



Department  
for Education

# **Appropriate body reform and induction assessment**

**Government consultation response**

**November 2022**

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## Introduction

As part of the Department's commitment to creating a world class teacher development system, teacher induction has seen significant reforms, introduced in September 2021, to ensure new teachers are supported with high quality training based on the Early Career Framework<sup>1</sup> (ECF). The ECF is designed to help early career teachers (ECTs) succeed at the start of their teaching careers and provide them with a solid foundation for a long career in the profession.

To engage fully with the ECF, the changes to the support for ECTs have seen the length of induction being extended to two years of support, as well as a DfE-funded provider-led programme based on the ECF which is available to all ECTs working in eligible schools and delivered by DfE-funded training providers<sup>2</sup>.

There are three approaches schools can choose to enable the delivery of an ECF-based training programme, which are:

- A DfE-funded provider-led programme.
- Schools deliver their own training using DfE accredited materials and resources.
- Schools design and deliver their own two-year induction programme for ECTs based on the ECF.

The DfE-funded provider-led ECF-based training route provides ECTs with a trained mentor throughout the induction process. These two years also entail regular progress reviews and assessment points to assist with professional discussions and to identify areas for ECTs to develop their teaching knowledge, skills, and practice.

Appropriate bodies (ABs) are responsible for the quality assurance of induction. They have a statutory role of ensuring ECTs receive entitlements to mentoring and time off timetable during induction and verifying the ECT's assessment against the Teachers' Standards<sup>3</sup> to pass induction.

It is essential to the successful delivery of induction reforms that we ensure ABs are fit for purpose and accountable, and that there is greater consistency in the AB services that

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<sup>1</sup> <https://www.gov.uk/government/publications/early-career-framework>

<sup>2</sup> [Schools can choose from 6 training providers. These organisations are known as 'lead providers'. The 6 lead providers are: Ambition Institute, Best Practice Network \(home of Outstanding Leaders Partnership\), Capita, Education Development Trust, Teach First, UCL Institute of Education, and from AY 2023/24, the National Institute of Teaching.](#)

<sup>3</sup> <https://www.gov.uk/government/publications/teachers-standards>

schools receive. Following these reforms to induction, we committed to reviewing the role of ABs to make sure that these organisations deliver their critical statutory functions effectively.

The white paper, '*Opportunity for all: strong schools with great teachers for your child*'<sup>4</sup> published earlier this year committed the Government to reforming the role of ABs in light of the feedback received following the implementation of ECF-based training programmes. This white paper also outlined the changing role of local authorities and a focus on moving towards a fully trust led system which has informed the proposed reforms to who can operate as an AB.

These changes to induction, and the commitment to reviewing the role of ABs, led to the consultation on AB reforms and induction assessment. This online consultation was launched on 26 May 2022 and ended on 21 July 2022. Conversations were also held with key stakeholders during this time. The consultation sought views on three areas:

- 1) How ABs can perform their role effectively. This focused on the systems in place for statutory induction including checking entitlements and supporting ECT progress, as well as any barriers that ABs face in carrying out their role effectively.
- 2) Induction assessment process. This focused on how far the assessment process during induction adds value to ECTs, schools and the profession more broadly.
- 3) Reforms to who can operate as an AB. This focused on the transition period of transferring the role of AB from local authorities to teaching school hubs (TSHs), including any challenges that organisations would face because of these reforms.

This document outlines the findings of these three areas that were consulted on and the Government's response to the findings.

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<sup>4</sup> <https://www.gov.uk/government/publications/opportunity-for-all-strong-schools-with-great-teachers-for-your-child>

## Summary of responses received

The appropriate body reforms and induction assessment consultation received 332 responses. The consultation saw responses from a range of different types of organisations, including:

- Local authorities
- Teaching school hubs
- National appropriate bodies
- Maintained schools
- Academy trusts
- Independent schools
- British schools overseas
- ECF Lead Providers

From these organisations, we received responses from those with roles including:

- Appropriate body
- Head teacher
- School/trust leader
- Induction tutor
- Mentor
- Early career teacher
- Teacher (non ECT)
- ECF-based training provider
- School governor

329 of the 332 responses were submitted online. Three responses were submitted via email as Word or PDF documents. Of these responses submitted by via email, two followed the structure of the consultation so this data was included in the analysis of the quantitative data. The remaining response that did not follow the structure was not included in the quantitative analysis but was included as part of the qualitative data analysis.

A further breakdown of those that responded to the consultation can be found in Annex A, and the total number of responses per question is provided in Annex B.

# Question analysis

## Part 1: The appropriate body role

### Question 1

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

**Summary of responses:** Various barriers were reported by those who responded to this question. A large number of these barriers related to ABs' ability or capacity to carry out their role in checking entitlements, including their regulatory powers to enforce these entitlements. Others centred around ABs' expertise and their understanding of the schools and ECTs that they work with. A number of responses also suggested that there were no notable barriers faced by ABs.

#### **Key findings:**

The most common barrier noted by respondents was around capacity, including ABs having sufficient time and resource to carry out their role fully, especially where the AB is working with a large number of schools and ECTs. The responses indicated that this is especially the case in the AB's role in checking that those serving induction are receiving their entitlements rather than relying on the information being given by schools.

