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Llywodraeth Cymru

## Ymgynghoriad – crynodeb o'r ymatebion

Diweddaru rheoliadau cymwysterau  
athrawon ysgol yng Nghymru

Dyddiad cyhoeddi: Ebrill 2012



# Diweddaru rheoliadau cymwysterau athrawon ysgol yng Nghymru

- Cynulleidfa** Pob corff sy'n ymwneud â hyfforddiant cychwynnol athrawon yng Nghymru sy'n arwain at Statws Athro Cymwysedig (SAC); sefydliadau addysg uwch; Cyngor Cyllido Addysg Uwch Cymru (CCAUC); Cyngor y Prifysgolion ar gyfer Addysgu Athrawon Cymru (UCET Cymru); Estyn; Cyngor Addysgu Cyffredinol Cymru (CynACC); Cynghorau Addysgu Cyffredinol Lloegr, yr Alban a Gogledd Iwerddon; awdurdodau lleol yng Nghymru; undebau athrawon a darlithwyr; ysgolion a gynhelir; Cyngor Ysgolion Annibynnol; a phobl eraill â diddordeb.
- Trosolwg** Mae'r ddogfen hon yn rhoi crynodeb o'r ymatebion ac yn rhoi adborth ar yr ymgynghoriad ar gynigion i ddiweddaru'r rheoliadau cymwysterau athrawon ysgol yng Nghymru a fuasai'n newid rhai o'r gofynion ar gyfer y rhai sydd am gael eu cydnabod yn athrawon cymwysedig yng Nghymru.
- Camau i'w cymryd** Dim – er gwybodaeth yn unig.
- Rhagor o wybodaeth** Mae gwybodaeth bellach am yr ymgynghoriad hwn i'w chael gan:  
Gail Deane  
Is-adran Gwella Dysgu a Datblygiad Proffesiynol  
Llywodraeth Cymru  
Parc Cathays  
Caerdydd  
CF10 3NQ  
Ffôn: 029 2082 6530  
e-bost: [teachingenquiries@cymru.gsi.gov.uk](mailto:teachingenquiries@cymru.gsi.gov.uk)
- Additional copies** Mae'r dogfennau ymgynghori i'w cael o wefan Llywodraeth Cymru yn [www.cymru.gov.uk/ymgyngoriadau](http://www.cymru.gov.uk/ymgyngoriadau)

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# 1. Cyflwyniad a throsolwg

1.1 Mae Llywodraeth Cymru wedi ymgynghori ar gynigion i gyflwyno rheoliadau wedi'u diweddarau gan ddisodli Rheoliadau Addysg (Cymwysterau Athrawon Ysgol) (Cymru) 2004 ("Rheoliadau 2004"). Buasai'r rhain yn newid rhai o'r gofynion ar gyfer y rhai sydd am gael eu cydnabod yn athrawon cymwysedig yng Nghymru:

- (a) byddai'n rhaid cyflawni'r cyfnod o brofiad addysgu ymarferol y mae'n ofynnol i unrhyw un ar gwrs hyfforddiant cychwynnol athrawon ("HCA") yng Nghymru ei gyflawni mewn ysgol neu sefydliad addysg arall, yn gyfan gwbl neu'n bennaf mewn man lle mae'r cwricwlwm cenedlaethol yn cael ei gyflwyno;
- (b) ar hyn o bryd, bydd unrhyw un sy'n athro cymwysedig o dan y Rheoliadau Cymwysterau Athrawon Ysgol a luniwyd ar gyfer Lloegr hefyd yn cael ei gydnabod yn athro cymwysedig yng Nghymru. Yn lle hyn, cydnabyddid yn benodol rai yn unig o'r athrawon a gymhwysodd yn Lloegr. Byddai'r ddarpariaeth hon yn golygu mai dim ond y categorïau canlynol o athrawon sy'n cymhwyso yn Lloegr, a fyddai'n cael eu cydnabod yn athro cymwysedig yng Nghymru:-
  - (i) unigolion sy'n cymhwyso drwy gwrs hyfforddiant cychwynnol athrawon mewn sefydliad achrededig yn Lloegr;
  - (ii) y rhai a lwyddodd pan gawsant eu hasesu yn erbyn y safonau penodedig yn Lloegr ond nad ydynt wedi dilyn cwrs hyfforddiant cychwynnol athrawon penodol (sef llwybr Asesu yn Unig);
  - (iii) unigolion sy'n cwblhau'n llwyddiannus gyfnod o hyfforddiant ar gynllun hyfforddi athrawon ar sail cyflogaeth yn Lloegr.

Felly, yng Nghymru, ni fyddai'r cynigion yn ddilys sydd ar droed yn Lloegr i ganiatáu i'r holl athrawon addysg bellach ("AB") a chanddynt statws Athro Cymwysedig Dysgu a Sgiliau (QTLS) ac athrawon a chanddynt gymwysterau llawn o Awstralia, Canada, Seland Newydd a'r Unol Daleithiau fod yn athrawon cymwysedig;

- (c) byddai'n ofynnol i unigolion sydd wedi'u cydnabod yn athrawon yn yr Alban ac yng Ngogledd Iwerddon fod wedi cyflawni cyfnod o brofiad addysgu ymarferol yno er mwyn iddynt gael eu cydnabod yn athrawon cymwysedig yng Nghymru. Byddai hyn yn atal athrawon sydd wedi'u hyfforddi tramor rhag dod yn athrawon cymwysedig yng Nghymru trwy'r Alban neu Ogledd Iwerddon heb fod wedi dysgu yn y Deyrnas Unedig;
- (ch) er mwyn diweddarau'r ddeddfwriaeth, byddai sôn am gydnabod athrawon o Ogledd Iwerddon yn cyfeirio at gofrestrriad gyda Chyngor Addysgu Cyffredinol Gogledd Iwerddon ("Cyngor Addysgu Cyffredinol Gogledd Iwerddon").

1.2 Cynigiwyd hefyd na ddylid caniatáu mwyach i rai athrawon mewn ysgolion annibynnol neu addysg bellach a enillodd gymwysterau cyn 1974, neu 1989 mewn pynciau penodedig, fod yn gymwysedig yng Nghymru. Byddai mân newidiadau a diweddariadau cyffredinol hefyd yn cael eu cyflwyno i Reoliadau 2004.

## 2. Y broses ymgynghori

2.1 Ceisiwyd barn rhanddeiliaid yn gymorth i ystyried y newidiadau polisi arfaethedig. Cyhoeddwyd atodiad pellach i'r ymgynghoriad ar ôl dechrau'r ymgynghoriad. Cafodd y wybodaeth ychwanegol hon ei rhoi i'r holl grwpiau rhanddeiliaid a'i hanfon at bawb o'r rhai a oedd wedi cyflwyno eu hymateb eisoes. Mae'r adroddiad hwn yn crynhoi'r holl sylwadau a dderbyniwyd yn ystod y broses ymgynghori gyhoeddus ynghyd â'n hymateb ni. Cynhwysai rhai o'r ymatebion sylwadau cyffredinol nad oeddent yn gysylltiedig yn uniongyrchol â'r cwestiynau a ofynnwyd a rhoddir sylw manylach i'r rhain yn adran 4.

2.2 Daeth yr ymgynghoriad i ben ar 30 Ionawr 2012. Derbyniwyd cyfanswm o 16 ymateb i'r ymgynghoriad gan sefydliadau. Gan un sefydliad, cafwyd sylwadau ar un yn unig o'r cwestiynau a ofynnwyd. Cafwyd ymatebion gan ddau sefydliad nad oeddent yn dymuno cael eu henwi. Derbyniwyd cyfanswm o 14 ymateb gan unigolion. Gofynnodd wyth o'r unigolion hyn am beidio â chael eu henwi. Mae crynodebau o'r prif bwyntiau a wnaed i'w gweld isod, ynghyd â'r camau a gymerwyd i ymateb i'r rhain ac adborth ar y prif themâu a'r pwyntiau allweddol a wnaed. Mae rhestr yn Atodiad A o'r holl rai a ymatebodd ac eithrio'r 10 sefydliad ac unigolyn a ofynnodd am gadw eu manylion yn gyfrinachol. Mae copïau o'r ymatebion a dderbyniwyd gan sefydliadau ac unigolion a enwyd i'w gweld yn Atodiad B.

2.3 Roedd rhai sylwadau tu allan i gwmpas yr ymgynghoriad ac er y gwnaed pob ymdrech i gysylltu'r ymatebion hyn â themâu penodol yr ymgynghoriad nid oedd modd gwneud hyn bob tro. Fodd bynnag, rhoddwyd sylw llawn i hanfod yr holl sylwadau hyn.

2.4 Mae'r ddogfen ymgynghori a'r ffurflen ymateb ar gyfer yr ymgynghoriad hwn i'w gweld yn adran Addysg a Sgiliau (ymgynghoriadau sydd wedi dod i ben) ar wefan Llywodraeth Cymru yn [www.cymru.gov.uk/ymgyngoriadau](http://www.cymru.gov.uk/ymgyngoriadau).

2.5 Hoffem achub y cyfle hwn i ddiolch i bawb a ymatebodd i'r ymgynghoriad am eu cyfraniad.

### **3. Sylwadau ar y cwestiynau yn yr ymgynghoriad a'n hymateb a'n hadborth ni**

**Cwestiwn 1: Rydym yn cynnig y dylai'r cyfnod o brofiad addysgu ymarferol ar gyfer y sawl sy'n cymhwyso fel athrawon ar gyrsiau hyfforddiant cychwynnol athrawon yng Nghymru gael ei gynnal yn gyfan gwbl neu'n bennaf mewn ysgol neu sefydliad addysgol arall (ac eithrio uned cyfeirio disgyblion) yng Nghymru sy'n bodloni gofynion y cwricwlwm cenedlaethol. A ydych yn cytuno â hyn?**

#### **Pwyntiau a godwyd**

3.1.1 Roedd pedwar ar ddeg o'r un ar bymtheg o sefydliadau a wnaeth sylwadau ar y cwestiwn hwn yn cytuno â'r cynnig ac roedd dau yn anghytuno. Roedd y pedwar ar ddeg o unigolion a ymatebodd yn anghytuno â'r cynnig hwn.

3.1.2 Teimlai'r rhai a gytunai â'r cynnig y disgwylid y byddai gan y rhan fwyaf o athrawon sy'n cymhwyso yng Nghymru brofiad o'r cyfnod perthnasol o addysg a'r rhan gysylltiedig o'r cwricwlwm cenedlaethol. Mynegwyd y farn mai'r ffordd orau o ennill profiad o'r fath wrth hyfforddi yw trwy sefydliadau addysgol sy'n addysgu'r cwricwlwm hwnnw.

3.1.3 Unigolion o ysgolion annibynnol oedd y rhan fwyaf o'r rhai a anghytunai â'r cynnig. Roedd y sylwadau yn cynnwys y dylid caniatáu i athrawon ennill profiad addysgu ymarferol mewn ysgol nad yw'n dysgu'r cwricwlwm cenedlaethol ar yr amod bod y rhan fwyaf o bynciau'r cwricwlwm (gan gynnwys yr un y mae'r athro yn hyfforddi ar gyfer ei addysgu) yn cael eu haddysgu yno. Teimlai rhai o'r ymatebion hyn fod addysgu Cymraeg fel rhan o'r cwricwlwm yn amhriodol yn y rhan fwyaf o ysgolion annibynnol. Mynegwyd pryder y byddai'r cynnig hwn yn atal athrawon mewn ysgolion annibynnol rhag cymhwyso trwy gynlluniau hyfforddi athrawon ar sail cyflogaeth neu y byddai'n atal sefydlu athrawon newydd gymhwyso mewn ysgolion annibynnol.

3.1.4 Gofynnodd ychydig o atebion pa ganran o amser a dreulir 'yn bennaf' mewn ysgol neu sefydliad addysgol arall fyddai'n cyfrif.

