

NASUWT

N A S U W T R E S P O N S E

DfES - EVERY CHILD MATTERS

1. NASUWT welcomes the opportunity to comment on the Government's proposals for reform to the organisation and delivery of children's services. The Association is grateful for the short extension to the timescale for receipt of its response.
2. In submitting this response, the Association takes the opportunity to present its view in full, beyond the restrictions imposed by the use of the consultation questionnaire format.
3. NASUWT represents the interests of over 212,000 teachers in schools and colleges throughout the United Kingdom.

GENERAL COMMENTS

4. NASUWT welcomes the Government's commitment to a strategy which sets out to protect those children at risk of harm and neglect, whilst ensuring better services for all children.
5. The Government is right to identify the adverse impact of poverty and low income on the progress, achievements and life chances of children and young people. The link to anti-social behaviour is also well established. Indeed, these social characteristics have remained largely unchanged over time, and are also inter-generational.
6. The proposals contained in the Green Paper will not, by themselves, overcome the fundamental effects of poverty and deprivation on the life chances of many children and young people. This is not to argue against many of the worthwhile developments advocated by the Government, including the National Childcare Strategy, the expansion of Sure Start and the development of universal parenting services. However, what is also needed is an overhaul of the tax and benefits system and specific measures to tackle economic inequality and to regenerate schools and the neighbourhoods they serve. Indeed, a neighbourhood regeneration plan must take account of the implications for/of schools and the impact on children's learning, health and welfare. The Government should consider how such criteria can be incorporated more effectively into future programmes.
7. Parental responsibility is also a critical factor in ameliorating life chances. Again, this links to poverty, economic inequality and domestic incomes. Central to this is the need to extend to working parents greater opportunity to fulfil their family responsibilities. Improvements to flexible working arrangements and progress in respect of work/life balance would be particularly important. The answer does not lie in extending the opening hours of schools or in requiring teachers and education

staff to work longer hours. Instead, the Government must link its Green Paper strategy to the wider economic and employment strategy which recognises the importance of good parenting.

8. Schools report that there are too many parents who are unable or unwilling to support their children's education in ways which would make a difference to their child's learning. Often, the cause is the difficulty that parents have in terms of securing time out of the workplace in a manner which does not lead to them being penalised financially. This is an issue for parents whatever their socio-economic background. The answer does not lie, as the Government has suggested, in punishing the minority of so-called 'bad' parents by means of penalty notices, but requires finding better ways to support the everyday work of all parents.
9. Whilst identifying the link between poverty and problem behaviours, low educational attainment, poor health and other negative factors, it would be wrong to conclude that such negative effects are irresistible.
10. Families, local communities and the society at large have a vital role to play in the raising of future generations. The norms and values of the society must be considered as part of any long-term strategy for social improvement, economic prosperity and civic participation. The Government's strategy must serve to enhance the role of parents and the wider community in the raising of children and young people. It would be wholly unfortunate if parents were encouraged to abnegate their responsibilities as a result of measures to "institutionalise" parenting, such as the provision of extended schools. Schools must play an important part, but not at the expense of building better relationships between parents and children.
11. The Government acknowledges in the Green Paper that schools are often the last remaining neighbourhood facility in many communities. As such, the school has been identified as a focal point for numerous Government-inspired programmes to deliver wider social and economic improvement. However, such developments have not necessarily enhanced or benefited education, particularly where teachers and education staff have been invited to undertake, over the years, an increasing range of non-teaching roles.
12. NASUWT accepts fully that many school buildings have a potential which is not currently being realised. It is important for Government to ask whether and how such facilities can be better utilised, albeit with the proviso that such other services or functions do not undermine the school's core educational purpose, or remove the autonomy of the school in educational matters. For NASUWT, this is a central challenge presented by the Green Paper, and one which requires further development and debate between Government, the profession and the public.
13. At the same time, the Government will need to address itself to the deteriorating condition of many school buildings. Even taking account of their relatively narrow educational purpose, too many school buildings are not fit for purpose. The Government will not be able to deliver the reforms it seeks without a radical improvement to the schools building and refurbishment programme.

