditions for registration with requirements for performance assessment, CPD, etc.*

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### CR07

Name: Hayden Llewellyn

Organisation: Education Workforce Council (EWC)

**Question 1** – Do you agree with the proposal that a requirement to register will fall on Work Based Learning practitioners who work in a training and learning capacity through a Welsh Government contracted Work Based Learning provider, as set out in paragraph 6.2?

Agree

### Supporting comments

*The Council notes that the Welsh Government consulted in 2012 on whether Work Based Learning (WBL) practitioners should be required to register with a professional body and that the majority of respondents were in favour of this proposal. The Council has also been working closely with the National Training Federation for Wales (NTFW), Colleges Wales and individual WBL providers over the last 2 to 3 years and is aware that there is strong support for registration.*

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*The Council is clear that the proposed registration requirement will only fall on practitioners who provide training and learning services through a Welsh Government contracted or subcontracted WBL provider. The Council believes that this approach is proportionate, but highlights that other WBL practitioners who operate outside of the national contracts may register voluntarily, if they wish to.*

**Question 2** – Paragraph 6.10 identifies job roles/ titles that will not be required to register with the Council.

*Are there any other job title/roles you feel should be exempt from registering with the Education Workforce Council under the category of 'Work Based Learning practitioner'?*

*The Council is aware from recent meetings and presentations it has undertaken on behalf of NTFW that there is a strong view that internal and external quality assurance staff should be able to register voluntarily with the EWC. One of the main reasons for this is that such staff will have management or mentoring responsibilities for WBL practitioners who will be required to register. The proposed legislation will not prevent such persons from registering voluntarily.*

*The Council does not identify other job titles / roles it believes should be exempt from registration.*

**Question 3** – Paragraph 6.8 lists the specific Work Based Learning practitioner roles that we consider should be required to register. Are there any other roles that are not captured who you feel also fit within the description of a Work Based Learning practitioner?

*The Council considers that the four roles listed in paragraph 6.8 are the main ones that should be required to register. However, the Council is mindful that in practice providers may use different job titles. It will therefore make clear in its registration guidance that the key criterion for registration is what an individual WBL practitioner actually does rather than their job title. The Council has provided advice of this nature to employers of registrants in other registration categories.*

**Question 4** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*No further comments*

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### CR08

Name: Jeff Protheroe (on behalf of NTfW)

Organisation: National Training Federation for Wales (NTfW)

**Question 1** – Do you agree with the proposal that a requirement to register will fall on Work Based Learning practitioners who work in a training and learning capacity through a Welsh Government contracted Work Based Learning provider, as set out in paragraph 6.2?

*Agree*

#### **Supporting comments**

*NTfW fully support the concept of all those individuals involved in the delivery of Welsh Government contracted work based learning provision (including sub-contracted provision at any level) to fall within the requirement for registration with the education Workforce Council (EWC). The NTfW strongly believes that this will be the first step to recognising the professionalism of the work based learning (WBL) workforce, and allow the opportunity for more effective workforce planning and development.*

*In addition, the NTfW feels that the requirement for practitioners (as outlined above) to be registered with the EWC will strengthen the reputation of the WBL sector in Wales and, more importantly, give a greater level of assurance to the Welsh public that any investments made by the Welsh Government in work-based learning (in all its forms) is delivered by a regulated and professional workforce.*

**Question 2** – Paragraph 6.10 identifies job roles/ titles that will not be required to register with the Council.

Are there any other job title/roles you feel should be exempt from registering with the Education Workforce Council under the category of 'Work Based Learning practitioner'?

*The NTfW believes that the roles identified i.e. Internal and External Quality Assurance (IQA/EQA) are critical to the overall success of quality teaching and learning with the work-based learning sector.*

*Invariably, the route to these roles is through the practitioner roles as identified in paragraph 6.8 of the consultation document, and therefore all IQAs and EQAs will, in the fullness of time, be registered with the EWC as standard.*

*However, we would be keen to see the opportunity for registration to be opened up (on a voluntary basis) for those IQAs/EQAs who are currently in these posts, but who do not have a caseload of learners. It is felt strongly by*

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*the Network that this opportunity will allow those individuals, who have mentoring responsibilities for the WBL practitioners identified, to have the access to the same level of professional recognition and development.*

*The NTfW recognises that the above will quite easily be achieved for IQAs (who are employed by WBL providers) but less so for EQAs (who are employed by Awarding Organisations) However, the NTfW is keen to assist the EWC in promoting our view to Awarding Organisations who have a footprint in Wales.*

**Question 3** - Paragraph 6.8 lists the specific Work Based Learning practitioner roles that we consider should be required to register. Are there any other roles that are not captured who you feel also fit within the description of a Work Based Learning practitioner?