Other barriers reported in the responses included:

- ABs not understanding the school's context or having an effective relationship with the school and ECTs. A number of comments indicated that this barrier was more prevalent where the AB works with a large number of schools and ECTs, with respondents suggesting this reduces the strength and quality of relationships between the AB and schools. Some commented that the AB requires local knowledge of the school to fully support it, noting how far schools can vary, even within a similar geographical area. Both local authority ABs and schools in particular noted that where an AB lacked expertise then this could be a barrier to that AB carrying out their role effectively.
- ABs not having access to data on how ECTs are engaging with ECF-based training. Some reported that this means that ABs do not have a full view of the ECT's induction (although to note engagement data does not form part of an ECT's formal assessment against the Teachers' Standards). Additionally, some noted that the process for induction is burdensome for schools due to the need to register and work with several organisations.

- ABs not having adequate regulatory powers to enforce the guidance. Some commented that this makes the role of the AB less effective in instances where schools are not complying with guidance and regulations.
- Schools facing difficulty in implementing the entitlements. Responses suggested that this is due to cost and workload burdens associated with these entitlements; in particular local authorities reported concerns around school workloads. Furthermore, some responded that some schools do not fully understand the roles of the different organisations they work with (e.g., ECF delivery partners) which can make it more difficult for the AB to carry out their roles.

A number of respondents also stated that ABs did not face any barriers to checking statutory entitlements. These comments often related to AB services offered by local authorities. The reasons that respondents gave for no issues being faced often focused on the strength of ABs' relationships, experience, and, in the case of local authority ABs, independence from ECF-based training providers.

## Question 2

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

**Summary of responses:** Across all aspects of the AB role, most respondents agreed or strongly agreed that ABs are effective in their role. This level of agreement was high across almost all aspects of the role consulted on. Where concerns were raised, the main issues were around the robustness of entitlement checking, particularly around mentoring. Responses demonstrated that there is significant variety in how often and how robustly ABs check these entitlements.

**Table 1: Based on your overall experience, to what extent do you agree that ABs are carrying out the following responsibilities of their role effectively?**

<b>Sub question</b>	<b>Strongly disagree</b>	<b>Disagree</b>	<b>Neither agree nor disagree</b>	<b>Agree</b>	<b>Strongly agree</b>	<b>Don't know</b>	<b>Not answered</b>
Ensuring that ECTs receive their statutory entitlements (time off timetable, regular mentoring, etc).	1%	5%	9%	32%	48%	3%	2%
Ensuring that mentors and induction tutors have sufficient time and ability to undertake their roles effectively.	3%	10%	15%	39%	29%	2%	2%
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.	1%	3%	9%	25%	52%	8%	1%
Agreeing extensions or reductions to the length of the induction period for ECTs in line with statutory guidance.	1%	1%	10%	19%	53%	14%	2%
Ensuring that where an ECT may be experiencing difficulties, action is taken to address areas of performance that require further development and support.	2%	3%	10%	20%	50%	11%	1%
Ensuring that where an institution is not fulfilling its responsibilities, contact is made with the institution to raise any concerns.	1%	3%	11%	20%	44%	19%	2%
Ensuring that the monitoring, support, and assessment against the Teachers' Standards and guidance procedures in place are fair and appropriate.	1%	2%	8%	29%	54%	5%	1%
Ensuring that ECTs have accurate induction records.	2%	4%	7%	28%	51%	6%	2%
Ensuring that a fair and appropriate decision is made with regard to the head teacher's recommendation on whether ECTs have satisfactorily performed against the Teachers' Standards (pass/fail) at the end of the induction period.	2%	2%	8%	24%	56%	8%	1%

*Percentages represent 331 responses included in the quantitative analysis (note that percentages have been rounded so may not sum to 100%).*



## Key findings:

Across all areas of the AB role outlined in the consultation question, there was overall a high level of agreement across all types of respondents, that ABs are effective in their role.

- The proportion of respondents who strongly agreed or agreed that ABs are effective was above 70% for all but two areas of the role.

The aspects of the role where the most respondents agreed or strongly agreed that ABs are effective were around:

- Monitoring and verifying assessment against the Teachers' Standards (83% of respondents)
- Ensuring ECTs receive statutory entitlements (80% of respondents)
- Ensuring ECTs receive fair pass/fail decisions at the end of induction (80% of respondents).

The two aspects of the role where the fewest respondents agreed or strongly agreed that ABs are effective were around:

- Ensuring mentors and induction tutors have sufficient time/ability for their role, where 68% of respondents agreed or strongly agreed, with 13% disagreeing or strongly disagreeing and 15% neither agreeing nor disagreeing.
- Contacting institutions not fulfilling their responsibilities, where 64% of respondents agreed or strongly agreed, with 4% disagreeing or strongly disagreeing and 11% neither agreeing nor disagreeing. This aspect of the role also had the highest proportion of respondents who did not know or answer (21%).

In the comments provided by respondents, the main issues raised focused on entitlement checking for ECTs, particularly around mentoring and the effectiveness of AB checks on ensuring mentors have sufficient time for their role. Reasons given referred to a number of barriers, several of which were similar to those mentioned in responses to Question 1. These included:

- limited data available to ABs to check entitlements;
- insufficient checks on mentors' timetables;
- lack of AB capacity to verify the accuracy of what schools report on providing entitlements;
- uncertainty around how much time is sufficient;

- lack of AB powers to require schools to offer more time to mentors; and
- the challenges faced by schools in providing adequate time due to workload and resource pressures.