3.1.5 Teimlai un sefydliad, gan gytuno â'r cynnig, y dylai cyflenwyr HCA sy'n rhedeg TAR uwchradd ystyried lleoliadau mewn colegau addysg bellach ar gyfer profiad addysgu ymarferol er mwyn adlewyrchu llwybrau 14-19. Roedd o'r farn bod y llwybrau yn hanfodol er mwyn cyflwyno'r cwricwlwm cenedlaethol presennol. Mynegodd yr un sefydliad farn ar gyrsiau TAR (AB) addysg bellach, er nad oedd hyn o fewn cwmpas yr ymgynghoriad. Awgrymodd sefydliad arall a gytunai â'r cynnig y byddai'n fuddiol i bob hyfforddai dreulio rhan o'r cyfnod o brofiad addysgu ymarferol mewn uned cyfeirio disgyblion.

3.1.6 Teimlai un sefydliad efallai na fyddai modd cynnal y profiad addysgu ymarferol yn gyfan gwbl neu'n bennaf yng Nghymru mewn rhai pynciau petai'n rhaid

i'r ysgol neu'r sefydliad addysgol gwrdd â gofynion y cwricwlwm cenedlaethol. Roeddent hefyd o'r farn y gallai rhai dybio mai ystyr y gofyniad hwn yw bod yn rhaid wrth brofiad ymarferol o addysgu'r Cwricwlwm Cymreig er mwyn i athrawon sydd wedi hyfforddi yng Nghymru allu gweithio fel athro ac y byddai ymagwedd o'r fath yn taseilio gwerthoedd a phwysigrwydd sgiliau trosglwyddadwy a chcludadwyedd cyflogaeth. Teimlent fod egwyddorion ac arferion addysgegol yn ogystal â gwybodaeth a dealltwriaeth bynciol yn bwysicach na phrofiad ymarferol o addysgu'r Cwricwlwm Cymreig. Roeddent hefyd o'r farn nad oedd y cynnig yn gydnaws â'r ffaith y gellir cydnabod fel athrawon yng Nghymru rai a hyfforddwyd y tu allan i Gymru ac nad oedd wedi ymdrin â'r cwricwlwm Cymreig.

## **Sut rydym yn bwriadu mynd i'r afael â'r sylwadau hyn**

3.1.7 Mae'n debyg bod llawer o'r sylwadau ynghylch sefyllfa ysgolion annibynnol yn deillio o gamddealltwriaeth, gan fod y rhan o'r rheoliadau cymhwyso sy'n gofyn am gyfnod o brofiad addysgu ymarferol i'r rhai sy'n cymhwyso fel athrawon ar gyrsiau HCA yng Nghymru yn berthnasol i gyrsiau sy'n cael eu rhedeg trwy sefydliadau addysg uwch yn unig. Ni fyddai'r newid arfaethedig hwn yn cynnwys rhaglenni hyfforddi athrawon sy'n seiliedig ar gyflogaeth; darperir ar gyfer y rhain mewn cynllun arall a dogfennau polisi a threfniadau a gyflwynir dan y cynllun hwnnw. Hefyd, nid yw'r cynnig yn newid y sefyllfa o ran ymsefydlu ar gyfer athrawon newydd gymhwyso. Trafodir hynny mewn rheoliadau eraill.

3.1.8 Cynigiwn y dylid gweithredu mewn ffordd hyblyg y gofyniad i gynnal y cyfnod o brofiad addysgu ymarferol yn gyfan gwbl neu'n bennaf mewn ysgol neu sefydliad addysgol arall yng Nghymru sy'n cwrdd â gofynion y cwricwlwm cenedlaethol. Y cynnig yw mai'r elfen o'r cwricwlwm cenedlaethol y mae angen ei dysgu (mewn perthynas â'r cyfnod sylfaen neu gyfnodau allweddol dau, tri neu bedwar) fyddai'r un sy'n briodol i'r ysgol neu'r sefydliad addysgol ac y byddai'n cyfateb i'r cwrs HCA ac yn briodol i'r cwrs.

3.1.9 Mae'r ymadrodd "yn gyfan gwbl neu'n bennaf" mewn perthynas â'r cyfnod o brofiad addysgu ymarferol wedi'i gynnwys yn y rheoliadau cymhwyso ers Medi 2003. Ni theimlid ei bod yn briodol darparu diffiniad penodol na phennu cyfran arbennig gan fod gofyniad statudol ar bob cyflenwr HCA i sicrhau bod hyfforddiant yn ystyried anghenion hyfforddi unigol. Mae cyngor ar y mater hwn i'w weld yn "Dod yn Athro Cymwysedig: Llawlyfr Canllawiau", Cylchlythyr Rhif 017/2009, yn adrannau G2.1 (cynllun y rhaglen) a G2.5 (amser yn yr ysgol).

3.1.10 Mae'r ddeddfwriaeth bresennol a'r ddeddfwriaeth arfaethedig yn cyfeirio at gynnal profiad addysgu ymarferol yn gyfan gwbl neu'n bennaf yng Nghymru mewn ysgol neu sefydliad addysgol ac felly petai cyflenwr HCA yn teimlo ei bod yn addas gallai ystyried lleoliadau mewn colegau addysg bellach mewn rhai amgylchiadau fel rhan o'r profiad addysgu ymarferol. Fodd bynnag, byddai angen i gyflenwyr HCA sicrhau bod unrhyw hyfforddiant tu allan i ysgolion a gynhelir yng Nghymru yn cyfrannu at allu hyfforddai i fodloni'r Safonau SAC ac nad yw'n effeithio'n andwyol ar weddill y rhaglen hyfforddi. Yn yr un modd, gallai cyflenwyr HCA drefnu i hyfforddeion dreulio peth amser mewn uned gyfeirio disgyblion fel ategiad at raglen HCA. Fodd bynnag, mae uned gyfeirio disgyblion yn cael ei heithrio'n benodol o'r cyfnod angenrheidiol o brofiad addysgu ymarferol a gynhelir yn gyfan gwbl neu'n

bennaf yng Nghymru gan na all ei darpariaeth benodol alluogi hyfforddai i ddangos yn llawn ei fod yn bodloni'r Safonau SAC.

3.1.11 Nid ydym yn credu y byddai unrhyw anhawster i gyflenwyr HCA drefnu i brofiad addysgu ymarferol gael ei gynnal yn gyfan gwbl neu'n bennaf yng Nghymru. Mae'r mwyafrif helaeth o'r profiad addysgu ymarferol hwnnw eisoes yn digwydd mewn ysgolion a gynhelir yng Nghymru, sydd o reidwydd yn bodloni gofynion y cwricwlwm cenedlaethol. Ni dderbyniwyd unrhyw ymatebion ar y mater hwn gan gyflenwyr HCA.

3.1.12 Un o nodweddion canolog y Safonau SAC yw gofynion sy'n ymwneud â'r cwricwlwm. Mae'n rhaid i hyfforddeion ddangos bod ganddynt wybodaeth a dealltwriaeth gadarn o'r pwnc/pynciau a'r cwricwlwm y maent yn hyfforddi i'w dysgu. Mae'n rhaid iddynt ddangos hefyd y gallant addysgu'n ddigonol ac yn annibynnol y sgiliau, yr wybodaeth a'r ddealltwriaeth sydd eu hangen neu a ddisgwylir ac sy'n berthnasol i'r cwricwlwm ar gyfer dysgwyr yn yr oedran y maent yn hyfforddi i'w haddysgu ac mae profiad addysgu ymarferol yn elfen hanfodol yn hyn o beth. Mae'r gofynion cyfreithiol hyn yn bodoli ers blynnyddoedd lawer, a hefyd y Cwricwlwm Cymreig statudol.

3.1.13 Fel y nododd y ddogfen ymgynghori, dan y darpariaethau presennol byddai angen i gyflenwyr HCA sicrhau bod cyfran sylweddol o brofiad addysgu ymarferol hyfforddeion yn digwydd mewn ysgolion sy'n cyflwyno'r cwricwlwm cenedlaethol er mwyn cyflenwi eu dyletswydd o dan y gofynion statudol ar gyfer cyrsiau HCA (dylunio cynnwys, strwythur a darpariaeth hyfforddiant mewn modd a fydd yn galluogi athrawon dan hyfforddiant i ddangos eu bod wedi bodloni'r safonau SAC statudol). Byddai'r ddarpariaeth arfaethedig yn nodi'r sefyllfa yn fwy amlwg, er mwyn osgoi unrhyw gamddealltwriaeth.

3.1.14 Nid ydym yn credu y byddai ymagwedd o'r fath yn tanseilio gwerthoedd a phwysigrwydd sgiliau trosglwyddadwy a chcludadwyedd cyflogaeth. Fel y nodwyd, adlewyrchu'n gliriach y mae hyn yn y bôn sefyllfa sy'n bodoli eisoes. Mae SAC a enillir yng Nghymru trwy gyrsiau HCA sy'n cael eu rhedeg trwy sefydliadau addysg uwch yng Nghymru yn cael ei gydnabod mewn rhannau eraill o'r DU a'r Undeb Ewropeaidd ac ni fyddai'r cynnig hwn yn effeithio ar hynny.

3.1.15 Mae llawer o wledydd yn cydnabod bod cymwysterau a geir mewn gwledydd eraill yn gyfwerth er nad ydynt yn cyfateb ym mhob agwedd. Mae'n amlwg na fydd athrawon sydd wedi eu hyfforddi y tu allan i Gymru ac sy'n dod i weithio yma, wedi dilyn y cwricwlwm Cymreig ar eu cyrsiau ond byddai'n wrthnysig i awgrymu bod hyn yn golygu na ddylid cynnwys elfennau Cymreig penodol megis y cwricwlwm ar gyrsiau yng Nghymru.

**Cwestiwn 2: Rydym am ddisodli'r ddarpariaeth yn Rheoliadau Addysg (Cymwysterau Athrawon Ysgol) (Cymru) 2004 sy'n cydnabod fel athro cymwysedig yng Nghymru unrhyw unigolyn sy'n athro cymwysedig yn rhinwedd y rheoliadau a wnaed mewn perthynas â Lloegr gyda darpariaeth fwy penodol sydd ond yn cwmpasu categorïau penodol o bobl sy'n cymhwyso yn Lloegr.**

**Byddai'r ddarpariaeth newydd hon yn cwmpasu pobl sy'n cymhwyso fel athro yn Lloegr drwy:**

- (i) cwrs hyfforddiant cychwynnol athrawon mewn sefydliad achrededig yno;**
- (ii) asesiad yn erbyn y safonau penodedig yno, ond heb ymgymryd â chwrs hyfforddiant cychwynnol athrawon penodol (a elwir yn llwybr Aseiad yn Unig);**
- (iii) cwblhau'n llwyddiannus gyfnod o hyfforddiant ar gynllun hyfforddiant athrawon ar sail cyflogaeth yn Lloegr.**

**A ydych yn cytuno â hyn?**

**Pwyntiau a godwyd**

3.2.1 Roedd deuddeg o'r pymtheg sefydliad a wnaeth sylwadau ar y cwestiwn yn cytuno â'r cynnig hwn, roedd un yn anghytuno â rhan o'r cynnig ac yn cytuno â rhan arall ac roedd tri yn ansicr. Awgrymodd un o'r sefydliadau a gytunai â'r cynnig, wrth ymateb i gwestiwn arall, y byddent efallai yn anghytuno â rhan ohono. Roedd deuddeg o'r pedwar ar ddeg o unigolion a ymatebodd yn anghytuno â'r cynnig hwn ac roedd dau yn ansicr.