*In addition to the points made above, the NTfW agrees with the requirement for those individual roles listed in paragraph 6.8 to be registered with the Education Workforce Council.*

**Question 4** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*Through dialogue with the NTfW membership, it is clear that there is a great appetite for the registration of practitioners within the WBL workforce. In addition, there has been the call for others, most notably senior managers within providers, to have the option of registering with the EWC, as this is seen as being a commitment to driving forward the professionalism and development of the whole WBL workforce.*

*The NTfW are aware that a further consultation on the costs of registration will soon be launched, and as such, the NTfW and its members stand by to support the Welsh Government and the EWC in arriving at a position, which is suited to all.*

*In previous responses to consultations in this regard, we have outlined that the NTfW agrees with the principle that the fee level should be set as to reflect the varying salary scales across the whole education workforce. Furthermore, we have outlined that we feel that in a situation where individual practitioners (or indeed their employers) need to fund the EWC directly, then the model adopted needs to be fair and equitable. As such, the NTfW believes that it is right that the registration fee is the same for all staff working within the education workforce, and that the current subsidy (paid by Welsh Government to Local Authorities) should be redistributed directly to the EWC, in order that it can be allocated fairly to support those practitioners who are paid less.*

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### CR09

Enw: Angharad Starr

Sefydliad: Mudiad Meithrin

**Cwestiwn 1** - A ydych yn cytuno â'r cynnig y bydd y gofyniad i gofrestru'n berthnasol i ymarferwyr Dysgu Seiliedig ar Waith sy'n darparu **gwasanaethau hyfforddi a dysgu drwy ddarparwr Dysgu Seiliedig ar Waith** a gaiff ei gontractio gan Lywodraeth Cymru, fel y nodir ym mharagraff 6.2?

*Cytuno*

#### **Sylwadau ategol**

*Cytunwn gyda'r cynnig y bydd y gofyniad i gofrestru â Chyngor y Gweithlu Addysg yn berthnasol i ymarferwyr Dysgu Seiliedig ar Waith a gaiff eu contractio gan Lywodraeth Cymru. Serch hynny, pwysleisiwn yr angen i sicrhau bod y broses cofrestru yn un hawdd i'w ddilyn i'r sawl fydd yn ddarostyngedig iddi. Cynigiwn y bydd angen sicrhau opsiynau cofrestru amlwg i'r gweithlu Dysgu Seiliedig ar Waith, yn enwedig gan gall fod angen i unigolyn cofrestru gyda Chyngor y Gweithlu Addysg ar gyfer nifer o wahanol 'swyddi', gan gall un unigolyn fod yn gyfrifol am swyddogaethau Asesydd, Hyfforddwr a Mentor fel rhan o'u gwaith.*

*Teimlwn fod angen sicrhau hyrwyddo'r angen i gofrestru ar gyfer cyflawni'r gwaith a nodir ym mharagraff 6.2 i bob darparwr sydd yn gweithio yn y maes, nid yn unig y sawl sydd yn ddarparwr presennol Dysgu seiliedig ar Waith a gaiff ei gontractio gan Lywodraeth Cymru.*

**Cwestiwn 2** – Mae paragraff 6.10 yn nodi'r rolau/teitlau swyddi na fydd yn ofynnol iddynt gofrestru â'r Cyngor.

A oes unrhyw deitlau swyddi/rolau eraill a ddylai, yn eich barn chi, gael eu heithrio rhag gorfod cofrestru a Chyngor y Gweithlu Addysg dan y categori 'ymarferwr Dysgu Seiliedig ar Waith'?