Other issues that were raised less frequently in responses included:

- instances where schools felt their concerns about an ECT had not been acted on quickly or effectively by their AB;
- issues of workload and duplication created where online platforms for AB and ECF-based training provider systems are not aligned; and
- some concerns around variability of approaches to fidelity checking the content and structure of ECF-based training that schools are providing when they are not using the provider-led route.

While the consultation only requested a text explanation where respondents disagreed with the effectiveness of ABs, a number also highlighted their positive experience, especially in relation to:

- the quality of service, relationships, and expertise of their AB in providing advice and guidance; and
- the value in how their AB supports ECTs including those facing challenges and those requiring support with extensions or reductions to the induction period.

## Questions 1 & 2 Government response

### AB role and expectations

It is clear from responses that there are aspects of the AB role that are being conducted inconsistently and there is some uncertainty about the expectations for ABs. The clearest example of this is the AB role of checking that ECTs are receiving their statutory entitlements (such as a reduced timetable, and regular mentoring). ABs have a responsibility to ensure that statutory entitlements are being provided and will continue to have some flexibility over how they do this. Where we believe it would add value, we will update guidance for ABs and work with the teaching school hubs council (TSHC) to set clearer expectations for how ABs should conduct their role.

The Department does not intend to set a rigid framework that dictates how ABs must undertake every aspect of their role as we know that context can play a big part in the way ABs operate, but we will issue guidance that clarifies expectations on certain aspects of the AB role. We expect that this will include more information about:

- how and when ABs should be checking that entitlements are being provided to ECTs;
- AB quality assurance checks and visits to schools, including what might raise a cause for concern and what the options for escalating issues are;
- AB responsibilities towards progress reviews and formal assessments (further detail on this point can be found in the Government response to Q3 in part 2 of this document); and
- approaches to fidelity checking where schools are not offering ECF-based training through the provider-led programmes.

We also acknowledge the concerns that ABs do not have sufficient powers to conduct their role effectively. We understand that most schools do comply with guidance and regulations without any issues, and there is existing guidance to support ABs in escalating any causes for concern where they need to. We do not believe that it would be proportionate to create new regulatory powers for ABs. We will however ensure that all ABs are made aware of the existing routes for escalation and review this guidance to test whether it would benefit from any further clarification. Alongside this we will be continuing to raise awareness in schools of ECTs' entitlements and the funding they receive to support time off timetable for ECTs and their mentors.

Responses were clear that strong relationships are at the heart of successful AB services and that some ABs, both TSHs and local authorities, do this exceptionally well. We are committed to ensuring this reform increases the quality and consistency of AB services. Part of our clarified guidance will include making our expectations clear that strong relationships with schools, and a good understanding of schools' contexts, are a critical aspect of the AB role that underpin a successful service.

We will share these clarified expectations with all ABs as soon as possible, through regular updates and revised statutory guidance next year.

### Mentoring

We know from the free text comments that the reports of how effective ABs are at checking mentoring and induction tutor entitlements are part of a broader set of issues around mentoring, such as the concern about mentors' capacity to fulfil their role in provider-led ECF-based training programmes, and confusion around funding.

It is important that mentors and induction tutors are given adequate time to carry out their roles effectively so that they can meet the needs of their ECTs. We have been clear that schools should timetable ECT and mentor sessions during teaching hours wherever possible, as schools receive DfE funding to cover time off timetable.

To support ECTs through regular one to one mentoring sessions, the Department funds mentors' time off timetable. In Year 1, ECTs can expect the equivalent of a weekly mentoring session which amounts to 40 hours of time off timetable for mentors. In Year 2 ECTs can expect the equivalent of a fortnightly mentoring session, which amounts 20 hours of time off timetable for mentors. As was the case prior to the ECF reforms, the National Funding Formula, which is paid to schools via the dedicated schools grant, includes funding which can be spent on mentors' time off timetable in Year 1. Mentors' time off timetable in Year 2 is funded from the ECF reforms and is paid to academies or local authorities directly, in arrears. In some exceptional circumstances, where schools require flexibility due to timetabling constraints, mentoring may take place outside of teaching hours but should always be scheduled within contracted time.

Where ABs have concerns over the amount of mentoring an ECT is receiving or the time available for mentors to carry out their role, they are expected to work with the head teacher to resolve the issue. When asked, schools are expected to explain to their AB when mentoring is taking place and demonstrate that mentors are receiving adequate time to undertake the role. If the issues cannot be resolved with the school, ABs may seek to engage the governing body as appropriate and in exceptional circumstances, where a concern cannot be resolved with the school or governing body, the AB can notify the Department for Education who will consider appropriate action on an individual basis. Our clarified guidance to ABs will include how and when ABs should verify that mentoring is taking place in schools.

More broadly than this consultation, we have also listened to the feedback on the provider-led ECF-based training programmes and are working on making improvements. With regard to flexibility, we are working with our ECF lead providers to allow greater flexibility in when the mentor training programme commences. In addition, we are producing guidance for ECF lead providers on how ECTs and mentors can be supported to understand and apply the content of the provider-led ECF-based training programmes to their particular context and role.