3.2.2 Nid oedd yr un o'r atebion a dderbyniwyd gan Gynghorau Addysgu Cyffredinol yn anghytuno â'r cynnig. Teimlai Cyngor Addysgu Cyffredinol Cymru ei fod yn ddoeth o ystyried y sefyllfa o ran y cyflenwad o athrawon a'r ffaith y gall athrawon addysg bellach addysgu pynciau galwedigaethol mewn ysgolion a gynhelir yng Nghymru yn awr fel rhan o gwricwla lleol dan Fesur Dysgu a Sgiliau (Cymru) 2009. Nododd Cyngor Addysgu Cyffredinol yr Alban 'ansicr' ond fe nodwyd bod eu gofynion yn fwy caeth na'r cynnig hwn ar hyn o bryd, gan dderbyn athrawon o system Lloegr sydd wedi cwblhau llwybr (i) yn llwyddiannus yn unig; roedd posibilrwydd y gallai Rhaglenni Athrawon Graddedig penodol (llwybr (iii)) sy'n bodloni gofynion yr Alban gael eu hachredu yn y dyfodol. Teimlai Cyngor Addysgu Cyffredinol Gogledd Iwerddon fod y categorïau a nodwyd yn rhesymol ac yn gyson â'r drefn a ddilyniir ganddynt yng Ngogledd Iwerddon.

3.2.3 Dywedodd un sefydliad a gytunai â'r cynnig ei bod yn bwysig bod yr eithriadau a roddir dan Reoliadau Addysg (Gwaith Penodedig a Chofrestru) (Cymru) 2010 yn glir ynghylch y gwahaniaeth rhwng yr athrawon addysg bellach

cymwys hynny sy'n cael addysgu mewn ysgolion heb gyfyngiad a'r rhai nad ydynt yn cael. Awgrymodd yr un sefydliad mewn ymateb i gwestiwn arall y dylai athrawon sydd â chymhwyster llawn o wledydd eraill megis rhai o wledydd y gymanwlad gael addysgu mewn ysgolion fel athrawon cymwys heb orfod dilyn hyfforddiant neu gael asesiad pellach.

3.2.4 Roedd gan un sefydliad a oedd yn ansicr bryderon ynghylch cynnwys y llwybr Aseiad yn Unig ar bwynt (ii) a gofynnwyd am sicrwydd bod y llwybr hwn yn ddigon cadarn o ran safonau ar gyfer ymarfer addysgu llwyddiannus.

3.2.5 Roedd sefydliad arall yn ansicr a fyddai'r newid arfaethedig i gymwysterau penodol yn cyfyngu ar allu athrawon sydd â chymwysterau priodol i symud yn rhydd rhwng addysgu yng Nghymru a Lloegr mewn unrhyw ffordd. Teimlent y dylid diogelu'r gallu hwnnw.

3.2.6 Cytunodd un sefydliad â'r cynnig mewn perthynas â pheidio â chydabod athrawon addysg bellach sydd â Statws Athro Cymwysedig Dysgu a Sgiliau fel athrawon cymwysedig yng Nghymru. Eu barn nhw oedd y dylid cadw SAC fel y cymhwyster i athrawon sy'n gweithio mewn ysgolion.

3.2.7 Anghytunai'r un sefydliad â'r cynnig yn yr ystyr y byddai'n golygu na fyddai athrawon â chymwysterau llawn o Awstralia, Canada, Seland Newydd a'r Unol Daleithiau (a fyddai'n dod yn athrawon cymwysedig yn Lloegr o dan newidiadau arfaethedig a gyhoeddwyd gan yr Adran Addysg) yn cael eu cydnabod fel athrawon cymwysedig yng Nghymru. Teimlent nad oedd rheswm y gellir ei gyfiawnhau'n wrthrychol dros y cyfyngiad hwn ac nid oeddent yn hapus y byddai'n ofynnol i athrawon o wledydd tu allan i'r Ardal Economaidd Ewropeaidd neu'r Swistir ddilyn hyfforddiant ac asesiad pellach. Teimlent hefyd y dylid profi nad yw'r safonau a'r lefelau ansawdd sy'n ofynnol mewn gwledydd tramor cystal â Safonau SAC.

3.2.8 Teimlai'r unigolion a anghytunai â'r cynnig y dylid cael ymagwedd unffurf at gymwysterau athrawon rhwng gwledydd y DU. Dadleuodd rhai y dylid derbyn cymwysterau addysgu tramor. Dadleuodd un y caiff athrawon sydd wedi cymhwyso yng Nghymru addysgu yn Lloegr ac felly dylai'r rhai a gymhwysodd yn Lloegr gael dysgu yng Nghymru. Awgrymodd un y byddai'r cynnig yn wahaniaethol mewn perthynas â deddfwriaeth cyflogaeth yr Undeb Ewropeaidd.

## **Sut rydym yn bwriadu mynd i'r afael â'r sylwadau hyn**

3.2.9 O ran beth mae athrawon addysg bellach yn cael ei wneud ar hyn o bryd mewn ysgolion a gynhelir yng Nghymru, nododd y ddogfen ymgynghori bod Rheoliadau Addysg (Gwaith Penodedig a Chofrestru) (Cymru) 2010 ("y rheoliadau gwaith penodedig") eisoes yn caniatáu i athrawon addysg bellach cymwysedig wneud gwaith addysgu mewn ysgolion a gynhelir yng Nghymru dan rai amgylchiadau. Mae'r rheoliadau gwaith penodedig yn glir ynghylch yr amgylchiadau lle mae hyn yn gallu digwydd: mae'n rhaid i'r gwaith addysgu dan y ddarpariaeth arbennig hon fod yn waith sy'n cyflwyno cyrsiau galwedigaethol fel rhan neu'r cyfan o gwricwlwm lleol dan Fesur Dysgu a Sgiliau (Cymru) 2009. Cwricwlwm lleol yw un a luniwyd gan awdurdod lleol dan adran 116A Deddf Addysg 2002 (ar gyfer y rhai 14 i 16 oed); neu gan Weinidogion Cymru dan adran 33A Deddf Dysgu a Sgiliau

2000 (ar gyfer y rhai 16 i 18 oed). Yn y bôn, mae'r ddarpariaeth hon yn caniatáu i athrawon addysg bellach cymwysedig gyflwyno agweddau o addysgu addysg bellach mewn perthynas â chyrsgiau galwedigaethol mewn ysgol a gynhelir.

3.2.10 Mae'r rheoliadau gwaith penodedig yn darparu opsiwn arall i athrawon addysg bellach wneud gwaith addysgu mewn ysgolion a gynhelir yng Nghymru, er nad yw'n gyfyngedig i athrawon addysg bellach yn benodol. Gall unigolion sydd â "chymwysterau arbennig neu brofiad arbennig" addysgu unrhyw gelfyddyd neu sgil, neu unrhyw bwnc, mewn ysgolion a gynhelir yng Nghymru lle mae angen cymwysterau arbennig neu brofiad arbennig neu'r ddau er mwyn gwneud hyn. Fodd bynnag, ni ellir caniatáu hyn oni bai nad oes athro addas â SAC neu athro ar y cynllun hyfforddi athrawon ar sail cyflogaeth ar gael ar gyfer penodiad o'r fath (neu yn achos cyflwyno cyrsiau galwedigaethol fel rhan neu'r cyfan o gwricwlwm lleol, nad oes athro addysg bellach cymwys addas), a dim ond tra bo'r sefyllfa honno'n para. Mae'n rhaid i'r ysgol neu'r awdurdod lleol dan sylw fod yn fodlon ynghylch cymwysterau a/neu brofiad yr unigolyn.

3.2.11 Mae disodli'r ddarpariaeth lle mae unrhyw un sy'n athro cymwysedig yn Lloegr hefyd yn athro cymwysedig yng Nghymru a chyflwyno yn ei lle ddarpariaeth fwy penodol sy'n cynnwys rhai categorïau yn unig o bobl sy'n gymwys yn Lloegr, wedi cael ei geirio i gynrychioli'r holl lwybrau at SAC a gydnabyddir ar hyn o bryd. Mae'r llwybr Asesiad yn Unig yn cynnwys asesiad penodol o unigolion yn erbyn yr un safonau SAC yn Lloegr â'r rhai sy'n rheoli llwybrau eraill.

3.2.12 Ni fyddai'r newid arfaethedig yn cyfyngu ar allu athrawon sydd eisoes yn gymwysedig i symud yn rhydd rhwng addysgu yng Nghymru a Lloegr ac ni fyddai chwaith yn effeithio ar y rhai fydd yn cymhwyso yn y dyfodol trwy'r llwybrau a dderbynnir ar hyn o bryd. Yr unig gyfyngiad fyddai ar unrhyw athrawon yr ystyrir eu bod yn gymwysedig trwy sefyllfaoedd nad ydynt yn y ddeddfwriaeth bresennol. Fel y nodwyd yn y ddogfen ymgynghori, petai ein rheoliadau arfaethedig i ddiweddarau cymwysterau a'r newid arfaethedig gan yr Adran Addysg yn Lloegr yn cael eu rhoi ar waith, ystyr hyn yw y byddai gan athrawon sydd â chymwysterau llawn o Awstralia, Canada, Seland Newydd a'r Unol Daleithiau SAC yn Lloegr a byddent yn cael addysgu mewn ysgolion yno fel athrawon cymwysedig. Fodd bynnag, ni fyddent yn cael eu cydnabod fel athrawon cymwysedig yng Nghymru.

3.2.13 Byddai'r newid arfaethedig hefyd yn golygu y bydd gan athrawon sydd wedi cymhwyso yng Nghymru ac sy'n cael addysgu yn Lloegr wedi ennill SAC ar lwybrau sy'n cael eu derbyn hefyd yng Nghymru ar gyfer athrawon sydd wedi cymhwyso yn Lloegr. Nid yw hyn yn newid y sefyllfa bresennol.

3.2.14 Mae'r papur ymgynghori yn nodi'n glir y gall rhai gwledydd tramor fod â systemau hyfforddiant cychwynnol athrawon a chymwysterau addysgu sydd â safonau a lefelau ansawdd tebyg i'r DU. Fodd bynnag, roeddem yn glir, er y gallai hyn ddangos addasrwydd cymharol athrawon o'r gwledydd hyn i addysgu yn y DU, na fyddem yn ystyried bod hyn yn golygu y gellid ystyried bod cymhwyster addysgu o'r gwledydd hyn yn cyfateb yn llawn mewn perthynas â'r gofynion yn y Safonau SAC.

3.2.15 Un o brif elfennau'r Safonau SAC yw eu bod yn mynnu bod yn rhaid i hyfforddeion ar gyrsiau HCA ddangos bod ganddynt wybodaeth a dealltwriaeth gadarn o'r cwricwlwm y maent yn hyfforddi i'w ddysgu. Mae nifer o elfennau yn y cwricwlwm sy'n benodol i Gymru. Mae'r Safonau SAC yn cynnwys nifer o'r rhain yn benodol, gan gynnwys Datblygu'r Gymraeg yn y Cyfnod Sylfaen; digon o wybodaeth o'r Gymraeg fel ail iaith i allu ei dysgu yng Nghyfnod Allweddol 2; mewn perthynas â'r oedran y maent yn hyfforddi i'w ddysgu, maent yn deall y dylid rhoi cyfle i ddysgwyr 7-14 oed yng Nghymru, lle mae'n briodol, ddatblygu a chymhwyso eu gwybodaeth a'u dealltwriaeth o nodweddion diwylliannol, economaidd, amgylcheddol, hanesyddol a ieithyddol Cymru (y Cwricwlwm Cymreig); ac y dylid rhoi cyfle i ddysgwyr 14-19 oed ymgysylltu yn weithredol er mwyn deall agweddau gwleidyddol, cymdeithasol, economaidd a diwylliannol Cymru fel rhan o'r byd cyfan (Cymru, Ewrop a'r Byd). Credwn, felly, na ddylai athrawon sydd wedi hyfforddi dramor gael addysgu mewn ysgolion yng Nghymru fel athrawon cymwysedig i'r hirdymor heb broses sy'n arwain at eu hasesu yn erbyn y Safonau SAC.