*Noder ym mharagraff 6.10 na fydd gofyn i Swyddogion Sicrhau Ansawdd Mewnol / Allanol cofrestru â Chyngor y Gweithlu Addysg. Er nad ydynt yn ddarparwr Dysgu Seiliedig ar Waith, teimlwn y byddai gofyn iddynt gofrestru yn gosod sylfaen gadarn fel rhan o strwythur ehangach Llywodraeth Cymru i wella ansawdd a chodi safonau ar draws y sector ôl-16. Mae gan y Swyddogion Sicrhau Ansawdd rôl allweddol yn nyfarniad credydau a chymwysterau Dysgu Seiliedig ar waith, a chynigiwn ei fod yn bwysig eu bod yn cael eu gweld ar yr un lefel proffesiynol a'r sawl sydd yn darparu'r cyrsiau ac yn cefnogi'r dysgwyr yn uniongyrchol.*

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**Cwestiwn 3** – Mae paragraff 6.8 yn rhestru'r rolau penodol ymhlith ymarferwyr Dysgu Seiliedig ar Waith yr ydym o'r farn y dylai fod yn ofynnol iddynt gofrestru. A oes unrhyw rolau eraill na chânt eu nodi y mae'r disgrifiad o ymarferwr Dysgu Gydol Oes yn berthnasol iddynt yn eich barn chi?

*Gweler ateb C2 uchod.*

**Cwestiwn 4** – Rydym wedi gofyn nifer o gwestiynau penodol. Os oes gennych unrhyw faterion cysylltiedig nad ydyn ni wedi mynd i'r afael â nhw, defnyddiwch y lle hwn i wneud hynny.

*Ym mharagraff 5.4 noder nifer o fanteision cofrestru ar gyfer yr unigolion. Cytunwn gyda'r nod o broffesiynoli'r gweithlu er mwyn gwella ansawdd a chodi safonau ar draws y sector ôl-16. Serch hynny, teimlwn y bydd angen cynnwys mwy o fanylder ar gyfer y darparwyr Dysgu Seiliedig ar Waith er mwyn sicrhau'r nodau uchod. Cynigiwn y bydd angen amlygu'r cymwysterau angenrheidiol ar gyfer unigolion sydd am gofrestru ar gyfer cyflawni'r gwahanol swyddogaethau (Hyfforddwr, aseswr, Hyfforddwr Dysgu, Mentor ayb). Yn atodol, cynigiwn fod angen datblygu meini prawf clir ar gyfer sicrhau bod unigolion yn bodloni'r safonau penodol ar gyfer dod yna elod a pharhau'n aelod o'r proffesiynau dan sylw.*

*Cynigiwn y byddai angen amlygu unrhyw gymwysterau angenrheidiol y byddai disgwyl i unigolion fod wedi eu cyflawni, gan ystyried cynnwys cyfnod pontio i aelodau presennol o'r gweithlu gwblhau'r cymwysterau hynny. E.e. a fydd hi'n angenrheidiol i'r sawl sydd yn cofrestru fel Aseswr fodd yn maeddu ar gymhwyster asesydd?, ac os felly pa gymwysterau fydd yn angenrheidiol?*

*Teimlwn yn gryf fod angen sicrhau cysylltu â chyfathrebu'r gofynion hyn i bob darparwr sydd yn gweithio yn y maes ac yn hyfforddi cyrsiau Dysgu Seiliedig ar Waith, er mwyn codi ymwybyddiaeth ar draws y sector o'r gofynion. Cytunwn fod angen adnabod y darparwyr gwasanaeth y bydd yn ofynnol iddynt gofrestru cyn Ebrill 2017. Teimlwn hefyd y dylid galluogi darparwyr eraill sydd am ddangos eu bod yn ymrwymo i ddarparu gwasanaeth o'r safon uchaf posib i'r dysgwyr i wneud hynny.*

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### CR10

Name: Michelle Reeve

Organisation: UNISON – Cardiff Branch

**Question 1** – Do you agree with the proposal that a requirement to register will fall on Work Based Learning practitioners who work in a training and learning capacity through a Welsh Government contracted Work Based Learning provider, as set out in paragraph 6.2?

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*Agree*

### **Supporting comments**

**Question 2** – Paragraph 6.10 identifies job roles/ titles that will not be required to register with the Council.

Are there any other job title/roles you feel should be exempt from registering with the Education Workforce Council under the category of 'Work Based Learning practitioner'?

*No, I think the criteria is accurate.*

**Question 3** - Paragraph 6.8 lists the specific Work Based Learning practitioner roles that we consider should be required to register. Are there any other roles that are not captured who you feel also fit within the description of a Work Based Learning practitioner?

