

community



Official Response

to the Government consultation

Appropriate body reform and induction assessment

July 2022

About this consultation

September 2021 saw the launch of induction programmes for new teachers based on the Early Career Framework¹ (ECF). The ECF, published in 2019, sets out what all early career teachers (ECTs) should learn about, and learn how to do. This was part of significant reforms to induction, which included extending the period of induction support to two years and an offer of DfE-funded training delivered to all ECTs working in state-funded schools. Funding paid directly to schools² also ensures that each ECT working with a DfE-funded training provider has a dedicated and trained mentor to support them through their induction.

As part of those reforms, we committed to reviewing the appropriate body (AB) role over a longer timescale to ensure it reflects the changes to statutory induction, remains fit for purpose and is accountable, and supports greater quality and consistency in the AB services schools receive. Most recently, the 'Opportunity for all' white paper³, published in March 2022, committed to reforming the role of the AB in response to feedback about the implementation of the ECF-based programmes. This commitment was made in the context of a broader shift in the role of local authorities (LAs) which we have reflected in our plans to reform the AB sector as set out in this consultation.

The white paper also set out the vision for a fully trust-led system. The language of current induction regulations refers directly to headteachers and schools rather than trusts as induction regulations are not statutory requirements for academies. However, the majority of academies actively choose to offer induction in line with statutory requirements in the interests of their workforce. The scope of this consultation therefore recognises that ensuring AB services cater to the needs of trusts, and induction organised at trust level, is a core requirement for how the future AB role is developed.

The focus of this consultation is specifically on the regulatory systems, and role of ABs in supporting those systems. The consultation also invites feedback on which aspects of the current induction system are valued and where there are areas for improvement. The content and delivery of the DfE-funded provider-led ECF-based induction programmes are not within scope of this consultation.

The consultation is split into three parts.

Parts 1 and 2 explore elements of the AB role that we wish to review to ensure guidance and regulatory requirements are meeting the needs of schools and ECTs. We are consulting on:

- The role of the appropriate body – identifying what works and what needs to be revised to ensure greater consistency and quality of delivery.

¹ Early career framework - GOV.UK (www.gov.uk)

² Funding and eligibility for ECF-based training - GOV.UK (www.gov.uk)

³ Opportunity for all - Strong schools with great teachers for your child (publishing.service.gov.uk)

- The value of formal assessment – in the short term, exploring whether any updates to guidance can reduce burdens and, longer term, ensuring the statutory requirements are valued and fit for purpose.

The third part sets out a significant change to which organisations can operate as an AB. The ability to operate in the role of AB will be removed from LAs leading to an AB sector of predominantly teaching school hubs (TSHs). We are consulting on:

- The timeframe for this change, and how best to support the sector through transition and capacity building

Alongside these areas of consultation, this document also provides information for context on some other developments that we are in the process of delivering:

- Administrative improvements we are making for using our digital service
- A specialist AB for British Schools Overseas (BSOs)

About Community | Education & Early Years

In Autumn 2020, Voice – the Union for Education Professionals became a section of Community Union. Community | Education & Early Years represent teachers, lecturers, tutors, school support staff, early years and childcare professionals in workplaces throughout the UK.

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This Official Response was submitted by email to AB.consultation@education.gov.uk
This document will be published on our website www.community-tu.org following the closing date of the consultation.

Summary

This year, for the first time, the vast majority of new teachers are undertaking a new high-quality and structured professional development and support programme based on the ECF, which will provide them with the firm foundation they need for a long career in the profession.

We are creating a world-class teacher development system, building from Initial Teacher Training, through to early career support, specialisation and onto school leadership. At each phase, teachers will have access to high-quality training and professional development underpinned by the best available evidence, assured by the Education Endowment Foundation. This is creating a golden thread of professional development that teachers can draw on at every stage of their careers.

Establishing new ECF-based induction programmes, as part of a two-year statutory entitlement for ECTs to access structured training and mentoring, has been a huge undertaking for those implementing it.