3.2.16 Byddai'r cynnig yn golygu y byddai'n ofynnol i athrawon o wledydd tu allan i'r Ardal Economaidd Ewropeaidd neu'r Swistir ddilyn rhagor o hyfforddiant ac asesiad. Fodd bynnag, felly mae hi ar hyn o bryd hefyd ac felly ni fyddai'r sefyllfa yn newid.

3.2.17 Mae gwahaniaethau yn ymagwedd gwahanol wledydd y DU at gymwysterau athrawon ers blynyddoedd lawer erbyn hyn. Fel y nodwyd ym mharagraff 3.2.2, er enghraifft, nid yw'r Alban yn derbyn athrawon sydd wedi ennill SAC trwy lwybrau addysgu sy'n seiliedig ar gyflogaeth megis y Rhaglen Athrawon Graddedig. Gall y gwahaniaethau hyn adlewyrchu ymagweddau gwahanol at gymhwyso athrawon ac at addysg yn gyffredinol ac mae gan wahanol wledydd y DU yr hawl i fabwysiadu'r gwahanol ymagweddau hyn sy'n adlewyrchu'r blaenoriaethau yn y gwledydd hynny. Yn yr achos arbennig hwn byddai'r cynnig yn berthnasol i Loegr yn unig fel rhan arall o'r DU ac ni fyddai'n effeithio ar aelod-wladwriaethau eraill.

**Cwestiwn 3: Rydym am atal rhywun a all fod wedi cael ei gydnabod fel athro yn yr Alban neu Ogledd Iwerddon heb iddo/iddi fod wedi addysgu yn y gwledydd hynny rhag gallu cymhwyso fel athro yng Nghymru. Rydym yn cynnig y dylid pennu gofyniad sy'n nodi bod yn rhaid gweithio 60 diwrnod mewn sefydliad addysgol yn y gwledydd hynny. A ydych yn cytuno â hyn?**

### **Pwyntiau a godwyd**

3.3.1 Roedd tri ar ddeg o'r pymtheg sefydliad a wnaeth sylwadau ar y cwestiwn hwn yn cytuno â'r cynnig hwn, anghytunai un ac roedd un yn ansicr. Roedd tri ar ddeg o'r pedwar ar ddeg o unigolion a atebodd yn anghytuno â'r cynnig hwn ac roedd un yn ansicr.

3.3.2 Roedd Cyngor Addysgu Cyffredinol yr Alban, Cyngor Addysgu Cyffredinol Gogledd Iwerddon ac Adran Addysg Gogledd Iwerddon ymhlith y sefydliadau a gefnogai'r cynnig hwn. Roedd Cyngor Addysgu Cyffredinol Cymru yn cytuno'n llwyr y dylid cyflwyno'r ddarpariaeth hon.

3.3.3 Roedd y sefydliad a anghytunai â'r cynnig hwn yn teimlo ei fod ynghylch cyflogadwyedd yn hytrach nag addasrwydd cymwysterau addysgu. Awgrymodd nad oedd y cynnig yn rhesymegol gan na osodwyd yr un gofyniad ar athrawon tramor a dderbyniodd SAC yn Lloegr, a themlai'r sefydliad y gallai'r cynnig fod yn agored i her gyfreithiol.

3.3.4 Roedd yr unigolion a anghytunai â'r cynnig yn teimlo y dylai SAC a enillwyd mewn un rhan o'r DU gael ei dderbyn ym mhob rhan arall o'r DU. Un sylw a wnaed oedd nad oedd yn bwysig lle y dilynwyd yr hyfforddiant ac y dylai'r athrawon gorau gael dysgu mewn unrhyw le ac y byddai'r cynnig yn rhwystro athrawon dawnus rhag dod i Gymru. Roedd un atebwydd yn credu y gellid darllen y cynnig i awgrymu nad oedd hyfforddi athrawon mor effeithiol yn yr Alban neu Ogledd Iwerddon ag yng Nghymru.

### **Sut rydym yn bwriadu mynd i'r afael â'r sylwadau hyn**

3.3.5 Caiff athrawon sy'n cymhwyso yn yr Alban a Gogledd Iwerddon eu cydnabod fel athrawon cymwysedig yng Nghymru trwy ddau lwybr, sef y rhai sy'n cymhwyso trwy gyrsiau HCA yn y gwledydd hynny a'r rhai sy'n cymhwyso trwy gael eu cydnabod gan yr awdurdodau priodol yn y gwledydd hynny. Mae'r cynnig sy'n destun ymgynghoriad yn ymwneud â'r ail lwybr yn unig. Mae'n ymddangos ei bod yn bosibl i athrawon sydd wedi hyfforddi dramor gael cydnabyddiaeth ymlaen llaw gan yr awdurdodau priodol yn yr Alban neu Ogledd Iwerddon heb ddysgu yn y gwledydd hynny a heb wneud HCA yno.

3.3.6 Er mwyn ennill cofrestriad llawn gyda Chyngor Addysgu Cyffredinol yr Alban, mae'n ofynnol i athrawon gwblhau cyfnod o wasanaeth ar brawf o ddim llai na 60 diwrnod gan weithio mewn ysgol yn y wlad honno. Credwn, ar gyfer athrawon sy'n dibynnu ar eu cydnabyddiaeth gan Gyngor Addysgu Cyffredinol yr Alban ar gyfer mynediad i statws athro cymwysedig yng Nghymru, ei bod yn rhesymol mynnu bod y gydnabyddiaeth hon ar lefel y cofrestriad llawn hwn. Credwn hefyd ei bod yn rhesymol y dylai'r un gofyniad o weithio am 60 diwrnod fod yn berthnasol i athrawon sy'n dibynnu ar eu cydnabyddiaeth gan yr awdurdodau priodol fel athro yng Ngogledd Iwerddon.

3.3.7 Ni fyddai'r math hwn o ofyniad yn berthnasol i athrawon sy'n ennill SAC yn Lloegr, gan nad oes llwybr cyfatebol ar wahân yno i gymhwyso trwy gael cydnabyddiaeth gan yr awdurdodau priodol. Heblaw'r rhai sy'n cymhwyso mewn gwledydd eraill yn y DU neu'r Ardal Economaidd Ewropeaidd neu'r Swistir, yr unig ffyrdd o ennill SAC yn Lloegr ar hyn o bryd yw trwy lwybrau sydd eisoes yn cael eu cydnabod yng Nghymru a hefyd yn cael eu cydnabod yn yr un modd yn yr Alban neu Ogledd Iwerddon. Byddai'r ychwanegiad arfaethedig yn Lloegr i gydnabod athrawon sydd â chymwysterau llawn o Awstralia, Canada, Seland Newydd a'r Unol Daleithiau yn eu galluogi i addysgu mewn ysgolion yn Lloegr fel athrawon cymwysedig heb ddilyn unrhyw hyfforddiant neu asesiad pellach a swyddogaeth yr Asiantaeth Addysgu newydd fyddai dim ond i wirio cymwysterau addysgu unigolion o dramor ar ôl iddynt ddangos llythyr oddi wrth yr awdurdod perthnasol dramor.

3.3.8 Fel y nodwyd ym mharagraff 3.2.17, mae gwahaniaethau hirsefydlog yn barod yn yr ymagwedd at gymwysterau athrawon rhwng gwledydd y DU. Mae'r

gofyniad mewn perthynas â'r rhai sy'n dibynnu ar gydnabyddiaeth gan Gyngor Addysgu Cyffredinol yr Alban fel mynediad i statws athro cymwysedig yng Nghymru yn adlewyrchu'r arferion yn yr Alban ei hun. Y cyfan y mae'n ei wneud yw gosod safon gyfatebol ar gyfer y rhai sy'n gofrestrdig gyda Chyngor Addysgu Cyffredinol Gogledd Iwerddon.

3.3.9 Nid yw'r cynnig yn dweud dim am safon HCA yn yr Alban a Gogledd Iwerddon: mae'r rhai sydd wedi llwyddo i gwblhau cwrs HCA mewn sefydliad addysgol yn yr Alban neu Ogledd Iwerddon yn cael eu cydnabod yn athrawon cymwysedig yng Nghymru a bydd y gydnabyddiaeth hon yn parhau. Mae'r cynnig yn ymwneud yn unig â'r rhai sy'n ennill cofrestrdig gan y ddau Gyngor Addysgu Cyffredinol heb gwblhau HCA yn y gwledydd hynny.

#### **Cwestiwn 4: A ydych yn cytuno, ar gyfer y sawl a allai fod yn athrawon cymwysedig yn rhinwedd y ffaith iddyn nhw gael eu cydnabod fel athrawon mewn ysgolion yng Ngogledd Iwerddon, y dylem gyfeirio nawr at eu cofrestrdig gyda Chyngor Addysgu Cyffredinol Gogledd Iwerddon?**

##### **Pwyntiau a godwyd**

3.4.1 Roedd un ar ddeg o'r pymtheg sefydliad a wnaeth sylwadau ar y cwestiwn hwn yn cytuno â'r cynnig hwn ac roedd pedwar yn ansicr. Roedd un o'r pedwar ar ddeg o unigolion a atebodd yn cytuno â'r cynnig hwn, roedd wyth yn anghytuno ac roedd pump yn ansicr.

3.4.2 Nododd Cyngor Addysgu Cyffredinol Gogledd Iwerddon fod y cynnig hwn yn cydnabod ac yn adlewyrchu newidiadau yng Ngogledd Iwerddon ac fe groesawodd y Cyngor y cynnig. Cefnogodd Cyngor Addysgu Cyffredinol Cymru y cynnig hwn, gan ddweud y byddai'n sicrhau cysondeb â'r dull presennol ar gyfer athrawon o'r Alban.

3.4.3 Dywedodd un sefydliad a oedd yn ansicr fod hyn yn adlewyrchu'r ansicrwydd a fyddai Cyngor Addysgu Cyffredinol Gogledd Iwerddon yn dal i fodoli, o wybod bod Cyngor Addysgu Cyffredinol Lloegr yn cael ei ddiddymu. Fodd bynnag, ychwanegodd fod y cynnig hwn yn synhwyrol tra mae Cyngor Addysgu Cyffredinol Gogledd Iwerddon yn bodoli ac yn gweithredu i'w safonau presennol.

3.4.4 Credai sefydliad arall a oedd yn ansicr y dylid trafod y mater hwn â'r weinyddiaeth ddatganoledig yng Ngogledd Iwerddon. Awgrymodd fod y cynnig yn y ddogfen lle rhoddir gwybodaeth ychwanegol yn fwy priodol (sef bod athrawon sydd â hawl i ymarfer yn y Deyrnas Unedig o dan Reoliadau'r Cymunedau Ewropeaidd (Cydnabod Cymwysterau Proffesiynol) 2007 yn cael eu cydnabod fel athrawon cymwysedig a bod rhaid iddynt gael hysbysiad ysgrifenedig gan Weinidogion Cymru neu'r Cyngor Addysgu Cyffredinol yn nodi hyn).

3.4.5 Gwnaeth yr unigolion nad oedd yn cytuno â'r cynnig nifer o wahanol bwyntiau. Roedd un o'r farn bod y cynghorau addysgu cyffredinol wedi methu a gofynnodd a oedd eu hangen gan nad oeddent ym marn yr unigolyn hwnnw yn cynnig llawer a'u bod yn gostus. Dywedodd un arall, os cafodd athro ei hyfforddi yng

Ngogledd Iwerddon y dylid caniatáu iddo gael ei gyfnod ymsefydlu mewn unrhyw le yn y DU. Nododd unigolyn arall, os oedd pobl yn athrawon cymwysedig, nad oedd cofrestriad o bwys ac na fyddai'n eu gwneud yn well athrawon.