*Librarian.*

*Librarians may help with year 6 – 7 transition and also offer reading clubs/groups/spelling bees etc*

**Question 4** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

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**CR11**

Name: Ms Chris Keates

Organisation: NASUWT Cymru

**Question 1** – Do you agree with the proposal that a requirement to register will fall on Work Based Learning practitioners who work in a training and learning capacity through a Welsh Government contracted Work Based Learning provider, as set out in paragraph 6.2?

*Neither agree nor disagree*

### **Supporting comments**

The NASUWT has no alternative other than to remain neutral over this proposal for the reasons set out in paragraphs 3 to 7 below.

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- 3 *The NASUWT questions seriously the notion that registration with the EWC enhances the status of the various categories of registrants.*
- 4 *Regrettably, experience demonstrates that, for example, the former regulatory body, the General Teaching Council for Wales (GTCW), was more concerned with the generation of publicity over Professional Conduct and Professional Competence Hearings than protecting schools and the teaching profession from adverse and unnecessary publicity. This approach only served to denigrate and demoralise the teaching profession. The Union has no reason to believe that the EWC will act differently.*
- 5 *Consequently, the NASUWT maintains that there is more likelihood of the status of work-based learning practitioners being tarnished, rather than enhanced, by the EWC.*
- 6 *The NASUWT notes that under the proposals only the work-based learning practitioners, who are at the point of delivery, will be subject to the EWC Professional Code of Conduct and Practice (PCCP). Consequently, those who manage, or are otherwise in positions of scrutiny over the work of the work-based learning practitioners, such as quality assurers or inspectors, will not have their professional and private lives policed to the same degree. The Union maintains that this has the potential to create an inequality that could allow those in positions of authority to act with impunity.*
- 7 *The NASUWT has maintained consistently that all those who work in the field of education, including college principals, Estyn Inspectors, challenge advisers, line-managers and administrators, should be subject to the EWC PCCP.*

**Question 2** – Paragraph 6.10 identifies job roles/ titles that will not be required to register with the Council.

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Are there any other job title/roles you feel should be exempt from registering with the Education Workforce Council under the category of 'Work Based Learning practitioner'?

*The NASUWT maintains that the proposals are misconceived as they focus only on those required to deliver education and training and exempts those with managerial or quality assurance responsibilities. See 3-7 above.*

**Question 3** - Paragraph 6.8 lists the specific Work Based Learning practitioner roles that we consider should be required to register. Are there any other roles that are not captured who you feel also fit within the description of a Work Based Learning practitioner?

*See above*

**Question 4** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*The NASUWT expects due regard to be given to reducing the registration fee as the number of registrants increases*

*Further, the NASUWT remains of the view that as registration is a condition of employment, then the payment of the registration fee should fall on the employers not on the registrants*

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### CR12

Name: Roberta Hayes

Organisation: Care Council for Wales

**Question 1** – Do you agree with the proposal that a requirement to register will fall on Work Based Learning practitioners who work in a training and learning capacity through a Welsh Government contracted Work Based Learning provider, as set out in paragraph 6.2?

*Agree*

### Supporting comments

*The Care Council for Wales ('the Council') supports the principal of registering the work based learning workforce. However, we believe that limiting it to practitioners on Welsh Government funded programmes will miss a large number of such practitioners in a number of sectors, including the health and social care. This has the potential to create a two tier system for work based*

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*learning providers and practitioners, similar to that in education and teaching with the maintained and non-maintained sector which existed until recently. The Council would wish to see such a division avoided from the outset of what is otherwise a very positive initiative.*

*The document seems to have a slight bias on improving skills for young people (e.g. section 3, para 4.3, 6.9). Though this is a vital outcome of the extension to registration, work based learning happens at all ages in our sector, whether funded from education and skills programmes or not. It is central to the delivery of high quality social care and early years services. All assessors make a contribution to that process. Providing the chance for work based learning practitioners who do not participate in any government funded programmes schemes to become recognised, registered practitioners will further recognise the importance of this kind of learning. It will enhance the objectives set out at paras 1.4 and 4.2 for the whole workforce.*

*The narrative within Section 3 of the consultation document, does not appear to recognise that the statutory sector (e.g. local authorities or health boards) may have significant numbers of work based learning practitioners, specifically WBL assessors. They make valuable contributions to the learning and skills of the staff of their employers. This is repeated in smaller numbers in voluntary or third sector organisations and in the independent sector to some extent. .*