We know that part of ensuring ECTs can effectively engage in their ECF-based induction programmes is ensuring that all ECTs receive their statutory entitlements, such as dedicated time off timetable and regular mentoring. It is the role of the AB to check that ECTs receive these entitlements. As part of this consultation, we want to hear about any barriers and challenges ABs face when making these checks, and more generally about where ABs add most value to the induction process.

Part 1: The focus of the first part of this consultation is on how ABs can perform their role effectively. While the content and the delivery of the DfE-funded provider-led ECF-based induction programmes is not within scope, we are keen to understand how we can ensure the systems around statutory induction – checking entitlements and supporting ECT progress – can be delivered as efficiently and effectively as possible.

We will use this feedback to update existing guidance to simplify systems or provide greater clarity. Where required we can make updates to regulations to ensure the AB role is fully aligned to the system that provides ECTs with ECF-based training as part of statutory induction.

Part 2: During induction, we want ECTs and school and trust leaders to be able to focus on what matters the most in this crucial stage of a teacher's career. We would like to hear what the sector values about the final assessment process and how it adds value for ECTs, schools and the teaching profession. We also want to hear about where the formal assessment process creates unnecessary burdens so that we can ensure that time set aside for induction activities and assessment is being used in the most effective way. Short term, we will use this feedback to update guidance. Longer term, we will consider reviewing the requirements around the frequency and basis for assessment if

the consultation finds that there are any aspects which are no longer fit for purpose or adding sufficient value.

Part 3: We have considered the AB sector and know that we can make significant improvements and efficiencies for schools and trusts by making the current AB sector smaller. We will do this by restricting the AB role to TSHs in the future and removing the role from LAs. By reforming which organisations can act as ABs, we will create a system where every AB is held to account directly by the Department for Education for what they deliver which will increase the quality and consistency of AB services offered to schools. We will do this through existing quality assurance mechanisms and contractual relationships so we do not create any additional burdens.

This change in role for LAs will be consistent with the wider shift in the role of LAs reflected in the 'Opportunity for all' white paper which describes a future system with LAs stepping back from their role in directly maintaining schools.

In addition to TSHs as ABs, the Independent Schools and Teacher Induction Panel (ISIP)⁴ can continue to act as AB for its members. We also plan to determine a specialist AB to work with BSOs which we explain later in this document as part of our other developments. We are proposing that this change to the AB sector takes effect from 1 September 2023 but would like to consult on the proposed timeline and any delivery implications linked to this.

In the final section, as further context to the consultation proposals, and in response to feedback to date, we have set out progress and longer-term commitments on how we are working to improve the data and administration systems for ABs and schools. We have also set out the intention to appoint a specialist AB to serve the specific requirements of BSOs that offer induction.

⁴ For information on membership, contact ISIP directly: [Independent Schools Teacher Induction Panel \(istip.co.uk\)](https://www.istip.co.uk)

Part 1: The appropriate body role

Background context

ABs are the organisations who quality assure statutory teacher induction and every headteacher who employs ECTs who are to serve an induction period must appoint an AB before induction can begin.

The headteacher, along with the AB, is jointly responsible for the monitoring, support and assessment of the ECT during induction. Through quality assurance, an AB should ensure that headteachers are aware of and can meet their responsibilities, and that the monitoring support, assessment and guidance procedures in place are fair and appropriate.

The full list of AB roles and responsibilities are outlined in the statutory induction guidance⁵. These include taking steps to ensure that: schools are providing ECTs with a reduced timetable in addition to planning, preparation and assessment (PPA) time, mentors and induction tutors have the ability and sufficient time to undertake their role effectively, an ECF-based induction programme has been put in place and that the ECTs' teaching post is suitable for induction. ABs also ensure that a fair decision is made with regards to successful completion of an ECT's induction period.