3.4.6 Nododd un unigolyn nad oedd yn sicr, os oedd y safonau ar gyfer cydnabyddiaeth yng Ngogledd Iwerddon yn gyfatebol â gweddill y DU yna dylid cydnabod y sgiliau hynny ledled y DU. Awgrymodd un arall nad oedd a wnelo hyn ddim â Chymru.

### **Sut rydym yn bwriadu mynd i'r afael â'r sylwadau hyn**

3.4.7 Mae Cyngor Addysgu Cyffredinol Gogledd Iwerddon yn gweithredu ac nid oes unrhyw gynigion ar y gweill sy'n awgrymu na fydd yn dal i fodoli. Mae cydnabod cofrestriad gyda Chyngor Addysgu Cyffredinol Gogledd Iwerddon yn angenrheidiol er mwyn cydnabod y ffeithiau.

3.4.8 Ymgynghorwyd ag Adran Addysg Gogledd Iwerddon a hefyd Cyngor Addysgu Cyffredinol Gogledd Iwerddon ynghylch y cynnig hwn. Cytunai'r ddau gorff. Mae'r broses ar gyfer cydnabod athrawon sydd â hawl i ymarfer yn y Deyrnas Unedig o dan Reoliadau'r Cymunedau Ewropeaidd (Cydnabod Cymwysterau Proffesiynol) 2007 yn berthnasol i wledydd tu allan i'r DU; nid yw'r ddeddfwriaeth yn berthnasol o fewn y DU.

3.4.9 Rydym yn nodi'r safbwyntiau ynghylch y cynghorau addysgu cyffredinol ond gan fod Cyngor Addysgu Cyffredinol Gogledd Iwerddon (yn yr achos hwn) yn bodoli mae angen i ni ei ystyried. Yn yr un modd, efallai bod rhai yn amheus am werth cofrestriad, ond mae cofrestriad gyda Chyngor Addysgu Cyffredinol Gogledd Iwerddon yn ofyniad ac mae ein cynnig yn adlewyrchu bodolaeth y gofyniad hwn. Ni fyddai'r cynnig hwn yn atal rhywun sydd wedi hyfforddi yng Ngogledd Iwerddon rhag cael cyfnod ymsefydlu yng Nghymru, ar yr amod ei fod yn bodloni'r gofynion ymsefydlu, sy'n wahanol yma.

3.4.10 Mae'r cynnig yn adlewyrchu gofynion sy'n bodoli yng Ngogledd Iwerddon ac mae'r awdurdodau yno wedi ei groesawu. Mae'n berthnasol i Gymru oherwydd mae'n cynnwys un o'r categorïau o athrawon sy'n cymhwyso yn rhywle arall ac, os dymunant weithio yng Nghymru, rydym yn nodi y byddent yn cael eu cydnabod fel athro yma.

### **Cwestiwn 5: A ydych yn cytuno na ddylem barhau gyda darpariaeth sy'n caniatáu i rai athrawon mewn ysgolion annibynnol neu addysg bellach gael eu cydnabod yn athrawon ar sail cymwysterau a enillwyd cyn 1974, neu 1989 mewn rhai pynciau?**

#### **Pwyntiau a godwyd**

3.5.1 Roedd un ar ddeg o'r pymtheg sefydliad a wnaeth sylwadau ar y cwestiwn yn cytuno â'r cynnig hwn, roedd dau yn ansicr a dau yn anghytuno. Roedd un o'r pedwar ar ddeg o unigolion a atebodd yn cytuno â'r cynnig hwn, roedd tri ar ddeg yn anghytuno ac roedd un yn ansicr.

3.5.2 Nododd Cyngor Addysgu Cyffredinol Cymru ei fod wedi cadarnhau SAC i ddim ond dau athro trwy'r ddarpariaeth hon ers 2003. Oherwydd hynny, credai'r Cyngor fod unigolion o'r fath wedi cael hen ddigon o amser a chyfle i geisio cydnabyddiaeth. Nododd sefydliad arall ei bod yn ymddangos bod hyn yn fater hanesyddol yn bennaf a bod rhesymeg glir dros y newid arfaethedig.

3.5.3 Dywedodd un sefydliad a oedd yn ansicr ei bod yn anodd gwneud sylwadau heb wybod y niferoedd. Credai, os oedd y niferoedd yn fach ac yn lleihau, yna efallai y byddai'n dderbyniol gadael i'r ddarpariaeth ddod i ben. Fodd bynnag, teimlai mewn egwyddor y byddai ymagwedd fwy cyson pe na bai anghysonderau lle gallai athrawon ennill SAC mewn ffyrdd ansafonol. Cydnabu sefydliad arall nad oedd yn sicr fod y nifer sydd wedi defnyddio'r ddarpariaeth hon yn y blynyddoedd diwethaf yn fach ond dywedodd y byddai angen iddo fod yn sicr na fyddai unrhyw anfantais neu wahaniaethu yn digwydd petai'r ddarpariaeth hon yn dod i ben yng Nghymru.

3.5.4 Dywedodd un sefydliad a oedd yn anghytuno fod arnynt eisiau eglurhad pellach ar y pwynt hwn, ynghylch y cymwysterau a'r pynciau, cyn iddynt allu llunio barn oleuedig. Dywedodd y sefydliad arall a oedd yn anghytuno y dylai'r darpariaethau presennol aros fel y maent ar gyfer athrawon addysg bellach.

3.5.5 Gwnaeth yr unigolion nad oedd yn cytuno â'r cynnig nifer o wahanol bwytiau. Dywedodd un unigolyn nad oedd angen newid yn y ddeddfwriaeth gan y byddai'r broblem yn diflannu'n fuan wrth i'r niferoedd leihau.

3.5.6 Awgrymodd un unigolyn fod y cynnig yn ymddangos yn wahaniaethol oherwydd bod athrawon yn symud rhwng y sector annibynnol a sector y wladwriaeth a bod angen yr un sgiliau addysgu. Ychwanegodd un arall ei bod yn debygol bod gan athrawon profiadol o ysgolion annibynnol sgiliau da i'w cynnig i unrhyw ysgol ac y dylai Cymru ganiatáu i ysgolion a gynhelir recriwtio'r athrawon hyn.

3.5.7 Dywedodd tri unigolyn fod y cynnig yn oedraniaethol a gwahaniaethol. Cwestiynodd un o'r rhain a oedd y dyddiadau yn berthnasol a dywedodd un arall na ddylai fod yn fater o bwys pryd roedd pobl wedi hyfforddi.

## **Sut rydym yn bwriadu mynd i'r afael â'r sylwadau hyn**

3.5.8 Mae'r ddarpariaeth bresennol yn caniatáu i rai athrawon mewn ysgolion annibynnol neu addysg bellach a enillodd gymwysterau cyn 1974, neu 1989 mewn rhai pynciau, gymhwyso fel athro. Cyn hynny, daeth y rhai a enillodd gymwysterau addysgu yn athrawon cymwysedig os oedd eu swyddi cyntaf mewn ysgol a gynhelir ond nid os oeddent mewn colegau addysg bellach neu ysgolion annibynnol. Wedyn, roedd ennill SAC yn gysylltiedig â dilyn cyrsiau HCA penodol.

3.5.9 Mae'r ddarpariaeth hon yn berthnasol i'r grŵp hwn yn unig oherwydd na all y mater ond effeithio ar bobl sydd wedi hyfforddi cyn y dyddiadau hyn. Nid yw'n effeithio ar athrawon sy'n gweithio mewn ysgolion annibynnol neu sefydliadau addysg bellach ar hyn o bryd ond sydd â SAC.

3.5.10 Fel y nodwyd yn y ddogfen ymgynghori, mae'r opsiwn hwn ar gael yng Nghymru ers rhyw naw mlynedd ac mae'r nifer sydd wedi manteisio arno yn fach.

Mae Cyngor Addysgu Cyffredinol Cymru wedi cadarnhau mai dim ond dau athro sydd wedi cadarnhau SAC gyda nhw trwy'r ddarpariaeth hon yn ystod y cyfnod hwn.

3.5.11 Cwblhaodd unrhyw un yn y grŵp hwn ei gwrs 23 mlynedd yn ôl (ar gyfer rhai cyrsiau) neu 38 mlynedd yn ôl (ar gyfer rhai eraill). I'r rhai nad ydynt wedi symud i'r sector a gynhelir o'r blaen, rydym yn credu bod hyn yn fwllch rhy hir i ganiatáu iddynt ddechrau addysgu yn y sector a gynhelir heb asesu eu safonau. Mae hyn yn arbennig o bwysig gan fod Cyngor Addysgu Cyffredinol Cymru wedi cyflwyno gofyniad newydd, sef o 1 Medi 2012 ymlaen, y bydd yn rhaid i unrhyw athro cymwysedig sy'n ceisio dychwelyd i'r proffesiwn addysgu yng Nghymru ar ôl seibiant o bum mlynedd neu ragor fodloni meini prawf y Cyngor sef "Dychwelyd i Addysgu".

3.5.12 Yn yr amgylchiadau, nid ydym yn credu ei bod yn hyfyw cadw'r opsiwn ansafonol hwn ar gyfer niferoedd mor fach pan fo ffyrdd eraill ar gael i ennill SAC.

**Gwybodaeth ychwanegol: rydym yn bwriadu darparu mewn diweddariad i ddisodli Rheoliadau 2004 bod y rhai sydd â hawl i ymarfer y proffesiwn o athro ysgol yn y Deyrnas Unedig yn unol â Rhan 2 a Phenodau 1, 2 a 4 yn Rhan 3 Rheoliadau'r Cymunedau Ewropeaidd (Cydnabod Cymwysterau Proffesiynol) 2007 yn athrawon cymwysedig, a bod yn rhaid iddynt dderbyn hysbysiad ysgrifenedig o hyn gan Weinidogion Cymru neu Gyngor Addysgu Cyffredinol Cymru.**

### **Pwyntiau a godwyd**

3.6.1 Cefnogai Cyngor Addysgu Cyffredinol Cymru y cynnig hwn, gan nodi ei fod eisoes yn ymarferol yn gweithredu fel hyn fel rhan o'i swyddogaeth fel 'awdurdod cymwys' o dan Reoliadau 2007. Cefnogai un sefydliad arall y cynnig. Ni dderbyniwyd atebion eraill ar y mater hwn.

### **Sut rydym yn bwriadu mynd i'r afael â'r sylwadau hyn**

3.6.2 Cynigiwn y dylid gweithredu'r newid technegol hwn, a fydd yn adlewyrchu'r arferion presennol.

## **4. Sylwadau cyffredinol nad ydyn nhw'n gysylltiedig yn uniongyrchol â chwestiynau penodol a ofynnwyd**

### **Pwyntiau a godwyd**

4.1 Cododd un sefydliad fater ynghylch Rheoliadau Addysg (Gwaith Penodedig a Chofrestru) (Cymru) 2010, gan ddweud, er bod y rheoliadau hyn yn caniatáu i athrawon addysg bellach cymwysedig gyflwyno cyrsiau galwedigaethol mewn ysgolion a gynhelir, ei fod yn credu y dylid estyn hyn i bynciau academiaidd. Credai y dylid caniatáu i athrawon addysg bellach cymwysedig addysgu mewn ysgolion ar yr un sail ag y caniateir i athrawon sydd wedi hyfforddi dramor wneud.

4.2 Gofynnodd un sefydliad am i ddatganiad yn rhoi asesiad o'r effaith gael ei gynhyrchu. Teimlai hefyd y dylid darparu prawf nad yw'r safonau a'r lefelau ansawdd sy'n ofynnol mewn gwledydd tramor cystal â HCA yng Nghymru neu'r Safonau SAC.