*These groups of work based learning practitioners are often hidden from educational input, support or scrutiny. They have no Estyn Inspections or CPD opportunities from organisations such as Colegau Cymru or National Training Federation for Wales. Registration offers them the opportunity to demonstrate their professionalism, suitability and their standards of conduct training and development in relation to their educational input. They rely currently on the awarding organisations, their employers and any sector specific support offered e.g. by the Care Council for Wales. In order to promote parity of esteem between FE and work based learning practitioners (para 4.1) it is important for all of these workers to be registered. The Council further considers it significant that they have the opportunity to register with the EWC and have their practice regulated in the same way as practitioners who deliver the same learning through skills funded programmes. This will support EWC in achieving the objective of disseminating advice, guidance and best practice (para 5.1); to support initiatives across the whole of the sector and to offer additional opportunities to proliferate creativity, innovation and inspiration (para 4.4) to a wider group of work based learning practitioners.*

*We notice that the document indicates that apprenticeships are available at levels 2, 3 and 4. However apprenticeships can extend to levels 5 (we have 3 frameworks currently at this level) and even level 6. The registration of work based learning practitioners delivering at these higher level skills areas is particularly important, since people qualifying at these levels are the leaders and managers of our sector. Anything that supports the quality improvement of learning and assessment of these vital workers supports the*

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*professionalisation of the social care and early years workforce in Wales. Perhaps even more importantly it contributes to the improvement of services to citizens of Wales. This is a key government policy objective in Building a Brighter Future and Social Services for Wales: A Framework for Action, now being delivered through legislation such as the Social Services and Wellbeing (Wales) Act 2014.*

**Question 2** – Paragraph 6.10 identifies job roles/ titles that will not be required to register with the Council.

*The Council can think of no job titles/roles that should be excluded from registration.*

Are there any other job title/roles you feel should be exempt from registering with the Education Workforce Council under the category of ‘Work Based Learning practitioner’?

**Question 3** - Paragraph 6.8 lists the specific Work Based Learning practitioner roles that we consider should be required to register. Are there any other roles that are not captured who you feel also fit within the description of a Work Based Learning practitioner?

*The Council notes that standards verifiers, such as External Quality Assessors and Internal Quality Assessors have been excluded from the registration process. While it is true they are not directly involved with the learning and assessment of learners, they make judgements on professional roles, practices and outcomes of those who are. As such they have an influential role in improving the quality standards of learning and assessment.*

*In all other branches of education where registration already exists, such as teaching and FE provision, the people making these judgements both internally and externally are very likely to already be registered, since they will be teachers or FE lectures/tutors in their own right. This decision appears to exclude a critical part of the WBL system in vocational education, who are perhaps most likely to drive the creativity, innovation and inspiration that lies behind this initiative and therefore to assist EWC to achieve this objective.*

**Question 4** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*It will be important for the EWC to work closely with others on this important agenda. This includes the Care Council, Qualifications Wales and Estyn. It will be important that policies are aligned so that there is a consistency of approach and the organisation’s responsibilities are clear.*

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*In previous consultation responses the Council has asked that the registration rules for this group of workers should include a requirement for educational qualifications and experience. In the case of vocational subjects, occupational competence that satisfies the requirements of any subject specific regulator should also be part of the requirement.*

*This is repeatedly reinforced by our sector by individuals who use services, employers and learning providers at our on-going engagement events. While we recognise this consultation does not include a consultation on 'the rules' we hope that government and the EWC will be cognisant of this important factor going forward.*

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### CR13

Name: Tim Pratt

Organisation: ASCL Cymru (Association of School & College Leaders)

**Question 1** – Do you agree with the proposal that a requirement to register will fall on Work Based Learning practitioners who work in a training and learning capacity through a Welsh Government contracted Work Based Learning provider, as set out in paragraph 6.2?

*Agree*

#### **Supporting comments**

*We consider this an entirely appropriate course of action to ensure that the quality of WBL provision is of a consistently high standard. It also will ensure that those employed to do this work are afforded formal recognition of their roles.*

**Question 2** – Paragraph 6.10 identifies job roles/ titles that will not be required to register with the Council.

Are there any other job title/roles you feel should be exempt from registering with the Education Workforce Council under the category of 'Work Based Learning practitioner'?

*No*

**Question 3** - Paragraph 6.8 lists the specific Work Based Learning practitioner roles that we consider should be required to register. Are there any other roles that are not captured who you feel also fit within the description of a Work Based Learning practitioner?

