

**Teachers’ Union of Ireland**

**Response to Proposed Career Entry Professional Programme - CEPP**

**May 2012**

***Note: This written response re-iterates and expands the points made at a meeting between the three teacher unions and the Teaching Council and a general consultation forum, both of which took place in February 2012.***

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* **Introduction**

TUI endorses the need for strong induction support for newly qualified teachers (NQTs) and their effective probation into the teaching profession. It acknowledges that the proposed CEPP presents a wide range of ideas some of which will have a valuable role in the emergent induction support and the future approach to the probation of NQTs. However, through engagement with its Executive, branches and the general membership (teachers and principals) TUI has identified numerous concerns and issues in respect of the current proposals. Two very significant, general concerns are:

* **The merit and risks of combining induction and probation**
* **The future opportunity cost of becoming a teacher**

TUI is not convinced that the merging of induction support and probation is the best approach or the appropriate one for Ireland. Induction infers support while probation clearly refers to a formal evaluative process. Practice to date in these domains is underpinned by a culture and tradition that support collegiality and parity. Shifts in practice must be mindful of this and, therefore, must be carefully thought out and justified. Furthermore, blending induction and probation in the manner proposed may diminish or side-line the induction element and sacrifice the best of what was envisaged during the pilot induction programme supported by a broad range of education partners. For example, the NQT may be reluctant to confide or seek support in some instances from a person they know to be undertaking an evaluative role; the mentor may feel that the trust an NQT placed in them is compromised if they do not recommend probation at the end of the defined period.

A more significant concern for TUI is the future ‘opportunity cost’ of becoming a teacher. A rationale for the extended duration of Initial Teacher Education (ITE) programmes has been made explicit. TUI accepts an extension of the time required for completion of ITE is justified to some degree. Notwithstanding, a strong, substantiated justification for an additional year of full-time study for graduate diploma programmes (formally higher diploma) has not been forthcoming. The union remains unconvinced of the merit of this move. It believes the decision together with the withdrawal of grant support for post-graduate studies will be instrumental in dismantling the social mix of the teaching profession, further alienating those from the lower income groups. Furthermore, plans to introduce a CEPP which will extend the pre-registration phase to seven years for many, the severity of pay decreases imposed on new entrants to teaching (above and beyond other public or civil servants), a lack of reasonable employment opportunities and the increasing casualization of teaching, represent considerable disincentives to pursuing a career in post-primary teaching. Together these issues constitute a significant threat to attracting ‘the right’ people into the teaching profession. To avert the strong possibility of post-primary teaching becoming ‘unattractive, unattainable and unsustainable’ for many young people TUI recommends that the plan to extend the graduate diploma to two years (full-time) be reconsidered. It advocates that an alternative approach to extending graduate ITE programmes and introducing a CEPP be explored, so that both can be achieved within a two year timeframe. No doubt a number of complexities and obstacles will emerge in such an approach. However, it is beholding on all the players to engage with this idea, as well as examining a ‘placement scheme’ to enable all graduates complete CEPP promptly and quickly.

Further issues in respect of the current proposals for a CEPP include the:

* **Introduction of CEPP when resources are restricted and capacity to embrace change effectively low;**
* **Implicit risk to teachers’ and principals’ conditions of work as a consequence of the measures and approaches proposed;**
* **Level and nature of work proposed for NQTs in respect of in-school and out-of-school strands;**
* **Level and nature of work proposed for experienced teachers who act as mentors and principals;**
* **Settings for, timeframe for and duration of CEPP;**
* **Concepts of a professional portfolio and reflective practice;**
* **Certification and accreditation of CEPP related activities;**
* **Quality assurance approaches advocated;**
* **Timeframe for transitional and review arrangements.**

These issues are addressed below in more detail and TUI hopes the arguments will inform considered revision of the ideas and approach set out in the CEPP Consultation Document – January 2012.

* **Introduction of a CEPP when resources and capacity are low**

A significant concern for TUI is the general and specialist capacity to embrace the proposed CEPP at a time when resources have been stripped out of the system and schools. In a recent survey TUI established that by September 2012 many schools will have lost between three and four teachers and up to five promoted posts since 2008. Therefore, schools are finding it increasingly difficult to deliver essential services and supports to students for example pastoral care, wide curriculum and subject options, co-curricular activities and extra- curricular activities. Capacity to embrace a new initiative of the magnitude of the proposed CEPP and implement it effectively is extremely low.

Coupled with other changes that are under development and scheduled for system-wide implementation between 2014 and 2017 (for example, extended ITE school placement, a new Junior Cycle) the proposed CEPP constitutes a level of change that could inadvertently lead to system failure. Schools simply will not have the capacity to undertake the programme of work envisaged. This risk runs parallel to expectations such as ‘innovative, integrated and improved entry into the teaching profession’ or transition to independent practice as a ‘positive and professional experience’.