In addition to their core roles and responsibilities, ABs often give support and assistance on induction to schools and trusts and provide information when requested. They also have an important role in record keeping, ensuring that ECT records and assessment reports are maintained, and that the relevant information is provided to the Teaching Regulation Agency (TRA).

Although we published guidance for ABs in 2021 which included examples of best practice, the department does not currently specify how ABs should conduct their role. As a result, we know that ABs operate in different ways and there is significant variation in quality assurance processes and practices that schools must engage in with their AB as part of statutory induction. We want to increase consistency in the way ABs operate so that every school and trust has access to an AB that has the skills, expertise and resources to support them to offer a high-quality induction to ECTs.

As part of increasing consistency, and to help schools adapt to the new requirements, it is essential that all ABs prioritise their core role of checking the statutory entitlements that underpin every induction programme. These checks should include particular focus on ensuring that all schools are providing all ECTs with a reduced timetable, regular mentoring and an ECF-based induction programme to allow them to engage effectively in their induction programmes. We know that the coming academic year will be the first time that schools across the whole country have had two cohorts of new teachers serving statutory induction at the same time. To support this, it is especially important that we make sure all ECTs receive their statutory entitlements and that mentors are given sufficient time to conduct their role effectively to support their ECTs. Therefore,

⁵ See paragraph 5.11 of the [Statutory Induction Guidance 2021 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) for a full list of AB roles and responsibilities.

we are asking ABs to ensure that they provide rigorous checks on all schools to ensure that ECTs and their mentors are receiving their full entitlements and support.

Matters for consultation

We want to hear about any barriers that ABs face in making sure all ECTs receive their full statutory entitlements and how these barriers might be overcome. Your feedback will help to inform policy thinking on how we can support schools, trusts, and ABs in making sure that all ECTs are accessing their entitlements and that their mentors are supported to carry out their role.

Thinking about the AB role more generally, we also want to better understand what the sector values about the role of the AB, which aspects of their role they carry out most effectively, and where it might be possible to reduce or simplify any current burdens experienced by schools and ECTs as a result of their AB's quality assurance processes.

We want to ensure that all ABs offer the same high-quality services; your feedback will help us to develop policy to achieve this and clarify how ABs should operate. We also need to better understand to what extent ABs currently differ in their ways of working and their effectiveness to help us to prioritise which areas of the current AB role we should focus on.

Questions

Q1. What barriers do ABs face in ensuring that ECTs are provided with their statutory entitlements and how could these be overcome?

Your answer here could include consideration of the resources, expertise, and statutory remit of ABs.

Every headteacher who employs Early Career Teachers who are to serve an induction period, must appoint an Appropriate Body before induction can begin. But the availability and dispersion of ABs has been reduced in recent years as funding for Local Authority central services has been decimated. This has meant some schools in some areas have identified difficulties in securing a local AB with the capacity to support their ECTs.

Whilst Community is broadly supportive of the aims of the Early Career Framework its implementation has been hugely flawed, with lead providers, teaching school hubs, and the host school all placing incredible demands on tutors, mentors and teachers without regard for each other. This multi-obligatory system has led to considerable stress and workload issues which must be addressed as part of any review of the system. The role of an independent AB has the potential to address some of these issues and ensure that all statutory duties are fulfilled, and that sufficient time is allowed for the duties and roles to be fulfilled.

Guidance was published for ABs in 2021, but there is still considerable variation across England. The more diverse the ABs, the greater the opportunity for divergence. Local Authorities are ideally placed to provide a consistent, independent Appropriate Body, but their role in education is being side-lined in favour of Teaching School Hubs which may lack the independence and experience of LAs.

The consultation document states that *“it is essential that all ABs prioritise their core role of checking the statutory entitlements that underpin every induction programme... it is especially important that we make sure all ECTs receive their statutory entitlements and that mentors are given sufficient time to conduct their role effectively to support their ECTs.”* The past two years have demonstrated the lack of capacity within the system. Schools are working with zero flexibilities to cover staff due to the high-levels of absence continuing to be driven by COVID-19. This makes it difficult to guarantee even statutory entitlements whilst maintaining ratios and safe staffing for pupils.