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No

**Question 4** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

N/A

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### CR14

Name: *Rob Williams (Director of Policy)*

Organisation: *NAHT Cymru*

**Question 1** – Do you agree with the proposal that a requirement to register will fall on Work Based Learning practitioners who work in a training and learning capacity through a Welsh Government contracted Work Based Learning provider, as set out in paragraph 6.2?

*Agree*

### Supporting comments

*It should ensure a more consistent expectation across Welsh Government contracted Work Based Learning and ensure recognition for practitioners.*

**Question 2** – Paragraph 6.10 identifies job roles/ titles that will not be required to register with the Council.

Are there any other job title/roles you feel should be exempt from registering with the Education Workforce Council under the category of ‘Work Based Learning practitioner’?

*Not aware of any additional roles*

**Question 3** - Paragraph 6.8 lists the specific Work Based Learning practitioner roles that we consider should be required to register. Are there any other roles that are not captured who you feel also fit within the description of a Work Based Learning practitioner?

*Not aware of any additional roles*

**Question 4** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

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*In order to ensure the quality of Welsh Government contracted Work Based Learning, what provision is available and through which providers for support and training for practitioners?*

*Given the levels of pay for practitioners, it is crucial that fees are proportionate. Ideally, we would suggest that the bodies employing practitioners pick up annual fees as it is in their interests to ensure the quality and professionalism of individuals.*

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### **CR15**

Name: Mary van den Heuvel

Organisation: ATL Cymru

**Question 1** – Do you agree with the proposal that a requirement to register will fall on Work Based Learning practitioners who work in a training and learning capacity through a Welsh Government contracted Work Based Learning provider, as set out in paragraph 6.2?

*Neither agree nor disagree*

#### **Supporting comments**

*Please see our comments asking for a consistency of approach.*

#### **Consistency of approach**

*We are concerned that there are different expectations on different registrants with EWC. While FE lecturers are registered based on whether they have a contract, teachers and it would seem youth workers will be expected to have specific qualifications. Meanwhile, WBL practitioners only have to register on a WG funded scheme. It is difficult to achieve parity for all registrants without expecting qualifications, for example, of support workers. We would not expect all registrants to pay for new qualifications for a role they have held for many years.*

**Question 2** – Paragraph 6.10 identifies job roles/ titles that will not be required to register with the Council.

Are there any other job title/roles you feel should be exempt from registering with the Education Workforce Council under the category of 'Work Based Learning practitioner'?

*Again, please see our comments above asking for a consistency of approach.*

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### **Consistency of approach**

*We are concerned that there are different expectations on different registrants with EWC. While FE lecturers are registered based on whether they have a contract, teachers and it would seem youth workers will be expected to have specific qualifications. Meanwhile, WBL practitioners only have to register on a WG funded scheme. It is difficult to achieve parity for all registrants without expecting qualifications, for example, of support workers. We would not expect all registrants to pay for new qualifications for a role they have held for many years.*

**Question 3** - Paragraph 6.8 lists the specific Work Based Learning practitioner roles that we consider should be required to register. Are there any other roles that are not captured who you feel also fit within the description of a Work Based Learning practitioner?

*Please see our comments above relating to a consistency of approach.*

### **Consistency of approach**

*We are concerned that there are different expectations on different registrants with EWC. While FE lecturers are registered based on whether they have a contract, teachers and it would seem youth workers will be expected to have specific qualifications. Meanwhile, WBL practitioners only have to register on a WG funded scheme. It is difficult to achieve parity for all registrants without expecting qualifications, for example, of support workers. We would not expect all registrants to pay for new qualifications for a role they have held for many years.*

**Question 4** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

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**CR16**

Name: Allison Jones

Organisation: North Wales Training Ltd

**Question 1** – Do you agree with the proposal that a requirement to register will fall on Work Based Learning practitioners who work in a training and learning capacity through a Welsh Government contracted Work Based Learning provider, as set out in paragraph 6.2?

Agree

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### **Supporting comments**

*Yes, it is important that practitioners who work in the work based learning sector are included in the professional registration, as it will recognise the professionalism and skills contributed to the learning and delivery process by this particular group, which is often overlooked.*

*It will also provide a clear structure for staff development with appropriate and recognisable benchmarks, within the sector.*

*It will also go a long way to consolidating and enhancing the reputation of the WBL sector and ensure that this sector is seen to have parity of esteem within the learning community.*

*It will also provide assurance that those undertaking their learning and development within the WBL sector (and those funding it), that its practitioners are well qualified, professional and provide a robust and regulated service.*

**Question 2** – Paragraph 6.10 identifies job roles/ titles that will not be required to register with the Council.

Are there any other job title/roles you feel should be exempt from registering with the Education Workforce Council under the category of ‘Work Based Learning practitioner’?