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14. The Association would be seriously concerned if the Government sought to deliver such investment through the medium of PFI. Evidence demonstrates that PFI has been costly and damaging to the delivery and development of public services wherever such schemes have been established. Moreover, it is wholly unlikely that the Government would be able to deliver the complex service arrangements suggested in this Green Paper where the funding and organisational control of school buildings is removed from the public sector.
 15. In recognising the centrality of the school as a focal point in many neighbourhoods, the Government should also consider the implications of its policy on specialist schools and Academies. These schools serve an entirely different constituency from their counterpart non-specialist maintained schools, and the differences between such schools are set to become more distinct. Schools which admit pupils on the basis of aptitude and ability are less likely to be regarded as neighbourhood facilities for the benefit of the local community. NASUWT believes that the Government's policy on specialist schools is at odds with the agenda set out in the Green Paper, which emphasises the provision of services for the benefit of the child, their family and local area. There is a need either to abandon one or other of these policies or for the Government to explain fully how these policy strands will be synthesised.
 16. The Government is right to seek to address the problems of the fragmented provision of children's services, funding, the multiplicity of agencies involved in the assessment of children's needs, and the range of bodies working to ensure the safety and protection of vulnerable children. The current arrangements have resulted in costly duplication, without, as Lord Laming has concluded, assuring effective safeguards for children at risk.
 17. However, the Government must recognise that a move towards greater integration of frontline children's services will carry significant financial implications and will not by itself lead to a reduction in service costs. Evidence obtained from multi-agency collaborations and partnerships that have been piloted and/or established across the country are testament to the cost-intensive nature of reorganising service provisions in this way. The proposal for the establishment of a Director of Children's Services may offer a way forward in terms of service co-ordination on the ground, but the purpose of this new function requires more specific explication and examination. Indeed, there is a risk of exacerbating the postcode lottery associated with the provision of education and social care services resulting from a failure to understand the needs of specific services. NASUWT suggests that within the context of locally democratic service provisions, there is a benefit to be derived from the establishment of a children's services plan to which education, social services, health and other departments should be required to contribute. However, this does not require or justify the artificial amalgamation of distinct service provisions/functions at the local authority level.
 18. NASUWT strongly recommends that further detailed consultation is required on proposals for a Director of Children's Services post to be established in every LEA.
 19. In light of the recent furore over school budgets and funding for local government in general, NASUWT does not believe that the Government is intent on another funding crisis in schools or that it is prepared to accept further steep rises in the
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levels of Council Tax bills. Parents and teachers could not accept cuts in the provision of teaching and other education services (e.g. special educational needs support, school transport) which, if not anticipated, would be a likely result of the restructuring provisions contained within the Green Paper. NASUWT cannot endorse the Green Paper without an examination of the attendant funding implications critical to the proposals.

20. In 2003, the Government, employers and trade unions signed an historic agreement to achieve major reforms of the school workforce. The National Agreement is founded on the clear principle that the role of the teacher is to teach. The Agreement has identified a staged strategy to bring about reforms to the school workforce, which will include freeing teachers to undertake teaching, planning, preparation and assessment for learning; the deployment of support staff in schools to undertake a range of administrative and clerical activities previously undertaken by teachers; and the appointment and training of support staff to undertake such tasks as cover for absent teachers and to support teaching by working with groups of children under the direction of a qualified teacher. These reforms are critical to providing a platform for raising educational standards and the delivery of programmes of teaching and learning more tailored to the needs of individual children.
21. As a signatory to the National Agreement, the Government has rightly recognised that teachers should teach and that other staff should be deployed to meet other needs of pupils, whilst also supporting teachers in their work.
22. A key component of the Green Paper is the apparent suggestion that teachers and other education staff should acquire a critical role in relation to child protection matters. NASUWT believes that the authors of the Green Paper have not fully understood the teacher's role or taken account of the implications of the school workforce reform agenda. In the Association's view, teachers, including headteachers, must not be diverted into assuming roles or functions within the school not related to teaching and learning, no matter how worthy these roles or functions may be. It is, of course, right that education staff should contribute to the realisation of the Government's agenda for child protection, welfare and support. However, this in principle acceptance should not obviate the need for Government to invest fully in augmenting the range of professional service provisions available to children and their families, regardless of where such provisions are located.