4.3 Nododd un ymateb y dylai fod yn ofynnol i hyfforddeion ddysgu am yr amgylchedd awyr agored yn ogystal â'r amgylchedd dan do a gwneud y defnydd gorau ohono er mwyn cael dysgu effeithiol ar bob lefel o'r Cyfnod Sylfaen tan ddiwedd Cyfnod Allweddol 4.

4.4 Crybwyllodd nifer o atebion faterion cysylltiedig â chau allan, yn eu tyb nhw, athrawon mewn ysgolion annibynnol. Dywedodd un unigolyn ei fod yn anghytuno â'r cynigion oherwydd yn ei dyb ef y byddent yn atal unrhyw athro newydd gymhwyso rhag cael ei gyflogi mewn ysgol annibynnol yng Nghymru os nad oedd yr ysgol yn dilyn y cwricwlwm Cymreig. Dywedodd unigolyn arall nad oedd yn ddoeth cau allan athrawon oherwydd nad oedd yr ysgol lle roeddent yn gweithio yn dilyn y cwricwlwm Cymreig gan na fyddai hyn yn annog athrawon dawnus ac awgrymodd nad oedd Cymraeg a'r cwricwlwm Cymreig yn berthnasol mewn ysgolion oedd â disgyblion o wledydd eraill. Dywedodd unigolyn arall nad oedd angen i athrawon newydd gymhwyso gwblhau cyfnod ymsefydlu mewn ysgol yng Nghymru lle roedd y Gymraeg yn orfodol a gallai hyn beri i athrawon adael Cymru i fynd i Loegr. Dywedodd un arall fod athrawon mewn ysgolion annibynnol neu addysg bellach yn cael eu cau allan o'r rheoliadau newydd a bod y cynigion yn wahaniaethol.

4.5 Cododd dau unigolyn fater athrawon mewn ysgol annibynnol a ddilynodd hyfforddiant ar y Rhaglen Athrawon Graddedig er mwyn ennill SAC, ond na allai gwblhau cyfnod ymsefydlu yn yr ysgol gan nad oedd Cymraeg yn orfodol ynddi. Dywedodd un na fyddai Cymraeg gorfodol o fawr o werth i'r llu o ddisgyblion rhyngwladol a bod peidio â chaniatáu i'r athrawon hyn gwblhau eu blwyddyn ymsefydlu yn anonest i bob pwrpas ar ôl i Lywodraeth Cymru gymeradwyo'r lle ar y Rhaglen Athrawon Graddedig. Gwnaeth y llall bwyntiau tebyg, gan ychwanegu bod y rheoliadau wedi newid ers i'r lle ar y Rhaglen Athrawon Graddedig gael ei gymeradwyo a dyna oedd y rheswm pam nad oedd yn gallu cael ei gyfnod ymsefydlu yn yr ysgol.

## **Sut rydym yn bwriadu mynd i'r afael â'r sylwadau hyn**

4.6 Nid yw'r ymgynghoriad presennol yn cynnwys Rheoliadau Addysg (Gwaith Penodedig a Chofrestru) (Cymru) 2010. Mewn perthynas â chydabyddiaeth fel athro cymwysedig nid ydym yn cynnig y dylid cydnabod athrawon sydd wedi hyfforddi dramor neu athrawon addysg bellach cymwysedig fel hyn. Trafodwyd sefyllfa athrawon sydd wedi hyfforddi dramor ym mharagraffau 3.2.14-3.2.15 a thrafodwyd materion ynghylch beth mae athrawon addysg bellach cymwysedig yn cael ei wneud ar hyn o bryd mewn ysgolion a gynhelir yng Nghymru ym mharagraffau 3.2.9-3.2.10.

4.7 Bwriadwn gyhoeddi datganiad yn rhoi asesiad o'r effaith. Trafodwyd mater gwledydd tramor mewn perthynas â HCA a'r Safonau SAC ym mharagraffau 3.2.14-3.2.15.

4.8 Byddai'r Safonau SAC yn cynnwys materion ynghylch beth y gellid disgwyl i hyfforddeion ei astudio ar gyrsiau HCA ond nid yw'r ymgynghoriad presennol yn ymdrin â hyn. Mae'r Cyfnod Sylfaen eisoes yn pwysleisio pwysigrwydd defnyddio'r awyr agored fel amgylchedd dysgu ychwanegol lle y gall plant weithio bob dydd. Mae'r Safonau SAC presennol yn ei gwneud yn ofynnol i hyfforddeion allu cynllunio cyfleoedd i'w disgyblion ddysgu mewn cyd-destunau tu allan i'r ysgol, megis gwaith maes.

4.9 Roedd yn ymddangos bod yr atebion gan unigolion yn seiliedig ar gamddealltwriaeth. Mae'r rheoliadau sy'n destun ymgynghoriad yn ymwneud â chydabod pobl fel athrawon cymwysedig a dim byd arall. Nid ydynt yn gosod unrhyw ofynion mewn perthynas â chyfnod ymsefydlu athrawon newydd gymhwyso: daw'r mater hwnnw dan Reoliadau Addysg (Trefniadau Ymsefydlu ar gyfer Athrawon Ysgol) (Cymru) 2005. Fel y nodwyd ym mharagraff 3.1.7, mae'r ddarpariaeth sy'n destun ymgynghoriad mewn perthynas â'r angen i'r cyfnod o brofiad addysgu ymarferol ar gyrsiau HCA gael ei gynnal yn gyfan gwbl neu'n bennaf mewn ysgol neu sefydliad addysgol arall yng Nghymru sy'n bodloni gofynion y cwricwlwm cenedlaethol, yn berthnasol i gyrsiau sy'n cael eu rhedeg trwy sefydliadau addysg uwch yn unig. Mae'r cynnig i ddileu'r ddarpariaeth bresennol sy'n caniatáu i rai athrawon mewn ysgolion annibynnol neu addysg bellach ac a enillodd gymwysterau cyn 1974, neu 1989 mewn rhai pynciau, gael statws cymwysedig yn sôn am lwybr cymhwyso a ddefnyddiwyd gan ddim ond dau athro ers 2003.

4.10 Mewn perthynas â'r Rhaglen Athrawon Graddedig, nid yw'r rheoliadau sy'n destun ymgynghoriad yn ymwneud â rhaglenni fel hon sy'n seiliedig ar gyflogaeth. Mae'r ddarpariaeth ynghylch gofynion cwricwlaidd lle mae pobl yn gweithio cyfnod ymsefydlu mewn ysgol annibynnol i'w gweld yn Rheoliadau Addysg (Trefniadau Ymsefydlu ar gyfer Athrawon Ysgol) (Cymru) 2005. Mae'r darpariaethau hyn yn bodoli ers 2005 ac nid ydynt wedi newid; yn yr achosion y cyfeiriwyd atynt, newidiodd yr ysgol dan sylw ei gofynion cwricwlaidd ar ôl i'r llefydd ar y Rhaglen Athrawon Graddedig wedi cael eu cytuno.

## **5. Y ffordd ymlaen**

5.1 Ar ôl ystyried yn llawn yr ymatebion a dderbyniwyd yn ystod yr ymgynghoriad, mae'r Gweinidog Addysg a Sgiliau wedi penderfynu diweddarau'r rheoliadau ar gyfer cymwysterau athrawon gyda'r newidiadau a nodwyd yn y ddogfen ymgynghori a'r nodyn gwybodaeth ychwanegol.

5.2 Bwriedir i'r rheoliadau newydd ddod i rym o 1 Ebrill 2012 ymlaen.

## **Atodiad A: Rhestr o ymatebwyr**

### **Sefydliadau**

Adran Addysg Gogledd Iwerddon  
Cymdeithas Arweinwyr Ysgolion a Cholegau Cymru  
Cymdeithas Athrawon a Darlithwyr  
Cymdeithas Genedlaethol y Prifathrawon, Cymru  
Cymdeithas Genedlaethol yr Ysgolfeistri ac Undeb yr Athrawesau, Cymru  
Cyngor Addysgu Cyffredinol Cymru (CynACC)  
Cyngor Addysgu Cyffredinol Gogledd Iwerddon  
Cyngor Addysgu Cyffredinol yr Alban  
Cyngor Bwrdeistref Sirol Caerffili  
Estyn  
Undeb Cenedlaethol Athrawon Cymru (UCAC)  
Undeb Cenedlaethol yr Athrawon, Cymru  
Undeb Prifysgol a Choleg Cymru  
Ysgol y Gadeirlan, Caerdydd

Cafwyd dau ymateb hefyd gan sefydliadau na ddymunai gael eu henwi.

### **Unigolion**

Bathie, A P – Ysgol Annibynnol Rydal Penrhos, Bae Colwyn  
Baxter, Phil – Ysgol Annibynnol Rydal Penrhos, Bae Colwyn  
Bennett, Mathew – Ysgol Annibynnol Rydal Penrhos, Bae Colwyn  
Proudlove, Ben – Ysgol Annibynnol Rydal Penrhos, Bae Colwyn  
Proudlove, Christopher  
Proudlove, Irene – Ysgol Annibynnol Rydal Penrhos, Bae Colwyn

Cafwyd wyth ymateb hefyd gan unigolion na ddymunai gael eu henwi.

## Atodiad B: Atebion cyhoeddiedig

1 – Mathew Bennett – Rydal Penrhos

Page used to send this email:	/consultations/forms/qualregulations112/
Name:	Matthew Bennett
Organisation:	Rydal Penrhos School
Address:	Pwllcrochan Avenue, Colwyn Bay, Conwy
Postcode:	LL29 7BY
e-mail:	<a href="mailto:mbennett@rydal-penrhos.com">mbennett@rydal-penrhos.com</a>
Telephone number:	
Q1:	Disagree
Comments:	The school should meet the majority of the national curriculum requirements; should it not however, is not a definitive position on which to judge the ability of the the trainee to teach the curriculum and beyond.
Q2:	Disagree
Comments:	This would limit the transfer of skills between institutions, particularly those in close proximity to the border and thus limit the sharing of best practice. Furthermore I think it would be found to be discriminatory in respect of European employment legislation.
Q3:	Disagree
Comments:	If they have obtained QTS within the UK then they should be free to apply for positions without discrimination. They will only get the position if it is determined that they are the best candidate by the interviewing board, and not on the origin of their QTS.
Q4:	Not sure
Comments:	If the standards for recognition in Northern Ireland are commensurable with the rest of the UK then those skills should be recognised within the UK.

Q5:	Disagree
Comments:	As teachers can and do pass between the independent and state sector it would appear discriminatory to act in such a manner. The fundamental skills required to teach do not change due to the sector in which they are applied.
Comments: (Q6)	
Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous (not to say that it came from you) please tick the box:	(Unchecked)

2 – Anonymous

Page used to send this email:	/consultations/forms/qualregulations112/
Name:	Name and address supplied
Organisation:	
Address:	
Postcode:	
e-mail:	
Telephone number:	
Q1:	Disagree
Comments:	Valuable teaching experience is not only gleaned in a school which happens to deliver Welsh study up to the age of 16. Furthermore, Welsh culture and ones place in this nation can be taught and reinforced without recourse to compulsory language teaching inappropriate to the intake of some establishments.
Q2:	Disagree
Comments:	A unified British approach is surely more appropriate in encouraging good teachers to move freely between the nations of the UK.
Q3:	Disagree
Comments:	
Q4:	Disagree
Comments:	
Q5:	Disagree
Comments:	Legislation is not needed when the 'problem' (if it is one) will disappear soon.