Ensuring that every ECT, Tutor, and Mentor knows who their Appropriate Body is and has the opportunity to contact them is an important part of the entitlement and enforcement jigsaw. Visits from ABs can be helpful but anything that disrupts the school day can have further detrimental impact on the ability of schools to provide adequate staffing for pupils and thus are often scheduled outside of the pupil day placing additional workload burden on an already stretched teacher, tutor and mentor.

It is important that the necessary burdens of the Early Career Framework are outweighed by the support and training and benefits that it may bring in terms of highly skilled practitioners remaining in the profession. If it adds unnecessarily to their burden, they will like so many others, be a part of the leaving statistics.

Q2. Based on your overall experience, to what extent do you agree that ABs are carrying out the following responsibilities of their role effectively?

(Please indicate on a scale from strongly disagree to strongly agree)

Strongly Agree / Agree / Neither Agree nor Disagree / Disagree / Strongly Disagree / Don't Know

Ensuring that ECTs receive their statutory entitlements (time off timetable, regular mentoring, etc).	Neither Agree nor Disagree
Ensuring that mentors and induction tutors have sufficient time and ability to undertake their roles effectively.	Disagree
Ensuring that schools have put in place an ECF-based induction programme and conduct ECF fidelity checks for schools who have chosen not to use one of the provider-led induction programmes.	Don't Know
Agreeing extensions or reductions to the length of the induction period for ECTs in line with statutory guidance.	Don't Know
Ensuring that where an ECT may be experiencing difficulties, action is taken to address areas of performance that require further development and support.	Neither Agree nor Disagree
Ensuring that where an institution is not fulfilling its responsibilities, contact is made with the institution to raise any concerns.	Don't Know
Ensuring that the monitoring, support, and assessment against the Teachers' Standards and guidance procedures in place are fair and appropriate.	Agree
Ensuring that ECTs have accurate induction records.	Agree
Ensuring that a fair and appropriate decision is made with regard to the headteachers' recommendation on whether ECTs have satisfactorily performed against the Teachers' Standards (pass/fail) at the end of the induction period.	Agree

Part 2: The value of formal assessment

Background context

Since September 2021, with the national roll out of the ECF reforms, ECTs now have access to a two-year structured programme of support based on the ECF. This has provided the statutory induction period for the first time with uniform content based on the best evidence of high-quality professional development needs for ECTs. The structured content of the ECF has had a positive impact on consistency and quality of the training and support an ECT receives during induction.

As set out in statutory guidance the ECF is not an assessment tool. Independent of ECF-based programmes, ECTs are separately assessed against the Teachers' Standards⁶ at regular points during their induction period, with the final formal assessment determining whether they pass or fail induction. Induction is an important step in a teacher's career providing them with a strong foundation and the tools to be an effective and successful teacher. Formal assessment plays a critical role in this step and ensures that only teachers who successfully meet the Teachers' Standards remain teaching in the maintained sector⁷.

To facilitate assessment against the standards, ECTs now have two formal assessment points: one midway through their induction period and another at the end. These formal assessment points are supported by progress reviews, one in each term where a formal assessment is not scheduled.

The statutory induction guidance⁸ is clear that gathering evidence should not be burdensome for the ECT and that there is no need to create new evidence for a formal assessment. However, we have heard that some schools have not understood the requirements or received sufficient guidance or assurance from their ABs that evidence gathering for assessment should be proportionate and based on existing evidence of the ECT's teaching. For some, this is creating a perceived – and needless – burden and bureaucracy. We are keen to test where guidance may need to be clarified or communicated more effectively to mitigate this.