CHAPTER SPECIFIC COMMENTS

Chapter 2: Strong Foundations

Special educational needs

23. A key attribute of the Green Paper is the promotion of educational inclusion. The process of assessing and making provision for pupils with SEN has been variable in different schools and in different LEA areas. Improvements are required, and there is also a need for additional funding at the level of the LEA to provide for a timely and effective statementing process.

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24. The training, recruitment and retention of specialist staff, including Educational Psychologists, must be addressed by the Government. It is deeply unfortunate that the Green Paper is silent on this particular issue. The Government must act with urgency to address this issue if its inclusion aim is to be realised.
25. The Association is wholly opposed to any attempt to reduce the number of SEN statements. There is evidence across the country that the number of statements issued since the current SEN Code of Practice has been significantly reduced, largely as a result of inadequate funding and support available within LEAs. Whilst it is important 'to ensure that parents have the confidence that their children's needs will be met quickly and effectively throughout their education without feeling that the only way to achieve this is through a statement', it is equally important that children are not denied access to a statement and the resources and support they need to gain full access to learning opportunities.

Education Maintenance Allowance

26. The Association supports the extension of the Education Maintenance Allowance (EMA) to all 16-19 year olds from low income backgrounds. However, despite the introduction of the EMA, it is still the case that many young people from low income families are at an increased risk of dropping out of education. They may also be diverted from effective study as a result of needing to boost their own or their family's income by undertaking paid employment whilst studying, despite the negative impact of doing so on their progress and overall attainment. The Government must consider what further steps are necessary to increase effective educational participation amongst this age group, including further reforms to the tax and benefits system.

Integrating services through extended schools and clusters of schools

27. The Association has indicated elsewhere in this response that extending the way in which school buildings are used could represent a helpful development. However, it is crucial that the school's educational function is not compromised as a result of any such developments.
28. Evidence from the extended schools pathfinders is not yet fully available. It is essential that in promoting the extended schools model, the Government is able to demonstrate the positive impact of integrating services in this way. In particular, extended school provisions must, at a minimum, deliver real and tangible improvements in educational participation and the standards achieved. The Government must scrutinise carefully the findings and conclusions arising from the pathfinder evaluation.
29. Feedback obtained by NASUWT indicates that the extended schools pathfinders have delivered, at best, a questionable range of outputs. Indeed, it is right to make clear that the outcomes from the extended schools initiatives are yet to be identified. Nevertheless, whilst the provision of breakfast clubs, parenting classes, health care services and a range of other activities has, in many cases, been popular, the impact of these initiatives on children's educational progress and attainment is not clear. Neither can the benefits be assumed.
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30. Of particular concern to NASUWT is that in many of the schools involved, activities beyond the school's core educational function may have begun to overshadow the school's core function. For many of the advocates of the extended schools movement who attended the prestigious DfES Extended Schools Conference in London on 22 October 2003, headteachers appeared to feel that they needed to migrate from being leaders of pedagogy (teaching and learning) to become general managers of mixed services (i.e. equally knowledgeable about health matters, social care provisions and attendant legislation and regulations). Some pathfinder schools confidently reported that they had delegated leadership of teaching and learning to their deputy headteachers!
31. This highlights the potential dangers of the extended schools strategy. The Association maintains that headteachers must remain focused on teaching and learning in schools as their primary concern. This is consistent with the provisions in the National Agreement on school workforce reform.
32. NASUWT is concerned that the concept of leadership in extended schools has not been adequately considered in the Green Paper. NASUWT has headteachers and members of school leadership teams in membership. However, the Association is far from convinced that the person with overall responsibility for the activity of an extended school should be the headteacher. There is no justification for headteachers to become de facto chief executives. Headteachers, paid in accordance with the provisions of the School Teachers' Pay and Conditions Document, must work in accordance with the provisions of the Document and should not be diverted into other roles or functions within schools.
33. At the same time, the Association also warns that the Government's extended schools strategy is in danger of collapsing into a residual strategy, of benefit to those who live in particularly disadvantaged neighbourhoods. The evidence from the pathfinder schools suggests that extended schools have served to patch up a failing selective, segregated and atomised education system and that this development has acted as a palliative to schools in challenging circumstances. A critical question remains as to whether all schools would choose to become extended schools, and, in particular, whether the model of the full service extended school is one that would appeal to more advantaged schools serving relatively affluent communities. The Government would be unwise to invest heavily in such provisions where they are unable to appeal to all types of school and where the educational benefits of such provisions cannot be demonstrated to parents.
34. The establishment of extended schools is, potentially, a very costly undertaking. The Government must make clear how it intends to fund this strategy, without detriment to core educational functions.