Comments: Q6	
Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous (not to say that it came from you) please tick the box:	(Checked)

### 3 – Anonymous

Page used to send this email:	/consultations/forms/qualregulations112/
Name:	Name and address supplied
Organisation:	
Address:	
Postcode:	
e-mail:	
Telephone number:	
Q1:	Disagree
Comments:	Would regard this as highly discriminatory. The Welsh Curriculum is similar to the English Curriculum and I can see no reason to differentiate between them.
Q2:	Disagree
Comments:	
Q3:	Disagree
Comments:	Teaching qualifications tend to be similar in most countries; would seem a shame to discriminate in this way.
Q4:	Not sure
Comments:	
Q5:	Disagree
Comments:	
Comments: Q6	
Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous (not to say that it came from you) please tick the box:	(Checked)

4 – Irene Proudlove – Rydal Penrhos

Page used to send this email:	/consultations/forms/qualregulations112/
Name:	Mrs Irene May Proudlove
Organisation:	Rydal Penrhos Senior School
Address:	Pwylcrochan Avenue Colwyn Bay North Wales
Postcode:	LL29 7BT
e-mail:	<a href="mailto:improudlove@rydal-penrhos.com">improudlove@rydal-penrhos.com</a>
Telephone number:	01492530155
Q1:	Disagree
Comments:	Not all schools in Wales can compulsorily teach Welsh to all students – there are schools (which bring money into Wales) in which many of the students are international – enforced Welsh would be inappropriate for these pupils. Having gained QTS in a school in Wales it MUST be possible for a teacher to complete their 'Newly Qualified Teacher' induction. To not allow this is discriminatory.
Q2:	Disagree
Comments:	Welsh qualified teachers can teach in England so why not the other way round? This is against internationalism and an incredibly outdated way of thinking about the world especially the UK. It seems to me it is another example of discrimination which should be outlawed!
Q3:	Disagree
Comments:	Re-location is essential in this day and age and an important part of the global economy. What is important is that the best teachers are employed in any school.....not where they did their training. These countries are part of the UNITED Kingdom. Suggestions such as above puts Wales back into the Dark Ages.
Q4:	Not sure
Comments:	What has this got to do with Wales? There is a mistake in this question. See response to Question 3.

Q5:	Disagree
Comments:	Why? What have these dates got to do with anything? There is the possibility that some of this is ageist and again discriminatory.
Comments: Q6	<p>In my school there are three colleagues (good teachers all) who did GTPs here last year (2011-2012). This GTP was paid for by the school at considerable cost, supervised by a respected Welsh university (Bangor) and, more importantly approved by the Welsh Assembly. These teachers are now being prevented from undertaking their NQT year because this school does not have compulsory Welsh as it is an independent, international school with a very large German and Chinese intake to whom Welsh would be of little value when they return to their own countries. We do have some children whose first language is Welsh and they are actively encouraged to continue Welsh, including taking GCSE and A level courses. Some first language English students also join them when they show interest and aptitude for language acquisition. Not allowing these teachers to complete the NQT year is tantamount to dishonesty when the Welsh Assembly approved their GTP in the first place. It is only right that teachers who have had a GTP year funded by a school, honour that by continuing to work at the school and continue the relationships they have already created with the pupils. Nothing but a major reverse of these proposals will force young, enthusiastic, less expensive teachers out of many Welsh schools and prevent independent schools from employing any NQT. Again, totally discriminatory, which is inappropriate in the 21st century and surely likely to make Wales a 'laughing stock' across Europe if not the world.</p>
Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous (not to say that it came from you) please tick the box:	(Unchecked)

5 – Anonymous

Page used to send this email:	/consultations/forms/qualregulations112/
Name:	E-mail address supplied
Organisation:	
Address:	
Postcode:	
e-mail:	
Telephone number:	
Q1:	Disagree
Comments:	
Q2:	Disagree
Comments:	
Q3:	Disagree
Comments:	
Q4:	Disagree
Comments:	
Q5:	Disagree
Comments:	
Comments: Q6	
Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous (not to say that it came from you) please tick the box:	(Checked)

6 – Anonymous

Page used to send this email:	/consultations/forms/qualregulations112/
Name:	E-mail address supplied
Organisation:	
Address:	
Postcode:	
e-mail:	
Telephone number:	
Q1:	Disagree
Comments:	
Q2:	Disagree
Comments:	
Q3:	Disagree
Comments:	
Q4:	Disagree
Comments:	
Q5:	Disagree
Comments:	
Comments: Q6	
Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous (not to say that it came from you) please tick the box:	(Checked)

7 – Phil Baxter – Rydal Penrhos

Page used to send this email:	/consultations/forms/qualregulations112/
Name:	Phill Baxter
Organisation:	Rydal Penrhos Senior School
Address:	Pwlycrochan Avenue Colwyn Bay CONWY
Postcode:	LL29 5BT
e-mail:	<a href="mailto:pbaxter@rydal-penrhos.com">pbaxter@rydal-penrhos.com</a>
Telephone number:	
Q1:	Disagree
Comments:	
Q2:	Disagree
Comments:	
Q3:	Disagree
Comments:	
Q4:	Disagree
Comments:	
Q5:	Disagree
Comments:	
Comments: Q6	
Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous (not to say that it came from you) please tick the box:	(Unchecked)

8 – Anonymous

Page used to send this email:	/consultations/forms/qualregulations112/
Name:	Name and address supplied
Organisation:	
Address:	
Postcode:	
e-mail:	
Telephone number:	
Q1:	Disagree
Comments:	An individual can become a fantastic teacher regardless if they follow national curriculum orders, yes it is important as part of their training that they are made fully aware of them, but not crucial that they train in institutions that follow them to the letter.
Q2:	Not sure
Comments:	Question is not very clear in terms of the proposal.
Q3:	Disagree
Comments:	If these persons have experience in teaching in other countries, I do not see the issue. You could end up turning away a very talented teacher because they did not train here. But issue QTS to a native who is only capable of delivering substandard lessons. Surely we want the best possible teachers educating our children.
Q4:	Agree
Comments:	
Q5:	Not sure
Comments:	

Comments: Q6	
Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous (not to say that it came from you) please tick the box:	(Checked)

9 – Anonymous

Page used to send this email:	/consultations/forms/qualregulations112/
Name:	Name and address supplied
Organisation:	
Address:	
Postcode:	
e-mail:	
Telephone number:	
Q1:	Disagree
Comments:	
Q2:	Disagree
Comments:	
Q3:	Disagree
Comments:	
Q4:	Not sure
Comments:	
Q5:	Disagree
Comments: Q6	
Comments:	I personally think that the proposed changes are ludicrous, as they would prevent any Newly Qualified Teacher from ever being employed in an independent school in Wales, if the school does not follow the Welsh Curriculum. The country would lose hundreds of exceptional teachers every year purely due to a red-tape measure. This must be changed immediately!
Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous (not to say that it came from you) please tick the box:	(Checked)

10 – AP Bathie – Rydal Penrhos

Page used to send this email:	/consultations/forms/qualregulations112/
Name:	Mr. AP Bathie
Organisation:	Rydal Penrhos School
Address:	Colwyn Bay Conwy
Postcode:	LL29 7BT
e-mail:	<a href="mailto:apbathie@rydal-penrhos.com">apbathie@rydal-penrhos.com</a>
Telephone number:	01492530155
Q1:	Disagree
Comments:	In your proposals you are excluding young teachers from qualifying if they happen to work in a private school in Wales. Under past legislation these schools can follow their own curriculum and are both successful and generate significant inward investment into Wales. In my opinion it is discriminatory to exclude them from qualification as they are becoming teachers in Wales which is a transferrable skill. We live in a global economy and transferrable skills are essential if Wales is to compete with the rest of the World.
Q2:	Disagree
Comments:	Why limit inward movement of talent by narrow rules. Wales cannot compete globally if it continually looks inwards.
Q3:	Disagree
Comments:	Again you are limiting inward movement of talent. A teacher could have trained in Scotland and then worked as an excellent teacher in eg. Australia to be then excluded from working in Wales. A paper qualification means one thing- a collection of positive refs. for an individual means something much better.
Q4:	Disagree
Comments:	The general teaching councils have failed. Do we need them as they offer little and cost a lot.

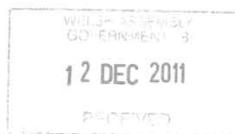
Q5:	Disagree
Comments:	<p>This is madness as independent schools are, in general, likely to score highly when Estyn inspected. Therefore any experienced teacher from those schools is likely to have real skills to offer in any school. With the pension changes coming in Wales is going to have to recruit talent from as broad a base as it can.</p>
Comments: Q6	<p>Wales is a proud but small country. To compete globally we should be encouraging talent from all areas, both internal and overseas. Therefore, to deliberately exclude teachers because the school they work in does not follow a prescribed and narrow curriculum is lunacy. The school I work in has children from all over the world. Many follow the International baccalaureate curriculum which has a worldwide reputation, whereas the welsh curriculum is unknown outside of the Country. Whilst Welsh is taught in school to those who wish to study it, it has no relevance to children from Lithuania or China. For Wales to succeed it needs to look outwards rather than the politically correct 'Wales for the Welsh'.</p>
<p>Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous (not to say that it came from you) please tick the box:</p>	<p>(Unchecked)</p>

11 – Anonymous

Page used to send this email:	/consultations/forms/qualregulations112/
Name:	Name and address supplied
Organisation:	
Address:	
Postcode:	
e-mail:	
Telephone number:	
Q1:	Disagree
Comments:	I have mentored many very capable and potentially excellent PGCE students, who have a joint main method in Outdoor Education. North Wales is a key area for teaching Outdoor Education within schools and it is mainly Independent schools that teach Outdoor Education as part of the Curriculum. These individuals once qualified would be a major asset to any school in Wales and help to development this type of education with in NC schools, but under the curent proposal, would find it difficult to complete their training without the use of Independent schools.
Q2:	Not sure
Comments:	I think a long as the teacher is a qualified it seems very short sighted to prevent good teachers from teaching in wales, because they don't fit the traditional criteria, there should be flexibility in any system.
Q3:	Not sure
Comments:	I can see the point of the proposal but there should again be flexibility, e.g if they trained in Scotland or Northern Ireland and completed Teacher training there. They should not have to do a further 60hrs. It may be they get married for example and have to move for their spouse's job.
Q4:	Not sure
Comments:	

Q5:	Disagree
Comments:	
Comments: Q6	I do not think it necessary that NQT's can only gain full status if they have completed their NQT in a Welsh school where Welsh is compulsory. Outdoor Education teachers are a key example they would most likely leave Wales and head for England, so they could complete their NQT in a school that teachers Outdoor Education, alongside their other main subject e.g.Science. It would then be very difficult to get these often excellent, motivated and enthusiastic teachers back.
Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous (not to say that it came from you) please tick the box:	(Checked)

## 12 – Stephen Morris – headmaster Cathedral School, Cardiff



Ms G Deane  
Learning Improvement and Professional Development Division  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

6 December 2011

Dear Ms Deane,

### UPDATED QUALIFICATIONS FOR SCHOOL TEACHERS IN WALES

I am responding on behalf of the Cathedral School, Llandaff, Cardiff, to the consultation on the above.

We are a high achieving independent school educating 650 pupils aged 3-16. As Head I am deeply concerned at the apparent new 'rule' that teachers can only complete their NQT year in a school which teaches the Foundation Phase and National Curriculum (which in Wales includes the teaching of Welsh at all key stages). The nature of an independent school is that it is independent, free within the parameters of the Regulations to set its own curriculum. Schools such as ours are the highest performing schools in Wales academically, and eager to attract and train bright young teachers who we might encourage to further their careers in the state sector. Equally we would wish to attract the best young talent from England, in the knowledge that they can complete the formalities of the NQT year whilst working in Wales. Interchangeability between independent and state sectors is in everyone's best interests, not least those of the state sector. Similarly, the recruitment of talented people from England into Welsh education for a period of time as part of their career is in everyone's best interests, avoiding stagnancy of localism and parochialism within the Welsh teaching profession.

I urge a rethink on this point in the strongest possible terms; allowing independent schools to exercise their independence in this way would be a great benefit to Wales as a whole, and the Independent Schools Teacher Induction Programme is a properly professional, rigorous programme accepted by OFSTED and which has been hitherto accepted in Wales, with the benefits I outline above.