We expect that some of the difficulties that ABs have faced with regard to checking mentoring entitlements during 2021/22 will be eased by these measures and ongoing support to schools to ensure that mentoring works more effectively. ABs have a unique role in monitoring and observing the implementation of mentoring and we will continue to listen to feedback.

### Digital

We acknowledge that there is currently some duplication of effort for schools and ABs with the requirement for the AB to register the induction with the Teaching Regulation Agency (TRA) and separately for the school to register for the ECF-based training on the DfE's **Manage training for early career teachers** service. It has been necessary to

develop this new service separately in the first instance, but we intend to further develop the registration service to consolidate the registration requirements under a single service. We will continue to work with ABs to ensure these developments reduce the administrative burden and identify the appropriate time to introduce this development.

There were also concerns that ABs do not have sufficient access to data on how ECTs are engaging with ECF-based training. We have been developing a new **Check data about early career teachers** service which will help an AB access data about ECTs that have been identified as being supported by the AB. This will allow ABs to access basic data such as training status and training provider. We are keen to work with ABs to gather feedback on this initial version of the **Check Data** service so we can improve its functionality.

### Clarifications

Amongst the responses for these questions, there were also some misconceptions about ABs and induction which were reported as challenges and barriers, including confusion about registration processes as well as the responsibility of induction tutors to provide copies of formal assessment reports to their AB. We will share further guidance to address these clarifications in due course.

## **Part 2: The value of formal assessment**

### **Question 3**

**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?**

**Summary of responses:** There was a high level of agreement across all types of respondents that the current aspects of induction referred to in the question add value to the induction experience of ECTs and the teaching profession more generally. Where respondents disagreed or strongly disagreed that the aspects add value, the main areas of concern identified were around workload burdens. Where respondents selected “Don’t know” or “Neither agree nor disagree”, many commented that it is too early in the reformed induction cycle to comment, because the current system was only rolled out nationally in September 2021, meaning that for the majority of the country, ECTs have not yet completed assessment as part of a full 2 year induction cycle under the new system.

**Table 2: 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?**

<b>Sub question</b>	<b>Strongly disagree</b>	<b>Disagree</b>	<b>Neither agree nor disagree</b>	<b>Agree</b>	<b>Strongly agree</b>	<b>Don't know</b>	<b>Not answered</b>
Two formal assessment points, one midway through induction and another at the end of the induction period.	2%	7%	10%	35%	45%	1%	1%
Progress reviews, one in each term where a formal assessment is not held.	1%	5%	7%	40%	45%	1%	1%
Marking the end of induction through a pass/fail based on the ECT's performance against the Teachers' Standards.	2%	5%	9%	33%	48%	2%	2%
Independent verification of the head teacher's recommendation on pass/fail by the AB.	1%	4%	11%	32%	48%	4%	1%

*Note that percentages have been rounded so may not sum to 100%. (Percentages\* represent 331 responses included in the quantitative analysis)*

## **Key findings:**

### Formal assessment

The majority of respondents (80%) agreed, or strongly agreed, that two formal assessment points, (one midway through induction and another at the end of the induction period) of ECTs against the Teachers' Standards add value, with many comments recognising formal assessments as valuable milestones to celebrate successes as well as identify areas for development.

Where respondents disagreed, or strongly disagreed, about the value of the formal assessment points, they were asked to comment with a reason and suggestion for improvement. Some commented that reviewing an ECT's progress is valuable but reported that the formal assessment process and administration often creates a workload burden that outweighs the value added. Suggestions to improve workload issues primarily focused on the processes for collecting evidence against the Teachers' Standards and proposed solutions to streamline systems and avoid duplication.

Some respondents noted concerns specifically around the workload of induction tutors in relation to the formal assessment process. They noted that induction tutors often have to rely on information from mentors or evidence provided by the ECTs to conduct formal assessments which can add an additional layer of perceived bureaucracy into the process.

A number of respondents also commented on the frequency and timing of formal assessments. Some respondents wanted to see more frequent formal assessments over the course of induction. Some respondents also suggested that assessments should take place earlier in each year as they feel that the final term is too late in the academic year to conduct a formal assessment.

### Progress reviews

The majority of respondents (85%) agreed, or strongly agreed, that progress reviews (which take place each term where a formal assessment is not held) add value. Half of those who disagreed or strongly disagreed identified themselves as induction tutors. Where these induction tutors left comments about progress reviews, the most common concerns were related to workload.

The workload associated with progress reviews was also reported as a concern more widely, regardless of whether respondents felt that progress reviews add value to induction. Suggestions for improvement were mixed. Some respondents commented that the process was too light touch to add value while others reported that it was too burdensome and similar to a formal assessment. There were some suggestions, across a range of respondents, to change the frequency and level of detail required for progress reviews. These suggestions were wide-ranging and included increasing and decreasing

both the number of progress reviews and the level of detail. A few respondents noted that the termly progress reviews for all working patterns is disproportionate for part-time ECTs and adds unnecessarily to the workload of both part-time teachers and induction tutors.