* **Risk to teachers’ and principals’ conditions of work**

TUI believes the measures and approaches in the proposed CEPP, if implemented, would represent a major change to the conditions of work for principals and for the experienced teachers involved. The consultation document does not make sufficient reference to this or adequately acknowledge that such issues must be the subject of discussions in other fora. A future iteration of a CEPP must address this and clearly indicate that full implementation will be subject to appropriate discussion and agreement on this issue between the parties involved.

* **Level and nature of work for newly qualified teachers - in-school and out-of-school**

Career entry is a sensitive and demanding transition for NQTs. TUI has long advocated that a strong and comprehensive induction programme should be in place for all NQTs. Notwithstanding, it is important that the demands emanating from this with respect to the time involved, level of engagement needed and formalities expected are realistic and manageable. In this regard, TUI is somewhat concerned about a number of the elements in the proposed CEPP.

***In-school strand***

Notably, the emphasis on a personalised programme of professional development co-ordinated by a mentor, the maintenance of a professional portfolio and the number of formal/informal meetings and observation sessions with the mentor and principal are among the significant concerns. All of these dimensions have something to offer but as currently outlined TUI believes they have the potential to place unrealistic time and emotional demands on NQTs. Therefore, they could in reality be counterproductive to a positive, well supported career entry experience.

***Out-of-school strand***

TUI is not opposed to out-of-school support for NQTs. This measure will have special value in assisting NQTs from different schools to meet and support each other in a safe, confidential and facilitated manner. TUI accepts that it may be appropriate that such workshops take place outside the normal school schedule. Nevertheless, it argues that NQTs should be facilitated by having a portion of their timetabled hours set against the out-of-school hours involved. It is also mindful that some NQTs may incur significant costs arising from the necessity to travel considerable distance to participate in workshops. In this regard, it expects that NQTs will have access to appropriate travel and subsistence costs.

The draft proposal commits to designing workshops that meet the personalised, specific needs of the participating NQTs. TUI, however, is concerned that this element may largely turn into a series of mandatory workshops on Department selected or dictated themes, which would undermine the emphasis on a reflective and individual focus in the career entry phase. A further point that requires some clarification and justification is the reference to the principal inspecting the certificate of completion. Surely, evidence of participation is simply a matter of record?

***Dealing with NQT’s concerns (section 5, page 14)***

Is the heading of the section misleading? As worded it suggests the section should also comprehend how a mentor or principal should deal with concerns raised by the NQT.

The reference to formally and informally raising concerns with a mentor is vague and may benefit from further clarification for example - how exactly to raise the issue formally?

A further question that arises is - what would an intervention by the NIPT look like and how might it transact?

***The National Induction Programme for Teachers (NIPT)***

TUI acknowledges that the NIPT will be involved in supporting and managing the out-of-school strand. It further accepts that some NQTs will need more external support than others. However, it advocates that the NIPT role in the in-school strand be increased and that each NQT should have at least one in-school support visit from a member of the NIPT Team, as well as telephone and web support. Visits from the NIPT should not be confined to those NQTs considered by a mentor or principal to have, or self-identified as having, particular difficulty - rather these individuals should have access to additional visits. Up to now principals and teachers have not been involved in evaluating new entrants for probation into the profession. In view of this tradition, TUI holds that the NIPT should have a stronger role in any new model and/or it should have responsibility for organising a team of external evaluators that can work with and support schools in this area.

* **Level and nature of work for experienced teachers and principals**

Designing a development programme, providing individual support, conducting observations, giving feedback, making judgements, evaluating a colleague, making a report and ‘sign-off’ are among the core activities envisaged for experienced teachers and principals.

Such activities demand and merit considerable investment of time by the experienced teachers and principals involved. Allocated ‘staff time’ to reflect this will be necessary for schools hosting NQTs. Of equal importance is the development of professional skills and capacity within the current pool of teachers and principals in respect of areas such as designing support/development plans, observing another professional in practice, making judgments, giving feedback. The current document does not adequately set out the nature and extent of professional development support that will be needed by teachers and principals or how it will be resourced. Nor does it adequately reflect a commitment to make provision for this in a timely and appropriate manner.

While point 3.10 (page 3) suggests ‘discrete time should be set aside by schools…’ this is not achievable without undermining another area of service provision, unless the Department makes provision for appropriate additional resource allocations to schools.