Supporting children entering the country

35. The Association welcomes the Government's intention to develop measures to improve support for unaccompanied asylum-seeking children. These children are particularly vulnerable. However, the Government's aspirations in this area must also be reflected in a consistency of treatment of asylum-seeker children in general.

The Government has announced that it intends to introduce further legislation in respect of immigration and asylum, which will include provisions for taking into care the children of 'failed' asylum-seekers. Such a policy would be acutely at odds with the provisions of this Green Paper and result in the adverse break-up of families. The Association urges a reconsideration of the proposals to be contained within the Asylum and Immigration Bill.

Chapter 3: Supporting Parents and Carers

36. Inspection and research evidence has highlighted the significant and positive impact of parental involvement and support for education on children's progress and attainment. All parents may benefit from encouragement to play an active part in their children's learning. Working parents, in particular, often require greater opportunities in order that they can support the work of their child's school. All too often, such parental involvement is sacrificed because parents are unwilling or unable to visit their child's school to discuss issues when they are at work.
37. Extended schools provide an approach to resolving this problem. In such schools, additional education-related support staff could be deployed to provide further opportunities for parents to discuss their child's work, progress, attendance and behaviour. Such staff, provided they are appropriately trained, might also be able to discuss issues relating to the child's physical and emotional development.

Universal parenting services

38. NASUWT supports the provision of freely accessible universal parenting support services. The measures included in the Green Paper should afford benefits to all parents and contribute in some ways to more effective educational engagement and progress by children and young people.
39. Meetings of parents at key transition points are important. Relevant bodies should be encouraged to meet with parents to discuss education, health and other matters as appropriate to the needs of the child and at the relevant time. Whilst it would be wholly inappropriate for the Government to impose upon teachers additional requirements to meet with parents, the school workforce remodelling agenda does provide opportunities to engage parents in a more extensive dialogue with their child's school on educational and a range of related matters. The Government has rightly identified the recruitment of additional support staff in schools. This is welcomed. Indeed, extending the range of appropriately trained professional staff in schools would help to ensure that parents receive the feedback they need, in a timely fashion and on a range of issues beyond those which teachers are able to address.
40. The Association shares the Government's view of the value of extending the provision of family learning programmes as a means of bridging the gap between home and school. However, to make progress in this area, the Government must identify how it intends to fund the provision of additional staff to roles which are not directly connected to the provision of teaching for pupils in schools. It is essential that such provision does not add to the pressures on school budgets.

Specialist parenting support

41. The Association supports the Government's intention to provide targeted help to specific groups. Given the existing trends in relation to the relative educational "underachievement" and high exclusion of pupils from certain black and minority ethnic groups, gypsy-traveller children and children in care, it is deeply unfortunate that the Green Paper fails to provide specific targeted measures for the benefit of children from these constituencies.

Chapter 4: Early Intervention and Effective Protection

42. Undoubtedly, it is true that the number of agencies involved with an individual child can result in situations where no single agency takes responsibility. This is hardly surprising. Fragmentation has been caused by such policies as privatisation, contracting-out of services, local financial management, deregulation of pay and conditions, performance tables and best value. These policies have undermined institutional cooperation, collaboration and information and impacted adversely on the ability of schools, social services and the health sector to recruit and retain necessary staff. The Green Paper fails to address these more fundamental issues which may otherwise undermine the Government's important reform programme.

