

Post 16 Professional Learning Scoping Study

Executive Summary

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A report submitted by ICF Consulting Limited in association with

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Contents

Executive summary	3
Background to this scoping study	3
Purpose of study	
Current context	
Key findings	
Conclusions	
Recommendations	

Executive summary

Background to this scoping study

This study was commissioned by the Welsh Government in order to better understand how professional learning could support the post-16 workforce to meet the challenges facing the sector. Its scope included further education, work-based learning and adult learning in Wales.

The study took place against a backdrop of:

- The development of a professional learning framework (PLF) for the school workforce, known as the National Approach to Professional Learning¹, encompassing teaching support staff as well as teachers and leaders at all levels.
- The implementation of the Hazelkorn review². will bring together all post compulsory education and training (PCET) for the purposes of direction and funding under a new body, the Commission for Tertiary Education and Research (CTER)³. Apart from the work done by individual learning providers, no part of the post-16 sector workforce has a PLF nor is there any overall strategy for the sector's workforce development.
- Sector challenges arising from the Welsh Government's expectation that learning in the post-16 sector must contribute to its economic and social ambitions for Wales set out in the Well-being of Future Generations (Wales) Act 2015 and Taking Wales Forward to promote and enhance vocational routes into and through further (FE) and higher education (HE).⁴
- Workforce challenges, such as using digital technology for effective teaching; integrating literacy, numeracy and digital skills in the curriculum; dealing with the practical challenges of teaching disparate groups in terms of ability and learning styles; and handling disruptive and difficult behaviours by some learners. Implementation of the Welsh Language Strategy has also drawn out the need to provide more Welsh-medium teaching/support to raise the Welsh language competences of all post-16 learners. These could give rise to skills gaps and skills shortages.
- Issues raised in reviews by Qualifications Wales (QW), Estyn and others about the consistency of teaching and learning across the sector.

¹ This can be obtained from: https://hwb.gov.wales/professional-development/national-approach-to-professional-learning

² See Education in Wales our national mission (2017) and A framework for building a PCET system for Wales (2016)

³ See the Welsh Government's response in Public good and a prosperous Wales: building a reformed PCET system (2017) and the subsequent Ministerial response to the consultation (2018) http://record.assembly.wales/Plenary/4663#A40240

⁴ Taking Wales Forward: a programme for government (2017)

⁵ Welsh Government (2017) Welsh in education action plan 2017-21. Available at: https://gov.wales/sites/default/files/publications/2018-02/welsh-in-education-action-plan-2017%E2%80%9321.pdf

Purpose of study

Study aims

The study draws together an evidence base of primary and secondary research to inform future Welsh Government policy on post-16 professional learning which aligns with its evolving policy affecting the sector.⁶ The evidence gathered is used to:

- Evaluate if, and how, the schools' PLF could be developed and implemented as a framework for the post-16 sector which would meet the needs of the whole sector:
- Review the appropriateness of existing post-16 practitioner qualifications and other professional learning for the different groups of staff both currently and into the future;
- Consider and add to the strategic priorities for post-16 professional learning already identified by the Welsh Government (see Annex 1);
- Identify practical recommendations and how they should be taken forward by the different stakeholders, including the proposed new body, the CTER;
- Identify where there is a need for further research.

Scope of research

The research included a mix of desk research and qualitative interviewing with the latter filling gaps in current knowledge about the workforce challenges and how professional learning is addressed within the sector. It principally consisted of:

- A review of 20 reports published by Estyn, QW, the Welsh Government, the National Federation of Training organisations in Wales (NTfW) and other bodies which have considered aspects of the sector's professional development;
- Thirty interviews of stakeholders, including bodies representing sector workers (several trade unions) and employer/sector bodies, providers of qualification courses including initial teacher education (ITE), Estyn, QW, Education Workforce Council (EWC), and Coleg Cymraeg Cenedlaethol (CCC), and over 25 interviews of staff in providers⁷ about skills gaps and shortages, training provision, qualification requirements and use of the professional standards;
- Review of the research literature including reports and studies published by OECD, the European Commission and Cedefop on the relation between workforce qualities and learner achievement in vocational education and on the use/value of professional frameworks in other countries. This was not a systematic search but was supplemented by a more detailed examination of professional learning in the post-16 sector workforce in Australia, England, Ireland, Ontario (Canada) and Scotland using secondary sources and personal knowledge;
- An analysis of the updated registration data collected by EWC to explore the qualifications and skills of the current workforce;
- A wide range of sector conversations across Wales in nine providers (four FE colleges, three Work-Based Learning (WBL) providers and two adult learning (AL) providers) which included over 350 staff in all roles (leadership team, middle managers, teachers and assessors, teaching support) as well as in four sector specific forums. These took place