*I do not believe that Internal Quality Assurers should be exempt from the registration, as they undertake a pivotal role in providing advice, support and guidance to those involved in training, learning and assessment in the WBL sector. How can it be deemed appropriate that those carrying out the learning and delivery be registered, but those who are then responsible for the quality assurance of the learner outcomes from this delivery, do not have to be registered?*

*It is also highly unlikely that anyone undertaking an IQA role will not have first progressed through those roles identified in section 6.8, and are, in the main employed directly (or indirectly in the case of subcontractors or peripatetic IQAs) by WBL providers. The progression pathway is also similar for the EQA role; however as the EQA role is one undertaken under the umbrella/employment of the Awarding Organisations, perhaps the EWC should engage with these groups to gain their views, but possibly offer registration on a voluntary basis, if the Awarding Bodies would not deem this appropriate for the role. This also may be influenced by who would be paying the fees as many EQAs are now self employed.*

**Question 3** - Paragraph 6.8 lists the specific Work Based Learning practitioner roles that we consider should be required to register. Are there any other roles that are not captured who you feel also fit within the description of a Work Based Learning practitioner?

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Please see comments above.

*Along- side this there does not appear to be any opportunity for those who formally fulfil Advice and Guidance roles to be part of the registration process. For example there are strict requirements for the provision of WBL contracted learning to provide learners with Initial assessments and subsequently review learner results and provide clear guidance, and signposting onto a learning pathway. Although not necessarily involved in the teaching and learning they provide a vital role in the learner journey and are responsible for supporting the learner to chose the most appropriate and sustainable learning pathway. In previous consultations and during the redevelopment of the NOS for Teaching and Education there was a clearly identified need for those providing this service to be included in the skill set requirements within WBL. If this registration is not deemed the appropriate vehicle for this then again could it be considered on a voluntary basis.*

**Question 4** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*I believe that the registration process will be welcomed within the WBL sector as the workforce have in general always had to demonstrate that they have the pre requisite qualifications, skills and experience to undertake their roles as assessors and IQAs ( D32/33/34, A1/V1/TAQA). Many in the WBL sector have also undertaken teaching qualifications and hold appropriate occupational and sector qualifications to underpin their learning and delivery roles. Consideration should be given to the inclusion of some of the wider roles undertaken within WBL (see above) and also to those within organisations who are responsible for such activities as curriculum planning, course development and resource management, particularly at senior levels, as they will hold the key to the providing the focus, and commitment to the continuous professional growth of the workforce.*

*Although at this point there is no information on the actual costs of registration or information on how this would be implemented, it should be considered that any model chosen should ensure that any fees payable are is fair. That any subsidies currently offered to registered practitioners in other learning settings are taken into account, and that if there is to be a voluntary registration that the fees should be consistent across the whole.*

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### CR17

Name: Sarah John

Organisation: Acorn Learning Solutions Ltd

**Question 1** – Do you agree with the proposal that a requirement to register will fall on Work Based Learning practitioners who work in a training and

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learning capacity through a Welsh Government contracted Work Based Learning provider, as set out in paragraph 6.2?

*Agree*

### **Supporting comments**

**Question 2** – Paragraph 6.10 identifies job roles/ titles that will not be required to register with the Council.

Are there any other job title/roles you feel should be exempt from registering with the Education Workforce Council under the category of ‘Work Based Learning practitioner’?

*Quality Assurers’ do sometimes carry a small caseload of Apprentices (usually maximum of 5) in order to maintain their own CPD, to support ‘peaks and troughs’ in Apprentices starting and if Assessors leave and there is overlap and where there may be specialist routes at a High Level where Assessor resource is limited as numbers of learners may be small or to aide growth in an emerging sector as new Assessors are recruited and become qualified.*

*We therefore believe they should still be registered.*

**Question 3** - Paragraph 6.8 lists the specific Work Based Learning practitioner roles that we consider should be required to register. Are there any other roles that are not captured who you feel also fit within the description of a Work Based Learning practitioner?