Improving information collection and sharing

43. The Green Paper rightly emphasises the importance of information sharing between the various agencies involved in working with children. Even where this takes place, it is important that agencies are equipped and committed to make use of the data they have at their disposal, if tragedies like the death of Victoria Climbié are to be avoided in future.

44. NASUWT supports the long-term vision 'that information is stored and accessed electronically by a range of agencies' and that such information is developed using a common approach. Local authorities have a key role to play in ensuring the establishment of effective information hubs, which conform to appropriately determined standards in respect of scope of data included, economy/efficiency, equality, effectiveness, timeliness, manageability, accuracy, confidentiality and security.

45. NASUWT looks with interest to the dissemination of the early lessons from the Identification, Referral and Tracking trailblazers to be reported in 2003/04. It is imperative that the Government takes full account of the implications arising from this work prior to initiating further work in this area. The Government's allocation of £100,000 to each unitary and county council is unlikely to improve information sharing between agencies dramatically. A detailed ICT investment strategy over the short- medium- and long-term is needed alongside the service provision proposals contained within the Green Paper.

46. A unique identifier for each child does appear to be an essential pre-requisite for any effective tracking system. The Government is yet to report and consult properly on this issue. There are various identifiers in existence, each of which has limitations.

Moreover, it is not clear how the Government will be able to resolve the implications of highly mobile and transient communities, including asylum-seekers, missing children and other particularly vulnerable groups.

47. The Government has signalled its intention to remove the legal barriers to data transfer between different agencies. There are very real issues involved, here, which will benefit from detailed scrutiny by the Data Protection Registrar and consultation with representatives of the various professional groups involved.
48. The Government must consult further on the question of thresholds and triggers for sharing information about a child. There is a danger that information systems could become clogged with irrelevant data. The Association believes that the Government should come forward with clear proposals on this matter.
49. There is also the issue of how the agencies involved in any information hub might be expected to act upon the information. There is a danger of large numbers of records containing red flags which could trigger interventions even where they are unreasonable and/or unnecessary.
50. The implications arising from the use of data by the agencies involved must also be clarified. Clear protocols regarding the use of data would need to be established in consultation with the relevant professional bodies. Additionally, each professional group would need to be fully trained on the purpose of the information held and their responsibilities in respect of such data.

Common assessment framework

51. The Association welcomes the principle of establishing a common assessment framework. However, further consultation is needed on precisely how this would operate, and on the safeguards needed.
52. Moreover, it is essential that the Government builds on the principles established in the National Agreement on school workforce reform. In particular, teachers should be employed to teach; other staff in schools should be deployed in a variety of administrative, clerical and other support roles to better meet the needs of the individual child or group whilst also enabling teachers to focus on their primary role.
53. The Green Paper identifies that 'pastoral staff in schools, who may already have trusting relationships with the child or parent, may be in a better position to discuss initial concerns with a child or parent, and work with them over time, than a social worker with whom the family has had no previous contact'. Nevertheless, the Association believes that the implication of remodelling is that there can be no automatic assumption that teachers should take on this responsibility or that it is an appropriate appointment under the School Teachers' Pay and Conditions Document. Schools should recruit appropriately trained professionals for this purpose. Parents will need to be informed as to the development of such roles in schools so that they can develop confidence in them. However, increasing the number of support staff employed in schools would dramatically help schools to deliver the Government's reform agenda for early intervention and effective protection.

Lead professional

54. The proposed lead professional role must be the focus of further development and consultation. NASUWT supports the idea in principle, but the Green Paper provides too scant an assessment of the issues and implications involved. At the same time, the Government will need to clarify the position regarding the role of the 'designated teacher' which, the Association suggests, should be distinct from that of the lead professional.
55. It is imperative that the implications of the National Agreement on school workforce reform are addressed in the development of the lead professional proposals. In particular, the role of the classroom teacher, as envisaged by the school workforce reforms, is not compatible with the role envisaged for the lead professional. The Government is right to identify that such a role would be undertaken by other school based staff.
56. NASUWT suggests that the Government examines the contribution which the range of professionals outside schools could make if they were to be deployed within schools. The Connexions personal advisors would provide one opportunity to establish efficiently the lead professional concept in a way which might benefit children, their schools and other agencies more effectively than at present.