⁶ The study covers the teaching and teaching support workforce in PCET excluding those in schools teaching in sixth forms and those in universities. This is broadly the workforce in FE colleges, WBL providers and ALproviders who teach a wide variety of levels/subjects both vocational and academic.

⁷ In total this included all the general FE colleges, nine WBL and six AL providers.

largely during May 2019. The sessions were a mix of interviews, discussion groups and focus groups.

Current context

Characteristics of the post-16 workforce⁸

EWC data shows that the majority of teaching and assessing staff are qualified. Most FE teachers who declared their qualifications for registration have a qualification at a level 6 or above (84%). Most have a teaching qualification (86% of those with declared qualifications). Among WBL practitioners who have declared their qualifications on the EWC's register, 55% have a level 6 or above as their highest qualification with 47% holding a teaching qualification and 40% holding an assessor qualification. Even so, this means that nearly 20% of WBL practitioners who provided this information have a level 2/3 qualification as their highest qualification and just over half of WBL practitioners and one in seven of FE teachers who have provided this information do not have a teaching qualification.

All groups of the workforce have relatively few members who have reported that they can work/teach through the medium of Welsh. Only 14% of FE teachers, 11% of WBL practitioners, and 12% of FE support staff reported they had skills to work/teach in Welsh.

Organisational and regulatory landscape

The scoping study gathered information on what policies affect how the sector meets its workforce needs - in terms of recruiting new entrants and maintaining and improving the quality of the workforce. The key features are:

- Providers fund most of the continuing professional development (CPD) and qualification training themselves: both direct costs (fees, training staff, cover staff) and indirect costs (paid time-off). This is supplemented by some Welsh Government support, principally the Skills Priorities Programme (SPP) and the Work Welsh (Cymraeg Gwaith) programmes for FE colleges;
- FE teachers must have a teaching qualification within two years of appointment under the FE Teachers Qualifications (Wales) Regulations 2002. For other groups of practitioners, providers determine what qualifications are required by recruits and whether these are qualifications which can be obtained after appointment;
- All post-16 providers are inspected by Estyn; the teaching and assessment qualifications which are taken by the workforce are regulated by QW if they are sub-degree qualifications offered by recognised awarding organisations or reviewed by the Quality Assurance Agency for Higher Education (QAA)/Higher Education Academy (HEA) if they are degree or post-graduate level FE teaching qualifications;
- A minimum requirement for FE teachers to have paid time for 30 hours' CPD a year. This
 applies to no other groups of staff, though in practice many providers extend this to some
 or all staff;
- Individual staff working in the sector are required to register with EWC as a condition of employment and pay an annual fee to remain registered. EWC offers an online professional learning passport (PLP) to record their CPD. Once registered, staff have to

⁸ The EWC's registration data for the sector workforce is far from complete although it is statistically unlikely that the qualifications of those who have not provided full information do not match those who have. Consequently, the data is sufficient to be used in modelling of need/demand for qualifications which has hitherto not been possible.

⁹ They are not inspected by Estyn, which is the case for degree or post graduate level school teaching qualifications. From September 2019, ITE courses for school teachers will be assessed, evaluated, and monitored against the Welsh Government's *Criteria for the accreditation of initial teacher education programmes in Wales, by* EWC's ITE accreditation board.

observe a code of conduct which sets out seven key principles of good conduct and practice for registrants.¹⁰ One of the key principles is closely linked to professional learning; registrants must 'take responsibility for maintaining the quality of their professional practice';

 Professional standards for teachers and assessors have been co-produced and are available for use by the sector to inform ITE, qualifications, and CPD.¹¹

It is also evident that:

- Relatively few of the registered workforce (6%) are active users of the PLP;
- EWC's code of conduct for registrants requires them to take responsibility for maintaining the quality of their professional practice in similar ways to the professional standards; and
- Arrangements for accrediting, quality assuring and monitoring post-16 teaching qualifications differ from those established for school teaching qualifications.