In response to this perceived burden of assessment and the positive impact of the ECF reforms on the consistency and quality of induction programmes, some parts of the sector have challenged whether formal assessment, in its current form, is still necessary or whether there are any alternative mechanisms for managing ECT performance that would be as effective. However, we have also heard that connecting the end point of induction to the Teachers' Standards holds significant value for the profession. So, in considering options to date, we have not yet identified alternative proposals that would satisfy the requirements stakeholders have told us are fundamental in relation to protection for ECTs and the profession. We therefore want to test out what about the

⁶ Teachers' standards - GOV.UK (www.gov.uk)

⁷ There is no legal requirement to satisfactorily complete an induction period if an ECT intends to work solely in the independent sector, an academy, a free school, a BSO, an independent nursery school or an FE institution. However, it may be possible for an ECT to serve induction in these settings.

⁸ See paragraph 2.53 of the [Statutory Induction Guidance \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

current assessment system is valued, and what may need amendment to remain fit for purpose.

Matters for consultation

In the short term, to be implemented alongside the other 2023 reforms described in part 3 of this consultation, we are consulting only on how we can improve and streamline existing formal assessment processes and systems. We want to understand whether the systems supporting assessment are as efficient as they should be. We also want to hear whether there is more we can do to ensure that the two aspects of induction – training and assessment – are complementary and are not creating unnecessary and overlapping burdens on schools and ECTs.

While this consultation is seeking views on how we can ensure formal assessment processes are efficient in the short term, we would also like to hear about where the assessment process adds value and where, longer term, we could remove or reduce unnecessary burdens without losing the safeguards that exist to protect the interests of ECTs. We want to test wider views on the value that formal assessment holds to check that the benefits it adds outweigh any perceived burdens. These early views on the formal assessment process will support us in the longer term to consider whether the system, with adjustments remains fit for purpose, or whether reforming the way we mark the end of statutory teacher induction could improve the experience of schools, trusts and ECTs.

We know that any reform to how we mark the end of induction would represent a significant change to the teaching profession and therefore we will consider options for this over a longer timeframe whilst welcoming early views on which aspects of the current formal assessment process adds value to shape this longer-term thinking.

Questions

Q3. To what extent do you agree that the following aspects of the formal assessment process add value to the induction experience of ECTs and the teaching profession more generally?

(Please indicate on a scale from strongly disagree to strongly agree)

Strongly Agree / Agree / Neither Agree nor Disagree / Disagree / Strongly Disagree / Don't Know

Two formal assessment points, one midway through induction and another at the end of the induction period.	Agree
Progress reviews, one in each term where a formal assessment is not held.	Agree
Marking the end of induction through a pass/fail based on the ECT's performance against the Teachers' Standards.	Neither Agree nor Disagree
Independent verification of the headteacher's recommendation on pass/fail by the AB.	Agree

Part 3: The appropriate body sector

Background context

We will reform the AB sector so that in the future the AB role will be taken forward by the network of 87 TSHs. In addition to the TSHs, we will also have a small number of ABs for parts of the sector which require specialist provision. This means that longer term, LAs will no longer be able to act as an AB for any ECTs and we are proposing this takes effect from September 2023.

Lack of consistency in the quality and extent of AB services has remained an unresolved issue in the AB sector even with the more detailed AB guidance issued alongside the 2021 induction reforms. While core requirements are set out in statutory guidance, there is still flexibility around how and in how much depth ABs choose to deliver their services.

Many schools and trusts have worked incredibly hard to implement the ECF reforms so we need to ensure that ABs operate consistent, high-quality services that are fit for purpose in order to safeguard the fundamental entitlements that underpin an ECT's induction.

We are committed to ensuring that every AB conducts robust quality assurance processes for every school. We have already heard from the sector that a minority of schools switch their AB midway through an ECT's induction with the intention to avoid challenge from their original AB. We do not think that this practice is in the best interests of ECTs, and we want to ensure that schools which offer statutory induction adhere to the statutory guidance and regulations at all times. Therefore, as part of reforming the role of the AB and the scope of the sector following this consultation, we will consider how to prevent this practice from happening in the future unless there are exceptional circumstances (for example if they are moving to a different provider of the ECF-based programme).