***Standards for full registration***

TUI notes that a key responsibility of the mentor and/or principal is to take account of the standards for full registration in forming a view on the NQT’s capabilities. It considers that the broad indictors set out on page 11 are valid and justified. However, it considers the standards for full registration set out on pages 12-13 are in some respects too extensive and pedantic in nature and, therefore, will place unreasonable demands on the mentor and principal. How are the principal and mentor expected to determine whether and to what extent an NQT has engaged with educational literature and research? What is surely more important is the classroom practice of the NQT, their general integration within the school community and engagement with the staff and pupils. How could the mentor, who will be a subject specialist in the post-primary context, be expected to determine if lesson objectives set out by an NQT in a different discipline/subject area ‘are clear and appropriate…’

The level of attention to this area in the CEPP programme begs the question as to what is expected of ITE and to what extent ITE programmes are designed to build, identify and address important issues of competence and suitability during the ITE phase. TUI accepts the process nature of becoming a competent teacher and on building on the standards reached on completion of ITE during a career entry phase. However, it believes that the substantive issue of establishing capacity and competence to teach should be addressed during ITE, especially in the context of a new extended programme of school placement.

***Completion and submission of final report by principals***

TUI endorses the idea of self-regulation. In keeping with this it accepts that practicing professionals (teachers and principals) have a key role in supporting NQTs into the profession and evaluating their practice in some fashion. However, mindful of traditions and in the interests of the maintaining collegial relationships, it believes there should be a strong external involvement in the final evaluative process. A number of approaches that are cost and expertise efficient and trustworthy could be explored in this regard for example, drawing on the experience and time of recently retired teachers and principals and strong involvement of the NIPT Team.

With particular reference to point 4.1.6, TUI is not convinced it is necessary or appropriate to require the principal to sign and submit the final report to the Teaching Council in cases where they have, for very specific reasons, involved the Inspectorate and or the NIPT Team in the process.

* **Settings for, timeframe for and duration of CEPP**

***Settings for completion***

As a basic principle, TUI considers it should be possible and valid to complete a CEPP in settings other than post-primary schools and settings recognised under Section 10 of the Education Act. In particular, it emphasises the further and adult education area and notes that the teaching experience in these contexts, while different, is equally valid. In any case into the future there may, in reality, be more opportunities to secure teaching hours in non-mainstream contexts than in post-primary schools.

***Timeframe for completion and obtaining full registration***

TUI welcomes the statement that a CEPP should be available to all NQTs who have conditional registration and that, at a minimum, a three year timeframe will be permitted to enable completion. However, given current employment difficulties for new graduates, some of whom may be forced to leave the country or work in a non-teaching area in Ireland, this timeframe may be unrealistic, unfair and unduly punitive. What in reality will this mean – on expiry of the three year period will a person have to complete a full ITE programme a second time at an additional cost? Will provision be made for people to attend refresher seminars, complete assignments or undertake a limited school placement to demonstrate they have retained their knowledge and competence? Where does the recognition of prior come in? TUI advocates this issue be examined in greater detail and further clarification and justification for decisions provided, together with clear strategies to support those who fail to obtain employment within the suggested timeframe.

***Duration of CEPP - post-primary context***

Notwithstanding a number of concerns about the defined timeframe for completion of a CEPP, TUI’s primary concern is that many NQTs will be unable to secure the level of hours required. The current approach appears to be predicated on the primary school context where most teachers are likely to secure in excess of the required number of hours in one year, in one school. This does not reflect the reality of the post-primary context. There is currently a strong tendency to recruit teachers on a casual part-time basis in the first instance. In many cases, an NQT may only secure a small number of hours for example, 6 hours a week over a year (less in some cases), falling well short of the total required hours under the proposed CEPP.

Furthermore, some post-primary NQTs may have hours in two different schools/centres. Even where a person is in one centre for a full year they may not reach the hours requirements in their core curricular area. The draft document suggests that the CEPP can be completed over more than one year and across more than one centre. This will almost inevitability make the CEPP experience more difficult. This will especially be the case where more than one centre is involved and, therefore, most likely more than one co-ordinating teacher/mentor and principal.

TUI advocates that the possibility of a placement scheme be explored in order that those NQTs who do not secure a teaching position or the prerequisite number of hours can be accommodated within one academic year and in one centre/school. Such a placement scheme could enable:

* teachers who have some teaching hours obtain additional hours to reach the minimum hours required
* teachers who do not secure teaching hours to be placed in an appropriate setting to complete the CEPP as soon as possible on obtaining an ITE qualification
* schools to accommodate CEPP activities as the placement approach could allow teaching staff to be released from normal teaching responsibilities to support overall co-ordination and support activities.

However, the protocols underpinning a placement scheme would have to ensure that:

* the teacher allocation under the pupil:teacher ratio would remain in place and exclude the ‘placed’ NQT
* no displacement of current part-time teachers or diminution of their hours would arise as a consequence of a placement scheme for an NQT
* the NQTs on placement receive an appropriate level of remuneration for their time.

TUI advises that a comprehensive examination of the possibilities of a beneficial placement scheme be examined and mapped out in detail for discussion with the teacher unions and other key partners.