A key development in the PCET sector will be the establishment of the CTER by 2022 with opportunities to plan and fund the PCET sector in an integrated way. This may include incentivising and facilitating collaboration between HEIs and FE, WBL and AL as well as planning and funding post-16 professional learning in a more strategic way, working closely with EWC and QW.

Key findings

Skills gaps and shortages

Although the scale of skills gaps and shortages is not currently known, which represents a barrier to effective strategic workforce planning, the literature, stakeholder interviews and sector conversations indicate that there are skills' gaps which most post-16 providers are addressing in their training and development:

- Commonly and persistently in all parts of the existing workforce: pedagogical skills for teaching/tutoring literacy and numeracy, and digital skills to use digital resources and software in teaching with confidence;
- Commonly in FE and WBL: up to date subject knowledge among some vocational teachers/assessors, particularly in science, technology, engineering and mathematics (STEM) subjects where business/industry change is rapid;
- Commonly and persistently in FE and WBL: confidence to use the widest range of teaching approaches.

There are also specific concerns about practitioners' Welsh language skills and non-Welsh speakers' awareness of the needs of Welsh speakers, Welsh-medium opportunities and resources.

There are the following skills' shortages:

- Commonly and persistently in all types of provider: shortages of STEM subject teachers/assessors, most particularly in engineering;
- Commonly in WBL providers: shortages of qualified assessors in many subject areas;

¹⁰ EWC, Code of Professional Conduct and Practice for Registrants with the EWC. Available at: https://www.ewc.wales/site/index.php/en/fitness-to-practise/code-of-professional-conduct-and-practice-pdf/file.html

¹¹ Welsh Government, Professional standards for teachers and work-based learning practitioners in Wales (2017) https://hwb.gov.wales/repository/resource/101a7600-c001-4aaa-9e22-6fd4be70052f/en

■ Commonly in all types of provider: shortages of Welsh-medium teachers/assessors with the language competence needed to teach/work in Welsh.

The PGCE PCET incentives scheme provides higher grants for STEM subject teachers studying full-time but not for applicants for Welsh-medium teaching. Some providers are addressing these shortages in their recruitment strategies (pay scale on appointment, adapting roles, offering training) and/or addressing these in their training and development (upskilling existing staff).

Practitioner qualifications

There are a wide range of qualifications (at least 39) with considerable numbers of different providers (HEIs and awarding bodies). Though there is little published information on takeup, the relatively small size of the workforce suggests that some must have relatively few learners while updating and revision may not be economic and difficult to engage providers. This range reflects the diversity of roles and range of entry points. They are not currently aligned with the post-16 professional standards and many have not been adapted to fully reflect recent policy developments and trends within the sector, such as curriculum reform, evidence-based practice, digital learning, literacy and numeracy, and learners' mental health. Providers report having to tailor the delivery of practitioner qualifications or developing bespoke CPD to plug the gaps that are not covered by the current qualifications available.

There is general support within the WBL sector for new education and training qualifications and the rationalisation of current qualifications. The FE sector has more mixed views. There was support within the WBL sector for minimum practitioner qualification requirements. There were, however, some providers concerns expressed about whether this would adversely affect recruitment and retention although some felt it would attract and retain staff qualified to teach. Most AL providers were broadly satisfied with the teaching qualifications available to those wanting to work in the sector, but they faced challenges in being able to fund staff to obtain them.

Continuing professional development

Practitioners and stakeholders broadly accept that professional learning is of value to achieving improvement. Many strongly support it in their institutions and point to the improvements made and the impact this is having on individual staff development and group performance.

Stakeholder interviews and sector conversations indicate that most CPD is being developed and delivered at provider-level rather than being planned, commissioned or delivered collaboratively at a national or regional level. This raises potential challenges regarding capacity, cost effectiveness, quality and consistency of delivery. Providers generally have CPD plans in place covering all staff and most refer to an evidence-based approach to identify and support staff skills and knowledge needs which is largely corroborated by staff. CPD development is often linked to organisational and institutional plans, particularly within the FE sector, and changing learner needs. While some have forward-looking approaches to developing CPD, CPD policies in providers generally appear to be reactive, which may mean they neglect persistent problems (skills' gaps and skills' shortages) and longer-term issues (replacing older staff, progressing teachers to managers).