*Quality Assurer roles as above.*

*Please note the ‘Assessor’ role is only part of the role played by practitioners, e.g., we call our staff ‘Training Advisors’ because they need to provide learning/training/coaching/mentoring and Assessment in their roles. The term ‘Assessor’ only applies to one element of the role.*

**Question 4** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*For CPD and ongoing professionalism of the sector we think there should be an option for any individuals employed in the WBL Sector by a provider delivering Welsh Government Apprenticeships should have the option to become a member if they believe that they may, at some point in their role, support Apprentices in the work place, e.g., specialist tutors who only deliver Digital Literacy Essential Skills or perhaps one Module of an ILM Level 5 Unit in Finance/Managers who are qualified and support their teams with ‘peaks*

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*and troughs'. There also needs to be consideration for independent consultants who may support Providers on an 'ad hoc' basis e.g., for Welsh Language – we would expect them to be registered if they are used to carry out any delivery with an Apprentice.*

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### CR18

Enw: *Rebecca Williams*

Sefydliad: *UCAC (Undeb Cenedlaethol Athrawon Cymru)*

**Cwestiwn 1** – A ydych yn cytuno â'r cynnig y bydd y gofyniad i gofrestru'n berthnasol i ymarferwyr Dysgu Seiliedig ar Waith sy'n darparu gwasanaethau hyfforddi a dysgu drwy ddarparu'r Dysgu Seiliedig ar Waith a gaiff ei gontractio gan Lywodraeth Cymru, fel y nodir ym mharagraff 6.2?

*Cytuno*

### Sylwadau ategol

*Mae UCAC o'r farn bod dysgu seiliedig ar waith yn rhan greiddiol a gwerthfawr o system addysg a hyfforddiant Cymru, a bod ymarferwyr dysgu seiliedig ar waith yn rhan ganolog o'r gweithlu addysg. Mae'n rhesymol ac yn rhesymegol felly eu bod yn cael eu trin yn gyfartal, a'u bod yn cael eu cofrestru gan Gyngor y Gweithlu Addysg fel eu cydweithwyr, ac yn derbyn cydnabyddiaeth broffesiynol yn yr un modd.*

**Cwestiwn 2** – Mae paragraff 6.10 yn nodi'r rolau/teitlau swyddi na fydd yn ofynnol iddynt gofrestru â'r Cyngor.

A oes unrhyw deitlau swyddi/rolau eraill a ddylai, yn eich barn chi, gael eu heithrio rhag gorfod cofrestru a Chyngor y Gweithlu Addysg dan y categori 'ymarferwr Dysgu Seiliedig ar Waith'?

*Cytuna UCAC â'r cynnig yn 6.10.*

*Nid ydym yn cynnig unrhyw deitlau swyddi/rolau eraill i'w hychwanegu ar hyn o bryd.*

*Fodd bynnag, rhaid bod yn ymwybodol o gymhlethdod y sefyllfa ar lawr gwlad, a'r amrywiaeth eang o ran teitlau, rolau a diffiniadau. Bydd angen gweithio'n ofalus iawn gyda'r sector wrth symud ymlaen gyda'r cynigion hyn*

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**Cwestiwn 3** – Mae paragraff 6.8 yn rhestru'r rolau penodol ymhlith ymarferwyr Dysgu Seiliedig ar Waith yr ydym o'r farn y dylai fod yn ofynnol iddynt gofrestru. A oes unrhyw rolau eraill na chânt eu nodi y mae'r disgrifiad o ymarferwr Dysgu Gydol Oes yn berthnasol iddynt yn eich barn chi?

*Cytuna UCAC â'r cynnig yn 6.8.*

*Nid ydym yn cynnig unrhyw deitlau swyddi/rolau eraill i'w hychwanegu ar hyn o bryd.*

*Fodd bynnag, fel uchod, rhaid bod yn ymwybodol o gymhlethdod y sefyllfa ar lawr gwlad, a'r amrywiaeth eang o ran teitlau, rolau a diffiniadau. Bydd angen gweithio'n ofalus iawn gyda'r sector wrth symud ymlaen gyda'r cynigion hyn*

**Cwestiwn 4** – Rydym wedi gofyn nifer o gwestiynau penodol. Os oes gennych unrhyw faterion cysylltiedig nad ydyn ni wedi mynd i'r afael â nhw, defnyddiwch y lle hwn i wneud hynny.

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