* **Concepts of the professional portfolio and reflective practice**

The concept of reflective practitioner is supported by TUI. However, this concept is not, as yet, well developed within the teaching profession in Ireland. It is implicitly process driven and will require considerable support and sensitive management at a number of levels.

Maintaining ‘some record’ of professional experiences is no doubt valuable in supporting reflective practice by oneself and with peers. However, the idea of maintaining a professional portfolio as part of a CEPP presents difficulties for TUI (as outlined in its earlier response to the draft policy on the continuum of teacher education). For example, evaluation of the portfolio by the mentor may become the key driver as opposed to a genuine commitment to documenting reflective practice. TUI also re-iterates its concern that there has been no discussion or agreement between the education partners about what keeping the portfolio will entail, who will have access to it and or for what purpose(s) it will be used?

It further notes, that there is a clear difference between a professional portfolio designed to meet academic rigour as part of ITE and one that assists on-going reflection of professional practice. TUI considers terminology such as a personal journal may, in fact, be more appropriate to the expected outcome. In any case, how best or appropriately a ‘personal journal’ or ‘professional portfolio’ should be maintained by a practicing teacher requires careful exploration and must have due regard to the time available and the personal nature of the activity.

Given the newness and underdeveloped nature of the concept of a professional portfolio and the ambiguity around it is questionable if it should be given such prominence at this stage. A professional portfolio is but one supporting tool, therefore, TUI suggests that reference to it in Figure 1 (page 4) or any such diagram in a further profile of a CEPP be deleted until greater understanding and consensus is reached on what it actually encompasses and how it will be managed.

* **Certification / Accreditation of CEPP**

TUI accepts that certification, and in some instances accreditation, is appropriate with regard to CEPP related activities. However, it considers that reference to these requires greater clarification as to the status and function of each. In particular, it holds that formal accreditation, with particular reference to credits towards qualifications, should be optional. The need for experienced teachers to become involved in CEPP will be system wide. The idea of undertaking formal accreditation towards an academic qualification may act as an incentive for some to participate but a disincentive to others. Efforts in this regard must, therefore, be respectful to the needs and interests of both groups.

The task of becoming an experienced teacher is difficult, challenging and demanding. Some NQTs may immediately wish to combine CEPP effort with opportunities for additional, formal academic accreditation; others may not or may wish to consider this at a later time through a process of recognition of prior learning. A number of approaches should be accommodated and respected.

* **Quality Assurance**

Robust quality assurance will be important and systems must be appropriate and relevant. TUI endorses the idea that the inspectorate should visit a number of schools annually in this regard. It is, however, not convinced that the CEPP should become the subject of a whole- school evaluation (WSE) in the short term. It considers that an agreed model for CEPP should be allowed bed into the system before such an approach to quality assurance would be justified or fair to the players involved. It, therefore, recommends a decision to evaluate a school’s approach to CEPP through a WSE be delayed until an agreed programme has been implemented for four or five years and reviewed. It accepts, however, the Inspectorate could be engaged in the review process.

* **Transitional and Review Arrangements**

The proposed CEPP is being designed in the context of the impending extension of ITE programmes (in most instances) and extended school placement during ITE. TUI believes it would be premature to agree and introduce a separate carer entry programme in this context. If the ideas are to be pursued separately, the extended ITE and associated school placement should be bedded into the system first and a real sense of what it is achieving established before formalising a career entry programme that blends induction and probation. Indeed, the proposed career entry programme to some extent begs the question as to why ITE and its associated school placement are being extended at all.

Given the number of issues in respect of a revised model of ITE and a new CEPP that merit deeper examination and exploration TUI believes that the timescale for the introduction of any transitional arrangements or new arrangements for probation into the profession must be set aside. In tandem, the timescale for a full review must also be delayed to allow appropriate experience to emerge to inform a review process. To proceed with the current timescales is to introduce a level of discontent and anxiety that is wholly unnecessary and unhelpful.

**In conclusion:**

TUI lends support to the idea of robust and timely career entry support for teachers that addresses induction support needs and probation into the profession. However it:

* Is not convinced that the integration of induction support and probation activity is the best and appropriate way forward in Ireland.
* Believes the current proposals for CEPP are not well thought out in the context of the current environment and other developments in ITE. Therefore, they should be set aside and alternative, more reasonable, realistic approaches examined in considerable detail.
* Advocates that a placement scheme that respects the integrity of the process and the profession should be explored to facilitate timely and prompt completion of CEPP by NQTs in a well-supported environment.
* Believes any future proposal for a CEPP must make more explicit reference to the nature and type of support and resources necessary to ensure effective implementation.
* Advises that current timescales for the introduction of a CEPP and any appropriate transitional arrangements be set aside to allow more comprehensive exploration of possible approaches and adequate public consultation.

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