Evidence from the literature suggests that not all practitioners are satisfied with the CPD offer or performance management arrangements while a large proportion of practitioners surveyed do not believe they are receiving the required 30 hours of CPD. The sector conversations indicate that most believe that they achieve at least 30 hours.

Time, workload and costs were identified by FE, WBL and AL interviewees as key barriers to meeting individual needs. There is also a perceived inconsistency in the availability and quality of CPD, with significant variations between - and within - the types reported. FE staff

generally held more favourable views on CPD availability than WBL and AL, where there was often but not always considered to be more sporadic provision and a lack of national structures, capacity and expertise to deliver CPD in house. There were concerns in FE about a lack of continuity and limited funding for CPD from the Welsh Government because it is available on a short-term basis (e.g. annual grants).

There are generally favourable views across the sector on the professional standards for FE and WBL practitioners. They are seen as a positive development in supporting professionalisation of the sector, especially in WBL and AL, and are broadly consistent with providers' views of competencies needed in relation to developing CPD plans. However, there is limited evidence that CPD is being developed to align with the professional standards.

Post-16 workforce professional frameworks

It is evident from the literature and system level case studies about the development and operation of both formalised and unregulated frameworks that:

- They reflect country-specific needs but have many common features designed to enhance practitioners' performance on the job and their status;
- Frameworks can draw together common understanding of standards and competences for a workforce group that broadly equates to Wales's post-16 practitioners, where the quality of work or practitioners' capabilities should be developed to maintain and improve quality within all providers;
- Professional standards have been developed further to be used as competences to drive qualifications and CPD in other countries. In these cases, they have been supported by tools and materials to enable practitioners and their line managers to develop individuals' CPD, courses of formal training, qualifications and progression;
- PLFs are often used to enhance practitioners' learning and development and there is some evidence that they do this. There is some evidence from the differences between Scotland and England that regulation might increase motivation to participate in CPD;
- Many systems have collaborative government or sector-led arrangements for providing CPD across the sector developed by the sector through training bodies purposefully established for the post-16 workforce.

Wales has many of the components of a PLF in place already to support training and qualification – professional standards covering most staff, a set of qualifications covering the range of entry points, registration reinforcing CPD and CPD requirements for some staff, for example. What it does not have is consistency across all the post-16 sector workforce in these matters and a clear relationship between its standards and its practitioner qualifications, progression and CPD.

The schools' professional framework in Wales

While the schools' workforce PLF in Wales caters for a different and less diverse workforce, it provides many ingredients that would be needed in a PLF for the post-16 workforce, in particular the development of the professional standards so that they cover teaching, leadership and learning support and supporting material which could be adapted for use for the post-16 sector workforce.

The schools' standards are extended well beyond exemplar material available for the post-16 standards. This describes competencies/expectations for different experience levels and for their assessment so that they can be used by practitioners and trainers/educators. Similar practical materials would be of benefit to improve the dissemination and usability of the post-16 standards. They also provide on-line resources to support common and effective

approaches to CPD which help schools to adopt them and not reinvent the wheel by creating their own. This is also clearly the case in other countries' PLFs.

Conclusions

How well is the current system working?

The current system is working well in many respects. These appear to be its strengths:

- Broad acceptance that professional learning is of value to achieving improvement and that it is necessary to enhance teaching and development in the workforce;
- Relevant and modern standards in place for most of the sector's practitioners which could be capable of supporting competence based professional learning;
- Local collaboration between FE colleges and HE, business and schools and within sector collaboration in AL partnerships for the provision of CPD to AL;
- Wide understanding of the skills' shortfalls among some practitioners in most providers with some responding in innovative ways to tackle these;
- Some providers have invested in high quality resources and expertise to support professional learning;
- Support structures and some funding is in place which can provide CPD to increase
 Welsh medium delivery and improve the delivery of higher-level qualifications by practitioners;
- A range of entry level qualifications that reflect the range of roles.