### Marking the end of induction through a pass/fail based on the ECT's performance against the Teachers' Standards

The majority of respondents (81%) agreed, or strongly agreed, that marking the end of induction through a pass/fail based on performance against the Teachers' Standards adds value, with many commenting on the value it adds to the teaching profession, as well as schools and individual teachers. Some also commented that pass/fail against the Teachers' Standards is important to ensure high-quality teachers that will benefit pupils.

Of those who disagreed, or strongly disagreed (7%), comments noted that pass/fail does not accurately represent the quality of individual ECTs and there were several suggestions for alternative grading systems to recognise the strength of ECTs at the end of induction. A few respondents suggested that, alongside the final decision against the Teachers' Standards, development objectives or targets would support ECTs to take the next step in their career.

### Independent verification of the head teacher's recommendation on pass/fail by the AB

The majority of respondents (80%) agreed or strongly agreed that the verification of the head teacher's final decision by the AB adds value. In the free text comments, some respondents recognised that this independent verification adds rigour to the system and acts as a safeguard for schools and ECTs.

Where the respondents disagreed or strongly disagreed (5%), several noted that head teachers and schools should be trusted to make decisions without any external verification. Some comments suggested that independent verification should only be required in cases of cause for concern or in the event of a fail recommendation by the head teacher.

## **Question 3 Government response**

It is clear from the responses that schools, teachers and ABs value much about the current formal assessment process, the recognition and support it provides ECTs and the safeguards it provides to the school system in ensuring new teachers meet standards. Given the broad agreement to the core principles and current systems around assessment, there are no proposals to develop plans to make significant changes to the formal assessment process. The Department will continue to consider how we might mitigate workload burdens created by the formal assessment process.



## Formal assessment and progress reviews

ECTs will continue to receive two formal assessments: one midway through their induction period and another at the end. In addition, a progress review should take place in each term where a formal assessment is not scheduled. For an ECT working full-time, this means that they would receive a total of four progress reviews (in terms one, two, four and five, based on a school year of three terms). ECTs working on a part-time basis will receive a greater number of total progress reviews as they will serve a greater number of terms between formal assessments. We recognise that this creates additional work for these ECTs and their induction tutors but feel it is reasonable, and prudent, to have an opportunity to check-in on progress at these regular termly intervals. The alternative of requiring a progress review after the equivalent of one term, rather than every term, could mean that an ECT teaches over many school terms without any formal interaction with their induction tutor or feedback on their progress which we think would be unfair to both the ECT and their employer.

To mitigate this burden, and to address other concerns raised about workload burdens created by assessment and progress review processes and administration, it is important that schools and ABs have a clear understanding of the expectations for formal assessments and progress reviews, particularly around the process of gathering evidence against the Teachers' Standards. The wide-ranging free text responses in relation to these questions demonstrated how these processes differ between institutions. This confirmed our understanding that some aspects of formal assessment are being conducted inconsistently across the country. We are committed to creating guidance which is practical and helpful for ABs and the schools they work with. Together with the TSHC and other stakeholders, we will review and test the existing guidance with a view to clarifying expectations for all parties involved in the induction process to achieve greater consistency in assessment practices for ECTs serving induction.

We anticipate that any amended statutory guidance will be published on gov.uk in spring 2023.

Some other free-text comments regarding duplication of workload appeared to show that there is some misunderstanding over who is responsible for conducting, and contributing to, formal assessments. The current statutory guidance on induction<sup>5</sup> is clear that it is the role of the induction tutor to carry out regular progress reviews and undertake formal

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<sup>5</sup> <https://www.gov.uk/government/publications/induction-for-early-career-teachers-england>

assessment meetings with the ECT and not the role of the mentor. We will share further guidance to address this in due course.

### Marking the end of induction through a pass/fail based on the ECT's performance against the Teachers' Standards

It is clear from the responses that marking the end of induction through a pass/fail holds great value and significance to those in the teaching profession. We remain committed to ensuring that formal assessment continues to play a critical role in ensuring that only teachers who successfully meet the Teachers' Standards pass induction and have no plans to make any changes to the way we mark the end of induction. On weighing the options, we do not think it would be helpful to introduce a grading system for ECTs because of the complexity in applying this consistently. But we would encourage schools and ABs to utilise the final assessment report if there are any areas for development that would be helpfully captured to support the continued professional development of ECTs. ABs are reminded of the formal assessment template found in Appendix C of the current guidance for ABs<sup>6</sup> which they can use or adapt.

### Independent verification of the head teacher's recommendation on pass/fail by the AB

While we recognise that some respondents felt that decisions by head teachers do not need to be verified by a third party, the verification of the decision about passing induction not only ensures a level of protection for ECTs but also shields head teachers from the appeals process should an ECT appeal a decision. This step in the process is not about a lack of trust in head teachers but about safeguarding both ECTs and schools. An ECT only has one chance to complete induction so the decision as to whether they complete this successfully is a critical one. In light of this we intend to retain the verification role of ABs.

Amongst the responses to this question, some respondents questioned the value of the AB verification where a TSH acts as both AB and ECF delivery partner. Due to different accountability chains, we do not see an inherent conflict in a TSH acting in both roles. We will share further guidance to address this perceived conflict of interest concern in due course.