Multi-disciplinary teams

57. The Association believes that further and more detailed consultation is required on the establishment of multi-disciplinary teams and the relationship these would have with specialist and/or mainstream services. Previous experience of multi-disciplinary arrangements has, in general, not been successful, especially where the conflicts between the various professional group interests have not been resolved and where funding arrangements have not been consistent with multi-disciplinary practice.
58. The Government envisages that, 'over time, professionals and non-professionals might increasingly work together in different types of teams'. The Green Paper specifically cites learning mentors and school support staff as two of the groups that might be represented in such teams. This raises vital questions about who would manage the school support staff who are so deployed; how such staff would be deployed on a day-to-day basis; and the terms and conditions that would apply to these staff. At the same time, NASUWT is concerned that the new roles identified for school support staff as a result of the National Agreement – i.e. to support teaching and learning – should not be displaced by other 'competing' roles/functions. If the Government is planning the significant expansion in the number of such staff to take account of additional demands, this should be included as part of the ongoing consultation on the multi-disciplinary team proposals. This issue would benefit from a detailed consideration within the school Workforce Agreement Monitoring Group.

Co-location around schools, Sure Start Children's Services and primary care

59. The issue of co-location raises important implications for the schools' capital building programme.

60. At the same time, it is important for the Government, schools and the public to distinguish clearly between the school as a site in a neighbourhood where a range of activities might occur and the school as a place of teaching and learning. A conceptual break is needed to avoid the danger of blurring the lines around service delivery, staff deployment and accountability.

Chapter 5: Accountability and Integration – Locally, Regionally and Nationally

61. NASUWT believes the current arrangement of LEAs to be too small to be effective. The existence of many small unitary authorities has undermined effectiveness of strategic planning, coordination and service delivery whilst also leading to increased costs of provision. These constraints will hamper the delivery of the Government's aspirations for children's services provision. NASUWT believes that the present LEAs should be replaced by a smaller number of sub-regional, democratically accountable LEAs.

62. Section 175 of the Education Act 2002 requires LEAs to make arrangements for ensuring that the functions conferred on them in their capacity as an LEA are exercised with a view to *safeguarding and promoting* the welfare of children. The Minister for Children, Margaret Hodge, has made no decision on the implementation of this clause. It is essential that in the context of the debate on accountability of children's services that the Government clarifies how the Green Paper and the legislation fit together.

Director of children's services

63. The Green Paper fails to clarify adequately the role of the Director of Children's Services envisaged for all local authorities. Neither has the Government demonstrated the merits of establishing these posts. NASUWT believes that the creation of such a post could seriously damage children's services provision. The Government does not appear to have acknowledged in its proposals the complex functions of local authority social services departments, which are provided to all age groups. Neither do LEAs serve only the needs of children. Nevertheless, bringing together such large local authority services, without a detailed consideration of the implications, process and possible consequences arising from this strategy, is likely to be expensive and counter-productive.

64. NASUWT strongly recommends that before progressing this proposal, the Government must consult further on the full range of issues involved and the process and timescale for establishing such arrangements.

Children's Trusts

65. The Association recognises the Government's desire for a long-term transformation in respect of the provision of children's services. This will require greater integration across the range of different agencies involved together with better cross-disciplinary working. However, the Government's aim to establish Children's Trusts in every local authority area requires detailed scrutiny on the basis of empirical evidence as to the impact of such reorganisation on the quality of services provided for children, recruitment and retention of staff, and the costs of implementing change of this

nature. The Association believes that the Government's target for the establishment of Children's Trusts is overly ambitious and potentially damaging. The Government is in danger of unnecessarily putting at risk existing standards of children's services provision. Moreover, the timescale for achieving this transformation in service delivery will undermine the very democratic and inclusive principles on which much of the Green Paper is founded.

66. Neither has the Government explained satisfactorily its rationale for excluding certain services from the remit of the Children's Trusts. In particular, the Government must reconsider the logic of excluding the Learning and Skills Councils – despite their engagement in the funding and inspection of some children's services provisions - whilst seeking to ensure that LEAs will be included.