Given the development of other education and training workforces in Wales and of other post-16 sector workforces, these appear to be concerns:

- No clear and consistent response to professional learning needs (both for qualifications and CPD) from the sector as a whole;
- No structures (neither qualifications or CPD) which support progression and professional development within the profession after entry;
- Professional standards which are either adjusted for use or little used by the sector to guide CPD while lacking the provision of tools and materials available to practitioners in schools;
- Clearly identified skills' gaps with little systemic CPD response (almost all providers act on their own to define and commission most training);
- Probable gaps in ongoing industry-based knowledge updating for many practitioners and the underpinning pedagogy for vocational education;
- Levels of expectations around CPD, expertise and capacity to respond differ greatly between the component parts of the post-16 sector and within;
- A plethora of qualifications; many significantly outdated (particularly WBL); some requiring greater flexibility (for upskilling);
- Entry qualification standards which apply only to part of the sector and may be out of date/difficult to follow;
- Only lately available data to begin to use for workforce planning; inadequate information about workforce qualifications and training; very limited information on skills needs to guide sector responses on CPD;
- Little knowledge in the system of the CPD that works as there is little or no evaluation of it; held possibly by a few in a few places;

- A shortage of teachers and assessors with the ability to work through the medium of Welsh, particularly in WBL;
- Insufficient content within teaching qualifications to raise practitioners' awareness of the Welsh-language and their understanding of the needs of Welsh-speaking learners;
- A lack of a national CPD programme for developing the Welsh language skills of WBL practitioners (similar to the Work Welsh scheme for FE and HE, and the Sabbaticals Scheme for schools).

What system changes could make it work better?

- Rationalised suite of workforce qualifications: provide a family of linked qualifications for different roles/levels between teaching support and institutional management which give flexible upskilling pathways from different entry levels. This would update all qualifications, provide a better basis for their future updating, make it easier for new entrants, existing staff and recruiters to navigate the system, and provide opportunities for progression. Consideration could be given to the transferability of these qualifications to schools. At the same time, arrangements for the approval and inspection of FE teaching qualifications could be brought into line with those for school teaching degrees and post-graduate qualifications.
- Comprehensive teaching qualification requirements: ensure all learners have appropriately qualified staff who recognise the need for CPD by either updating the 2002 regulations so that they relate to current/future qualifications and require similar teaching qualifications to be held by teachers in WBL and AL from a date to be specified or bringing them into line but use other non-regulatory means to ensure compliance.
- Professional standards that can be translated into supporting teaching excellence in the post-16 sector: check that the current standards are up to date and ensure that they cover teaching support staff in the sector as well; then develop them with descriptors of competences and experience levels (using the Education and Training Foundation as a model) to inform qualifications and CPD and disseminate to users. It would help if they were better distinguished by name and content from the code of conduct.
- Collaborative approaches to the development and delivery of commonly needed CPD training: ensure providers develop, commission and deliver training which meets skills' needs/gaps across the workforce collaboratively, changing the way that the sector currently works. This could be helped through the way any Welsh Government required training programmes are developed and funded including the SPP, a sector survey of key skills' needs, and building links with PGCE delivery centres to ensure the whole sector is well-trained.
- A standard requirement for CPD across the entire workforce: extend the requirement for 30 hours CPD to all of the workforce and encourage providers to do this in the short-term. It will help if there is a common definition of what CPD counts towards this, it includes maintaining up to date vocational knowledge, and CPD is recorded using the PLP and a common set of categories.
- A full declaration of workforce qualifications and skills to EWC: expect providers to support EWC to obtain full information from 99% of the registered workforce. Consideration should be given to requiring the AL workforce to register. This will better enable workforce planning, especially the need for ITE and Welsh language skills.
- Better understanding of the CPD that works in the sector: draw together what is known about process and impact from experience in Wales and the wider literature and add to it through further action research. This can provide some guidance to providers' design and delivery of CPD in the short-term.

- Welsh language CPD programme encompassing WBL: extend the Work Welsh scheme to WBL. Trained staff are unlikely to be lost to the sector. This will ensure Welsh speaking students in WBL are not disadvantaged.
- Tools and resources for the whole workforce and all providers: begin to establish tools and resources relevant to the sector starting with adapting those available to the schools' workforce, such as on effective collaboration and networking, reflective practice and action research. This could also include developing online/blended learning as hwb is developed for the sector.

Once some of these changes were implemented, other less urgent actions could be considered. These should include: accrediting progression training and CPD, the National Academy for Leadership in Education offering PCET leadership course guidance as it has begun to do for the schools sector, and improving the data available for workforce planning and monitoring.

How could a PLF for the post-16 workforce help to achieve a better system?