We also know that the fees charged by ABs vary significantly between organisations. Regulations allow ABs to charge to cover their costs but inconsistencies in the way that they conduct their quality assurance has led to inconsistencies in cost. As a result, not all schools receive the same levels of service or value for money. This variation also leads to an unacceptable level of inconsistency in the level of checking applied to schools. We want all ABs to provide robust quality assurance to ensure that all ECTs receive access to entitlements and high-quality induction experiences, particularly where schools have chosen to deliver their own ECF-based induction programmes.

To address these issues of inconsistency, the department has previously committed to reviewing the quality assurance of ABs. Having considered further, we now think that the option previously discussed in the current AB guidance of accrediting all ABs to ensure that they meet a set of agreed criteria would likely create unnecessary layers of burden and bureaucracy which we expect would pass on additional costs to schools. We do not think there is a sufficiently strong value for money case to justify asking any part of the system to fund an external accreditation process or to increase the financial burden on schools for this purpose when there are more cost-effective alternative levers.

As part of this reform to make TSHs the main providers of AB services, we have also considered carefully how the size of the current sector has contributed to some of the inconsistencies we now see in the AB services that schools, trusts and ECTs receive. Limiting the AB role to TSHs means we can utilise existing quality assurance mechanisms through the contractual agreements we already hold with them, to achieve a greater level of consistency in services available to schools while also minimising the workload and cost burdens around quality assurance.

The role of the local authority

The AB sector has seen changes over the past decade which reflect the evolution of the school system. As a result, we have seen a decline in the number of LAs acting as ABs over recent years. At their inception, ABs were exclusively LAs but over time, some LAs have stepped back from the role to allow their local teaching schools, and now TSHs, to deliver AB services to their local areas while they have directed their resources elsewhere. While some who operate have significant experience and expertise and show great commitment to their ECTs, there are no direct accountability mechanisms to ensure quality across LA AB services. This creates a barrier to enabling quality assurance to resolve the long-standing issues around inconsistency in the AB sector.

This shift in the role of LAs is reflected more widely in the 'Opportunity for all' white paper which describes a future system with LAs at the heart as champions of the best interests of children in their area, as they step back from their role in directly maintaining schools. As such, we no longer see AB services as a suitable fit for LAs, who will be stepping into their new roles in coordinating local services to improve outcomes for children.

The role of the teaching school hubs⁹

The national network of 87 TSHs are school-led centres of excellence in professional development run by some of the country's best schools and trusts. TSHs form the backbone of the recent teacher and leader training and development reforms, ensuring all teachers and leaders have access to high-quality, evidence-informed training and development at every stage of their career. TSHs play a significant role in the delivery of school-based initial teacher training (ITT), ECF-based induction programmes, the new specialist national professional qualifications (NPQ), the reformed leadership NPQs, and delivering AB services for ECTs.

The department has a contract in place with each TSH and we hold them to account against key performance indicators. As part of this reform, we will work closely with the Teaching School Hubs Council (TSHC), the sector body for TSHs that provides a comprehensive programme of support to aid capacity building across the national network, to consider how we can strengthen this contract management to ensure consistent quality for all AB services.

As part of this reform, schools will be encouraged to use the TSH that makes the most sense for their circumstances, for most schools we would expect this to be their local

⁹ Teaching school hubs - GOV.UK (www.gov.uk)

TSH or their delivery partner for ECF-based induction programme. Larger trusts might make this choice based on the AB closest to the majority of their schools. Where a school's local TSH has a conflict of interest in delivering AB services to a specific school or ECT¹⁰, schools will have flexibility to make alternative arrangements with another TSH.