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<sup>6</sup> <https://www.gov.uk/government/publications/appropriate-bodies-guidance-induction-and-the-early-career-framework>

## Part 3: Reforming who can operate as an appropriate body

### Question 4

**Would a shift to a predominantly teaching school hub (TSH) AB sector from 1 September 2023 provide a sufficient transitional period for local authorities to wind down their AB service provision and for TSHs to build their capacity to cover need?**

**Summary of responses:** 40% of consultation respondents thought that a shift to a predominantly TSH AB sector from September 2023 would not provide a sufficient transitional period. 25% of respondents thought it did provide sufficient time and 14% thought it might be sufficient time, depending on the ability of TSHs to build their capacity in time in order to cover local need for AB services.

**Table 3: Would a shift to a predominantly TSH AB sector from 1 September 2023 provide a sufficient transitional period for local authorities to wind down their AB service provision and for TSHs to build their capacity to cover need?**

Yes	No	Maybe	Don't know	Not answered
25%	40%	14%	21%	0%

#### Key findings:

A quarter of all respondents (25%) agreed that a shift to a predominantly TSH AB sector from 1 September 2023 would provide a sufficient transition period. The percentage that agreed was significantly higher amongst respondents working for TSHs (65%). This included head teachers, mentors and induction tutors working for TSHs and some TSH ABs.

40% of all respondents answered that a shift to a predominantly TSH AB sector from 1 September would not provide a sufficient transitional period. This percentage was higher amongst ABs overall, with 49% of all AB respondents answering 'No' to question 4.

The most common reasons respondents gave for why September 2023 did not provide sufficient time were that it would disrupt ECTs who started their induction in September 2022 by requiring them to change AB midway through their induction period, and that a longer transitional period was needed to provide TSHs with sufficient time to build their capacity to cover local need for AB services.

Several concerns were raised with regard to ECTs transferring mid-way through their induction period. These included:

- disruption to schools as a result of having to adjust to the quality assurance procedures of a new AB;
- the volume of data transfers between ABs and the GDPR (General Data Protection Regulations) implications of this; and
- the risk to the consistency of support received by ECTs as a result of shifting to a different AB service.

Of those respondents that suggested an alternative length of time to enable a successful transition, the vast majority proposed a transitional period of two years until September 2024 to allow ECTs starting with local authority ABs in September 2022 to complete their 2-year induction with the same AB. Some also suggested that this should be paired with local authority ABs not taking on new ECTs in September 2023 (to avoid those ECTs needing to switch AB after a year).

Amongst the 14% of respondents that answered that September 2023 might provide sufficient time many said this would be dependent on the ability of TSHs to upscale in order to meet local demand for AB services.

Induction tutors, head teachers, ECTs and mentors make up the bulk of the 21% of respondents that answered, 'don't know' to this question.

## Question 5

**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?**

**Summary of responses:** While some respondents noted that this reform would not create any challenges for their organisation, other respondents raised a number of different challenges and barriers that could be caused by this reform. The primary concerns were around loss of expertise and school relationships as a result of local authorities leaving the AB role and the potential impact of that on the quality of AB services. Challenges around scaling up sufficient TSH capacity were also a concern for some respondents.

### **Key findings:**

A number of barriers and challenges were reported by respondents of all types including local authorities, TSHs and schools. One of the most commonly reported challenges was around the loss of relationships and expertise currently being provided by local authority ABs. Schools and local authorities were more likely to report this concern and commented that they valued the well established and effective relationships that often exist between schools and local authorities. They noted the experience and detailed

knowledge of school contexts that might be lost from the AB role when this reform takes effect.

In addition, some of the issues raised in question 4 were also reported in question 5 as challenges and barriers, such as concerns that TSHs ABs may not have the capacity, resource or expertise to provide the same level of quality AB service as their local authority, as well as the challenges associated with transferring to a new AB midway through induction. Other barriers and challenges raised in the responses included:

- challenges related to the proposed timeframe and pace of change;
- challenges for local authorities related to data retention once they cease to operate as an AB;
- challenges for local authorities in managing expected redundancies or redeployments, including associated costs;
- increased school workload as a result of any new processes if they change AB;
- increased costs for schools if their TSH charges a higher cost for AB services than their local authority;
- concerns around the removal of choice of AB, including for multi academy trusts that work across more than one TSH area; and
- concerns about the length of the TSH designations and the impact it might have on capacity and stability if TSHs have to cease operating as ABs at the end of their TSH designation.

Some TSH respondents also commented on the induction regulations that prevent them acting as the AB for any ECTs they assessed for the purpose of award of QTS (Qualified Teacher Status) as an accredited ITT (Initial Teacher Training) provider. This was reported as a barrier to TSHs providing AB services to their local area where they are also an accredited ITT provider. Other respondents representing international schools also used the comments section of Questions 5 and 6 to request that a wider range of international schools beyond those with British schools overseas accreditation should be able to offer induction.

A small number of respondents reported that the reform would not create any barriers or challenges, and some used this question to recognise that creating an AB system of predominantly TSHs would help to create a more efficient and streamlined system for schools. In addition, some respondents reported that they already use a TSH's AB provision so this reform will not result in any change for their organisation. While not within the scope of the consultation, a number of respondents used the free text in questions 4 and 5 to indicate that they were not in favour of local authorities leaving the AB market.