A PLF should not stop good practice in providers nor be a burden to institutions or individual practitioners. It is more a concept that can wrap around the components of professional development (capability, behaviours, opportunities and impact) with varying degrees of regulation by government, which together can provide a framework for improvement.

In Wales, PCET Is not undergoing such a high degree of reform compared to schools but it is faced with multiple challenges that the workforce has to absorb and deliver and a workforce that has to replace itself largely through the recruitment of experienced vocational experts without teaching experience. This requires an adaptable workforce and one that needs continuous high levels of professional development. Practitioners and institutional managers said this too. It also requires a workforce with a higher profile and recognition. This is not the case at present.

In such circumstances, a PLF could support these needs and provide a framework for many of the changes set out above to make the system better. A PLF for PCET practitioners in Wales could:

- Bring together all of those things which are known to enhance practitioner development through their careers and ensure they are timely, relevant and valued;
- Bring together practitioner and institutional understanding of what enhances workforce development and its high priority;
- Be built around the CPD entitlement and the professional standards and their development which are the bedrock of practitioner development;
- Build the sector's identity as a profession to support recruitment and retention and for professional development to support progression and continuous improvement;
- Enable a sector response to qualification development and common CPD needs;
- Begin to create a PCET workforce that identifies with Wales and is working as one;
- Provide better value for money through reduced duplication of effort in relation to qualification development and the provision of CPD.

Recommendations

Recommendations to Welsh Government

Drawing on the above, we would propose that the Welsh Government should:

- 1. Enable a sector-led PLF to be developed on the established principles of co-production;
- 2. Provide the direction of travel for the PLF and a vision of the concept;
- Establish expectations that the PLF will build on and use the professional standards, and that it will encompass standards for professional learning provision which cover all the workforce supporting teaching and for individual participants in the workforce to practise and progress;
- 4. Take steps with QW and the HEI providers to rationalise the qualifications used and revise key qualifications to bring them up to date and ensure flexible delivery; modify the PCET PGCE to become a minimum entry qualification for teaching roles throughout the sector:
- 5. Consider revising and clarifying the regulation of qualifications for entry to the sector alongside the revision and rationalisation of the qualifications **or** provide guidance to providers as part of the PLF;
- 6. Take steps to adjust arrangements for the approval of teaching qualifications and the quality assurance of the courses to bring them into line with those for schools;
- 7. Review the effectiveness and value for money of the PGCE PCET funding which currently provides grants for students enrolled on full-time courses provided at four universities:
- 8. Develop new collaborative approaches to the development of CPD provision across the sector; identify a champion to establish a 'train together, train for Wales policy' within the sector for CPD;
- 9. Seek representatives of the sector to review the professional standards so that they can be used for the development of qualifications, CPD training and individual training and development plans (for all staff who teach and support teaching, including leaders and managers), and develop resources along the lines of those provided by the ETF so that they can be better used;
- 10. Consider changing the name of the professional standards so they are better distinguished from the standards for registrants along the lines of those in Scotland which are standards for career-long professional learning;
- 11. Commission a sector survey of key skills' needs;
- 12. Seek a commitment from ColegauCymru and NTfW that their members will provide all staff with at least 30 hours of CPD a year (pro rata for part-time) and support the PLP once CPD has been commonly defined;
- 13. Support the development of a common definition of CPD and a set of categories for recording;
- 14. Urge providers to support EWC's efforts to have full information on all registrants and set a target for this to be achieved in EWC's grant letter;
- 15. Understand better what CPD works in Wales and ensure this informs the design and delivery of training across the post-16 sector:

16. Consider the most appropriate structures for leading and directing the PLF as the arrangements for establishing the CETR take a clearer shape.

Recommendations for other bodies

Education Workforce Council:

- 17. Continue efforts to have full information on all registrants;
- 18. Continue to encourage and monitor usage of the PLP.

Qualifications Wales and HEI providers of PCET degrees:

19. Work together with the sector, where appropriate, to reformulate qualifications to better meet the sector's needs and provide upskilling pathways.

Post-16 providers:

- 20. Support the Welsh Government's intentions to improve the standards of the post-16 workforce;
- 21. Work together to reform qualifications, build on the professional standards and provide better quality CPD;
- 22. Commit to provide all staff with at least 30 hours of CPD a year;
- 23. Support the development of a common definition of CPD and a set of categories for recording;
- 24. Support EWC's efforts to have full information on all registrants.