Local safeguarding children boards

67. NASUWT welcomes the replacement of the Area Child Protection Committees (ACPC) with Local Safeguarding Children Boards which local authorities have a duty to set up. Some ACPCs have not been as effective as they should have been because of a lack of resources and status. NASUWT asserts that education representatives must be given equal status on the new Boards and that account is taken of the time constraints arising from involvement.

Inspection

68. The inspection frameworks will need to be amended to ensure that they better contribute to supporting service improvement whilst removing the often attendant problems of excessive workload and bureaucracy. Any new inspection framework(s) must recognise and take account of the agenda for reform of the school workforce in particular and the Government's proposals for a coherent and integrated children's services workforce.
69. The Green Paper advocates an integrated inspection framework as 'a powerful force to secure genuine integration' of children's services. The Government rightly proposes that the burdens of inspection should be minimised, whilst wanting to secure sufficiently rigorous inspection of what will become highly complex service arrangements. The Association does not believe that the Government's objectives are compatible. NASUWT recommends that detailed rationalisation of the inspection system should take place, although the Association is not convinced that the responsibility for reviewing the current inspection arrangements should rest with the inspectorate itself.
70. The Government and the inspectorate are likely to face a serious problem in respect of the recruitment of inspectors with the requisite skills and expertise. NASUWT believes that these problems will intensify if the inspectorates continue to utilise a system of private contracting rather than the recruitment of a permanent group of professional, qualified and trained inspectors.

Children's Commissioner

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71. NASUWT is unable to comment on the proposed establishment of a Children's Commissioner for England without further details on the scope of the post and how it would interface with the direct provision of children's services.
72. It is essential that the Government offer for consultation a detailed definition of the remit of a Children's Commissioner. The role of the Commissioner must neither become confused or misdirected nor should it duplicate the work of other bodies.

Chapter 6: Workforce Reform

73. The workforce reform implications arising from the Green Paper are not inconsiderable. There are many complex and controversial issues to be addressed. That is why NASUWT looks to the Government to explore further with the employers and the relevant trade unions the specific implications for initial training, professional development, deployment, pay and conditions of service for the children's workforce.
74. NASUWT supports the establishment of a Children's Workforce Unit within the DfES, providing that it begins to address not exacerbate the lack of cross departmental unit coordination. It is of vital importance that such a unit is built upon the principle of social partnership with trade unions which has delivered the National Agreement.
75. The Association welcomes the intent to focus the initial work of the Children's Workforce Unit on reducing bureaucracy and workload and that a comprehensive workload survey is planned. The Association recommends that the Department consult with trade unions on the content and methodology of the survey prior to its implementation.
76. The Children's Workforce Unit will need to take account of the work undertaken by the Workforce Agreement Monitoring Group, the DfES School Workforce Unit and the National Remodelling Team established as a consequence of the National Agreement on school workforce reform.
77. School workforce remodelling is set to continue and discussions on further change are currently in progress. Nevertheless, the basic premise remains that teachers should be employed to teach, whilst other activities should be performed by other suitably trained or qualified staff. As a consequence, this will mean that a range of activities traditionally performed by teachers will be undertaken by other professional and support staff. If implemented, the provisions contained in the Green Paper will extend still further the opportunities available for the employment of additional support staff in schools.
78. The proposal that there be a common core of standards and training across professional disciplines is worthy of further exploration. NASUWT accepts that one of the barriers to effective service integration has been the absence of a common language and understanding across the different professional roles. Nevertheless, it is critical that common/core training and development does not result in professional obfuscation. Teachers have a role which is very distinct from that of GPs, and so on. It will be essential that a consensus is reached in terms of the specific contribution

made by each professional discipline in meeting children's developmental, welfare and protection needs.

79. NASUWT is concerned that the Green Paper has not properly addressed the issue of leadership within schools and the need for autonomy of decision making with regard to teaching and learning. Where the school becomes the focus of multi-disciplinary and co-located services, there is no justification for investing the responsibility for managing such provision with headteachers. The headteacher should be employed as the leader of pedagogy, not as a general manager of neighbourhood based children's services.

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