## Questions 4 & 5 Government response

### Rationale for reforming who can operate as an appropriate body

Although the purpose of questions 4 and 5 of the consultation was to identify how to achieve a successful transition to the reform, a number of respondents used these questions more broadly (and the option to provide additional comments under Question 6) to state their opposition to the proposed reform to transfer the AB role from local authorities to TSHs. The Department understands that some local authorities, and the schools that they serve, have not welcomed the news of reforming who can operate as an AB and the transfer of the role from local authorities to TSHs. We want to be clear that the reform is not a reflection on the quality of all local authority services. We know that many local authorities have significant experience and expertise as ABs and show great commitment to their ECTs and schools. The responses to this consultation provide further evidence that variation in quality and approach is currently an issue across ABs so the key rationale for the reforms remains linked to finding a cost effective way to introduce greater quality assurance.

For local authorities, there are no direct accountability mechanisms to ensure quality across local authority AB services. This creates a barrier to addressing the long standing issues around inconsistency in AB services. The Department already has a formal agreement in place with each TSH and we hold them to account against key performance indicators. This relationship with TSHs provides an existing mechanism through which to introduce more robust quality assurance without the need to set up a costly and duplicative quality assurance or accreditation system. As part of this reform, we are working closely with the TSHC to consider how we can strengthen this mechanism to ensure more consistent quality across all AB services.

Several respondents asked for further clarification of the aims of the reforms. Alongside the core aims of quality assurance, the reforms aim to bring about the benefits of a smaller number of ABs by reducing negative impacts of competition on price and level of service created through school choice within some local areas. As stated in the consultation document, the AB reforms are also intended to support the wider changes to the role of local authorities away from education services outlined in the '*Opportunity for all: strong schools with great teachers for your child*' white paper.

We understand that this reform will have a significant impact on the way that many organisations operate and are committed to supporting the transition. We will share guidance in due course that addresses the detail of the reported barriers and challenges and will continue to work closely with TSHC and other stakeholders who will support ABs and the schools they work with through this transition.

### Transition timeline

It is clear from many responses, which have the best interests of ECTs as their basis, that the date of September 2023 proposed in the consultation would not allow sufficient time for ABs and the schools they work with to plan a well managed transition and provide a consistent, quality experience for all ECTs.

We are committed to ensuring that there is a sufficient transitional period for local authorities to wind down their AB service provision and for TSHs to build their capacity to cover need. We will introduce a phased transitional period for this reform where local authorities will be able to continue acting as ABs until September 2024 but in the interest of consistency for ECTs local authority ABs will not be able to register any new ECTs from September 2023. This will mean that local authority ABs will be able to continue acting as AB for the majority of their 2022/23 cohorts, while also ensuring consistency for future cohorts.

While this extended transitional period means that the majority of the ECT cohort starting in academic year 2022/23 will be able to complete their induction with their original AB, there will be a minority of ECTs serving 'non standard' inductions (either part time ECTs, ECTs who started induction during academic year 2022/23 after September 2023, or ECTs who require an extension at the end of their induction period) who will need to transfer to a new AB from September 2024. While these ECTs may see some disruption to their induction, the extended timeline will provide local authorities and TSHs additional time to collaborate on ensuring that disruption is minimised and that relevant records are transferred.

An extended transitional period will also allow local authorities additional lead time to wind down their services and respond to the challenges and barriers they raised in their consultation responses, around staff contracts, and planning for data transfer and retention.

Similarly, the extended transitional period will provide TSHs with additional time to scale up their services to meet their local demand and have further time to collaborate with their local authorities and neighbouring TSHs to ensure a well managed transition. We will ask each TSH to work with local authorities and other local partners to put in place a local transition plan in early 2023, to support a collaborative approach and assure DfE there will be sufficient capacity in place.

This transitional period will require amendments to regulations which we expect to be published in spring 2023, and to come into force from September 2023.

### TSH capacity

We recognise that there will be challenges for some TSHs to scale up their AB provision to meet the need in their local area once local authorities are no longer operating as ABs and that this is a concern for both schools and TSHs themselves. Throughout the transitional period we will work together with the TSHC and experienced ABs to ensure that TSHs are provided with a programme of training and peer support that will help build their capacity and expertise as ABs. An extended transitional period will ensure that TSHs have the time and resources to build their capacity and expertise nationally, to support a smooth transition.

We also note the concerns regarding the TSH designation period. TSH designations have been agreed for three years i.e. up to August 2024 and a process of designation will take place in advance of that. Details of the designation process have not yet been announced and will be communicated in due course. The timing of the reforms to who can operate as an AB is not contingent on TSH designation timelines.

### Conflicts of interest

We recognise the barrier related to conflicts of interest which means that some TSHs are unable to register some ECTs to their AB service. We will review the conflict of interest restrictions and test any potential changes to regulations with ABs and other stakeholders in due course. We are committed to providing schools with at least one term's notice in advance of any regulatory changes coming into force and would ensure appropriate lead times required to allow ABs and schools to make alternative arrangements for any potential changes to conflict of interest restrictions to minimise disruption to existing arrangements.

### Clarifications

Amongst the responses for these questions, there were also some misconceptions about TSHs and issues that we would like to provide detailed clarifications on. Many of these points related to conflicts of interest or different scenarios where a school can or cannot use a TSH's AB provision. We are clear that TSHs can act as AB for all schools eligible to offer statutory induction and this includes fee paying independent schools as well as state funded schools who are delivering their own ECF-based training programme. We will share further guidance to address these points of clarification in due course.