This year we agreed, by exception, that a small number of TSHs were not required to deliver AB services where their LA had sufficient AB provision. From September 2023, we will ensure that every TSH offers AB services so that every school has access to a TSH AB. We will work with TSHC and other partners, including National Teacher Accreditation (NTA), to ensure that TSHs build their readiness and capacity as we transition to this reform. Through our partnership with TSHC, we will ensure TSHs have the necessary support, training and resources required to build their capacity and expertise nationally, ensuring a smooth transition. We will prioritise the needs of TSHs new to the AB role to ensure a consistent standard of provision is established.

We would like to support a well-managed transition as we move towards this reform and will work with the TSHC and other organisations to support the process of transition and capacity building. We think that this will include, but is not limited to:

- Local or regional transition partnership groups, supporting existing partnerships and new relationships, including those between TSHs and LAs. These would facilitate sharing information and expertise, agreeing timescales for transfers, capacity planning, and managing the orderly transfer of ECTs effectively and where appropriate, identifying opportunities for staff transfers.
- Local and/or regional training for TSHs to build and share expertise on how they operate services. We are also working with our partners to build AB capacity in the TSH network as well as planning more broadly for an effective transition.

Matters for consultation

We know that significant change to the AB sector will pose some challenges. We will work with key partner organisations to support ABs and enable collaboration to ensure a well-managed transition whilst protecting the interests and experiences of ECTs taking part in induction during that period. We anticipate that these challenges will predominantly relate to building AB capacity and expertise in the TSH system, as well as winding down LA AB services.

We are proposing 31 August 2023 as the date that LAs would cease to operate as ABs. After this date, schools with LA ABs would need to transfer any ECTs part way through their induction to a TSH AB. A clear cut off date is in line with way that teaching school AB services were wound down, and is likely to be more viable for most LA ABs than asking them to operate until all the ECTs registered with them have completed their induction, particularly in view of the length of time it would take some ECTs on non-standard inductions to complete. It would serve the interests of schools and trusts with

¹⁰ For details of what constitutes a conflict of interest for a TSH offering AB services, please refer to [The Education \(Induction Arrangements for School Teachers\) \(England\) Regulations 2012 \(legislation.gov.uk\)](#)

ECTs at different stages of induction if they were able to register all ECTs with the same AB.

We recognise ABs, and the schools, trusts and LAs that they are part of, may need to consider the practical arrangements required to manage an orderly transition. This may include reorganising staff, terminating contracts or service agreements between schools and ABs, transferring ECTs mid-induction to new ABs, transferring ECT records, and making arrangements to maintain historic ECT records. We are committed to working with the sector to ensure a smooth transition and will provide guidance and support where it is needed. We will ask all TSHs to work collaboratively with their local LAs to ensure transition and transfer processes are well planned and managed with the interests of the ECTs who may be affected.

We are keen to hear views on our proposed timeline in relation to implementation delivery, as well as details of any possible implications of this reform on the sector that will need to be considered in transition planning.

Q4. Would a shift to a predominantly TSH AB sector from 1 September 2023 provide a sufficient transitional period for LAs to wind down their AB service provision and for TSHs to build their capacity to cover need?

No

If no or maybe, why is this not sufficient time and what length of time do you believe is needed to facilitate a successful transition?

The education system is in disarray. This fracturing has led to many different systems and inconsistency of approach. The impact of Local Authorities has been limited in favour of Teaching School Hubs and Multi-Academy Trusts without incontrovertible evidence that this is the most effective way of supporting and developing Early Career Teachers.

According to the consultation document, TSHs are *'school-led centres of excellence in professional development run by some of the country's best schools and trusts'* but where is the independent verification that the Trusts are 'some of the country's best' since trusts are not routinely inspected? And, should there be a change to the framework, or focus of inspection which caused a school's inspection grade to fall, what would happen to the TSH?

We understand that the Teaching School Hub Council are the regulatory body for TSHs, however this is not accountable to teachers or the sector in the same way that LAs are and this gives cause for concern. In fact, the website of the TSHC states that the TSHC has two specific functions:

'An advisory function – representing the network of teaching school hubs, engaging with and advising the Department for Education (DfE) on national policy; and a capacity building function – supporting the creation and growth of teaching school hubs, ensuring capacity for all areas of the teaching school hub remit.'