With regard to the requests for statutory induction to be served in a wider range of international schools, current regulations only permit induction to be served within independent schools overseas which meet specific criteria and there are no current plans to review these criteria. As stated in the consultation document, however, we will be



looking to determine a specialist AB who will be able to work with British schools overseas (BSOs) who offer statutory induction so that these schools have access to an AB with the capacity and expertise to support them through the induction process. We will publish further information about this in the coming months.

## Next steps

Following the publication of this consultation, the Department will look to introduce updates to regulations to bring into effect the two stage transition for local authorities, reducing, then ending their AB role by September 2024. Alongside this it will look to update statutory guidance on induction and advice for ABs and schools on the points set out within this response regarding expectations around entitlement checking, escalation of concerns and proportionate approaches to assessment. The following timeline summarises the anticipated next steps in introducing these reforms, subject to parliamentary approval:

- From November 2022: further DfE clarification and guidance for ABs via regular newsletter communication
- Academic year 2022/23: TSHC support programme for TSHs to build capacity and expertise
- Spring 2023: TSH create local transition plans in partnership with local authorities and neighbouring TSHs
- Spring 2023: revised regulations published (subject to Parliamentary approval) with updated statutory guidance
- September 2023: revised regulations come into effect (subject to Parliamentary approval) meaning that local authorities can no longer claim new ECTs
- September 2024: formal handover of all AB services to TSHs, local authorities ceasing to operate AB services.

## Annex A: Who responded

Of the 332 total respondents, the breakdown by organisation type and role:

Type of organisation	Number of respondents
Local authority*	87
Teaching school hub*	54
National appropriate body	2
Maintained school	54
Academy	96
Independent school	8
British School Overseas	5
ECF lead provider	2
Other	24
Total	332

\*Note that not all of those that identified themselves as local authorities or TSHs were appropriate bodies, e.g. some were responding in the capacity of school leaders or other roles.

Role within organisation	Number of respondents
Appropriate body	85
Head teacher	57
School/trust leader	27
Induction tutor	90
Mentor	11
Early career teacher (ECT)	13
Teacher (non ECT)	4

ECF-based training provider	10
School governor	1
Other	34
Total	332

## **Annex B: Response totals per question**

**Question 1 - What barriers do ABs face in ensuring that ECTs are provided with their statutory entitlements and how could these be overcome?**

There were 304 responses to this question.

**Question 2 - Based on your overall experience, to what extent do you agree that ABs are carrying out the following responsibilities of their role effectively?**

<b>Sub question</b>	<b>Strongly disagree</b>	<b>Disagree</b>	<b>Neither agree nor disagree</b>	<b>Agree</b>	<b>Strongly agree</b>	<b>Don't know</b>	<b>Not answered</b>
Ensuring that ECTs receive their statutory entitlements (time off timetable, regular mentoring, etc).	3	17	31	106	160	9	5
Ensuring that mentors and induction tutors have sufficient time and ability to undertake their roles effectively.	10	34	49	130	96	7	5
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.	4	9	31	83	172	28	4
Agreeing extensions or reductions to the length of the induction period for ECTs in line with statutory guidance.	4	2	34	63	176	47	5
Ensuring that where an ECT may be experiencing difficulties, action is taken to address areas of performance that require further development and support.	5	11	34	67	172	38	4
Ensuring that where an institution is not fulfilling its responsibilities, contact is made with the institution to raise any concerns.	3	10	37	65	147	64	5
Ensuring that the monitoring, support, and assessment against the Teachers' Standards and guidance procedures in place are fair and appropriate.	3	8	27	95	178	16	4
Ensuring that ECTs have accurate induction records.	6	13	24	93	169	21	5
Ensuring that a fair and appropriate decision is made with regard to the head teacher's recommendation on whether ECTs have satisfactorily performed against the Teachers' Standards (pass/fail) at the end of the induction period.	5	5	28	80	184	25	4

There were 95 free text responses as part of this question.

**Question 3 - 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?**

<b>Sub question</b>	<b>Strongly disagree</b>	<b>Disagree</b>	<b>Neither agree nor disagree</b>	<b>Agree</b>	<b>Strongly agree</b>	<b>Don't know</b>	<b>Not answered</b>
Two formal assessment points, one midway through induction and another at the end of the induction period.	5	23	32	115	149	3	4
Progress reviews, one in each term where a formal assessment is not held.	3	16	24	134	148	2	4
Marking the end of induction through a pass/fail based on the ECT's performance against the Teachers' Standards.	5	15	31	110	159	6	5
Independent verification of the head teacher's recommendation on pass/fail by the AB.	3	12	35	105	160	12	4

There were 102 free text responses as part of this question.

**Question 4 - Would a shift to a predominantly TSH AB sector from 1 September 2023 provide a sufficient transitional period for local authorities to wind down their AB service provision and for TSHs to build their capacity to cover need?**

Yes	No	Maybe	Don't know	Not answered
84	131	47	68	1

There were 186 free text responses as part of this question.

**Question 5 - 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?**

There were 285 responses to this question.

**Question 6 - Do you have any other comments on the role of the ABs or statutory teacher induction?**

There were 224 responses to this question.



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