This suggests that regulatory oversight is not a key component of the work of TSHs but is a body dedicated to supporting TSH rather than holding them to independent account.

Like the consultation document, Community have concerns around the inconsistency of experience and cost that schools receive. We note that the department is aware of these and has taken some effort in seeking to address these issues of inconsistency. We wholeheartedly agree that placing any additional administrative burden such as a set of agreed criteria, would simply increase the bureaucracy and not lead to any meaningful quality assurance. It is, however, important that TSHs are independently regulated, and not just overseen by the TSHC who are appointed by the DfE.

Because of the considerable complexities surrounding Teaching School Hubs, particularly with regard to supporting ECTs within the trust from outside of the trust, coupled with a need to build capacity and experience, Community do not feel that 12 months is sufficient time to achieve this.

We note that the consultation document commits the department to work with TSHC and other partners, including National Teacher Accreditation (NTA), to ensure that TSHs build their readiness and capacity as we transition to this reform, but this capacity is not yet there. We would also expect that any partnership working would also include teacher unions and associations to ensure the voices of trainees, ETCs, mentors and tutors are all clearly heard in the regulatory process. With the current difficulties schools are experiencing regarding recruitment and retention, we do not believe this is something that is likely to be achieved in this timeframe.

Whatever plans the government have for Appropriate Body reform, we feel that that the independence, knowledge and skill of local authority Appropriate Bodies, *'some who ... have significant experience and expertise and show great commitment to their ECTs'* should not be wasted. Furthermore, the staff working in LAs must not be lost to the system. A method of achieving this could involve forming independent AB separated from the TSH to ensure that standards are properly maintained and maintaining the independence of the AB.

Q5. Do you believe this reform to the AB sector will cause any barriers or challenges for you, your organisation, or those you provide services for? If so, in what ways, and how can we help facilitate solutions to these challenges during the transitional period?

Your answer could include specific implications for your organisation including ending contractual obligations and other commitments, and any impacts (either positive or negative) on individuals with protected characteristics.

No

Q6. Do you have any other comments on the role of the ABs or statutory teacher induction?

As commented in our previous responses, we are not convinced that a move away from LA involvement in the ITT and Early Career Teacher reforms is sensible. Whilst bringing together all teacher training and development – including the Appropriate Body within Teaching School Hubs centralises the approach and could lead to some efficiencies, it is important to note that efficient does not equal better. We are particularly perturbed that LAs will no longer be able to act as an Appropriate Body and feel that the independence, knowledge and skill of local authority Appropriate Bodies, ‘some who ... have significant experience and expertise and show great commitment to their ECTs’ should not be wasted. Furthermore, the staff working in LAs must not be lost to the system. A method of achieving this could involve forming independent AB separated from the TSH to ensure that standards are properly maintained and maintaining the independence of the AB.

LAs are locally accountable, and, as is highlighted in the consultation document, schools are able to select alternative ABs, especially if that AB should not meet the needs of the school.

Currently induction regulations are not statutory for academies yet this change to the system of Appropriate Body will see TSH, as part of academies, charged with leading on and maintaining these standards which seems a rather unusual situation to create. Furthermore, TSH will always have a vested interest in the success of their trainees and ECTs where LAs were independent of the qualification process and rather more agnostic about an individual's success. And it will be difficult to hold TSH to account for things they have not themselves delivered such as being the AB for an ECT from outside the MAT.

There are some excellent academies and trusts. There are many excellent schools working in LAs. A flawed ideology that assumes that LAs are failing and therefore must be stripped of their role in education has led to defunding which has hastened academy conversions. We acknowledge the direction of travel towards a Teaching School Hub model, but we would advise caution with regards the time frame. Do not squander the skills, knowledge and experience of those working in LAs whilst they still exist.



Department
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