Yours sincerely,

Stephen Morris  
Headmaster

The Cathedral School ♦ Cardiff Road ♦ Llandaff ♦ Cardiff ♦ CF5 2YH

enquiries@cathedral-school.co.uk  
www.cathedral-school.co.uk  
Tel 029 2056 3179  
Fax 029 2056 7752



The Cathedral School (Llandaff) Ltd  
A Woodard Corporation School  
Company No. 5091977  
Charity No. 1103522

13 – Ben Proudlove – Rydal Penrhos

Page used to send this email:	/consultations/forms/qualregulations112/
Name:	Ben Proudlove
Organisation:	Rydal Penrhos Senior School
Address:	Rydal Penrhos School Pwllcrochan Avenue Colwyn Bay Conwy
Postcode:	LL29 7BT
e-mail:	<a href="mailto:BJProudlove@Rydal-Penrhos.com">BJProudlove@Rydal-Penrhos.com</a>
Telephone number:	07709344112
Q1:	Disagree
Comments:	<p>Not at all. It is absolutely impossible to use the same regulations across all schools in Wales. Rydal Penrhos is both an IB (and A-Level) school which has a large international student population from all over the world - Chinese, German, Russian and French pupil body particularly, who are educated in the UK and then return to their home countries for University. What use would learning Welsh be to these pupils? We teach Welsh history and culture, which the pupils enjoy, but to completely follow the curriculum it would be compulsory to teach Welsh language also – largely useless to a large proportion of our community when they return to their home countries for University. By enforcing a Welsh curriculum, international students will not be attracted to the school and numbers here will drop, as they would in all independent schools. As a result money will no longer be brought into the local economy. Times are hard enough in the independent sector without taking action which will affect numbers here. By enforcing a Welsh curriculum, NQTs will not be able to complete their induction year in independent schools of our nature and so independent schools will not be able to employ young, enthusiastic teachers. This also seems completely against EU regulations regarding employment law. Why is Wales determined to separate itself from the rest of the UNITED Kingdom and Europe? It is discriminatory and completely biased towards Welsh people.</p>

Q2:	Disagree
Comments:	What difference does it make WHERE a teacher trained in the UNITED Kingdom? Surely the important issue is that the very best teachers are chosen for employment not where they trained. We are all British citizens! A teacher who was trained in England is just as capable of teaching in Wales as a Welsh teacher is, and vice versa.
Q3:	Disagree
Comments:	See above! Absolutely not! Why is the Welsh Assembly determined to seperate itself from the rest of the UK? Are you suggesting that teacher training is not as effective in Scotland or Northern Ireland? Are you suggesting that in some way Welsh teacher training makes a person a better/superior teacher? This is completely discriminatory! Absolutely appalling.
Q4:	Disagree
Comments:	See previous responses. Absolutely not. Northern Ireland is part of the UNITED Kingdom! If a teacher trained there, they should be allowed to be inducted anywhere in the UNITED Kingdom!
Q5:	Disagree
Comments:	Not only are you now discriminating against the nationality of people, but now also against the age of people! Many of the teachers at this school qualified before 1974 and they are exceptionally good at what they do! Why does it matter when they trained? This is a disgraceful suggestion.
Comments: Q6	I am aged 27 and I am a teacher in my second year at Rydal Penrhos School in Colwyn Bay. I am a double undergraduate student from both Liverpool University; I studied International Development, and Liverpool John Moores University (LJMU), where I was awarded a first class honours degree in Outdoor Education with Physical Education. Having completed my first degree, I decided that my future lay in teaching, so I took the bold decision to go back to university to train further, accepting the inevitable financial and emotional implications this involved. I worked part-time to support myself, whilst studying full-time. During the summer holidays of my final year, I volunteered at Rydal Penrhos and ultimately, I applied for a place, and was accepted on the highly competitive Post Graduate Certificate of Education (PGCE) course in Physical

Education at LJMU. However, after completing my second degree, I was contacted by the Headmaster at Rydal Penrhos, Mr Patrick Lee-Browne, who offered me a full-time position as a teacher of Geography, Physical Education and Outdoor Education on the Graduate Teacher Programme (GTP). The GTP (a work-based route to achieving Qualified Teacher Status) WAS APPROVED BY THE WELSH ASSEMBLY and funded by school. I felt completely obliged to continue to work for the school after gaining QTS after the end of the year, given they had invested substantially in me. I also wished to continue working with the young people I had developed working relationships with. This academic year I have been appointed Head of Outdoor Education at the school as a result of my hard work in this area. I have organised a full programme of OE for the entire school, organised an expedition to Borneo and gained 85% participation in Year 9 to complete the Bronze Award of D of E. I am completely and utterly devastated to regulations have been 'tightened up' THIS ACADEMIC YEAR and I am now not eligible to validate my qualification. After six hard years at university and a further year meeting the GTP requirements placed on me by Bangor University, over and above my responsibilities to my employer, I feel absolutely demoralised and discriminated against. Teachers were able to validate their qualifications at this school last year, yet I am not. I now find myself in an impossible position and I know I am not alone - there are three other young teachers also affected by this change in the rules at Rydal Penrhos School alone. Apart from University years, I have lived in Wales my entire life, yet I feel absolutely disgraced by some of the proposals in this document. I will leave Wales after this academic year if I cannot honour the school who invested in me. Excellent teachers at this school in the same position as myself, will ALL do the same. Why is the Welsh Assembly forcing people out and not doing what it can to support young teachers and allow us to finish the qualification that we worked EXCEPTIONALLY hard to gain? I have worked so hard to get where I am today - I just want to finish what I started. Please do not prevent school like ours from being able to employ young, dynamic and enthusiastic teachers, who work tirelessly to offer so much to young people.

<p>Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous (not to say that it came from you) please tick the box:</p>	<p>(Unchecked)</p>
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No 14 – Anonymous

Page used to send this email:	/consultations/forms/qualregulations112/
Name:	
Organisation:	Name and e-mail address supplied
Address:	
Postcode:	
e-mail:	
Telephone number:	
Q1:	Disagree
Comments:	
Q2:	Disagree
Comments:	
Q3:	Disagree
Comments:	
Q4:	Disagree
Comments:	
Q5:	Disagree
Comments:	
Comments: Q6	
Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous (not to say that it came from you) please tick the box:	(Checked)

## Updated qualifications regulations for school teachers in Wales

### Consultation Response Form

Your name: Name and address supplied

Organisation (if applicable): e

Your address:

Responses should be returned by **30 January 2012** to:

Gail Deane  
Learning Improvement and Professional Development Division  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

or completed electronically and sent to:

[teachersqualconsultation@wales.gsi.gov.uk](mailto:teachersqualconsultation@wales.gsi.gov.uk)

1. We are proposing to require that the period of practical teaching experience for those qualifying as a teacher on initial teacher training courses in Wales would need to be undertaken wholly or mainly in a school or other educational institution (except a pupil referral unit) in Wales which has met the national curriculum requirements. Do you agree with this?

**Note:** This would not mean that the entire period of practical teaching experience had to be in schools or other educational institutions which met the national curriculum requirements, as it is recognised that this would not necessarily be required for all training designed to enable trainee teachers to demonstrate that they have met the Qualified Teacher Status Standards. The requirement would be that, for the overall total period of practical teaching experience, the majority would have had to have been in schools or other educational institutions (except for pupil referral units) which met the national curriculum requirements.

<b>Agree</b>	√ <input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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<b>Comments:</b>
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2. We want to replace the provision in the Education (School Teachers' Qualifications) (Wales) Regulations 2004 which recognises as a qualified teacher in Wales any persons who are qualified teachers by virtue of regulations made in relation to England with a more specific provision which only covers certain categories of persons qualifying in England.

This replacement provision would cover persons qualifying as a teacher in England through:

- (iv) an initial teacher training course at an accredited institution there;
- (v) assessment against the specified standards there, but without having undertaken a specific initial teacher training course (known as the Assessment Only route);
- (vi) successful completion of a period of training on an employment-based teacher training scheme in England.

Do you agree with this?

<b>Agree</b>	√ <input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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<b>Comments:</b>
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3. We want to prevent someone who may have gained recognition as a teacher in Scotland or Northern Ireland without having taught in those countries from being able to be qualified as a teacher in Wales. We propose to have an effective requirement of having to have worked 60 days in an educational institution in those countries. Do you agree with this?

**Note:** The 60-day period is not intended to provide a demonstration of proficiency for teaching purposes in schools in Wales, but to prevent overseas-trained teachers with no teaching experience in Britain from gaining Qualified Teacher Status by registering in Scotland or Northern Ireland.

<b>Agree</b>	<input checked="" type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Comments:**

4. Do you agree that for those who could be qualified teachers by virtue of their recognition as teachers in schools in Northern Ireland, we should now refer to registration with the General Teaching Council for Northern Ireland?

<b>Agree</b>	<input checked="" type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Comments:**

5. Do you agree that we should not continue with a provision allowing qualification as a teacher by certain independent school or further education teachers on the basis of qualifications gained before 1974, or 1989 in certain subjects?

<b>Agree</b>	<input checked="" type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Comments:**

6. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

**Comments: There should be a requirement for trainees to learn about and make the most of the outdoor as well as the indoor environment for effective learning at all levels from the Foundation Phase through to, and including, Key Stage 4**

Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept confidential, please tick here:

## Updated qualifications regulations for school teachers in Wales

### Consultation Response Form

Your name: Owen Hathway

Organisation (if applicable): NUT Cymru

e-mail/telephone number: 07921146442 /  
[o.hathway@nut.org.uk](mailto:o.hathway@nut.org.uk)

Your address: NUT Cymru, Ty Sinnott, 18 Neptune  
Court, Vanguard Way, Cardiff, CF24 5PJ

Responses should be returned by **30 January 2012** to:

Gail Deane  
Learning Improvement and Professional Development Division  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

or completed electronically and sent to:

[teachersqualconsultation@wales.gsi.gov.uk](mailto:teachersqualconsultation@wales.gsi.gov.uk)

1. We are proposing to require that the period of practical teaching experience for those qualifying as a teacher on initial teacher training courses in Wales would need to be undertaken wholly or mainly in a school or other educational institution (except a pupil referral unit) in Wales which has met the national curriculum requirements. Do you agree with this?

**Note:** This would not mean that the entire period of practical teaching experience had to be in schools or other educational institutions which met the national curriculum requirements, as it is recognised that this would not necessarily be required for all training designed to enable trainee teachers to demonstrate that they have met the Qualified Teacher Status Standards. The requirement would be that, for the overall total period of practical teaching experience, the majority would have had to have been in schools or other educational institutions (except for pupil referral units) which met the national curriculum requirements.

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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**Comments:**

**The proposal to require teacher training to be undertaken wholly or mainly in a school or other educational institution is acceptable. However it is important that there is no confusion relating to what ‘mainly’ consists of. It would be important to define what percentage of time spent ‘mainly’ in a school or other educational institution constitutes.**

2. We want to replace the provision in the Education (School Teachers' Qualifications) (Wales) Regulations 2004 which recognises as a qualified teacher in Wales any persons who are qualified teachers by virtue of regulations made in relation to England with a more specific provision which only covers certain categories of persons qualifying in England.

This replacement provision would cover persons qualifying as a teacher in England through:

- (vii) an initial teacher training course at an accredited institution there;
- (viii) assessment against the specified standards there, but without having undertaken a specific initial teacher training course (known as the Assessment Only route);
- (ix) successful completion of a period of training on an employment-based teacher training scheme in England.

Do you agree with this?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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**Comments:**

**It is not entirely clear what is being proposed for teachers with Further Education qualifications. While many would argue that it would be fairer for Further Education qualifications to be given parity, as the workforce in the secondary sector is still contracting, it could increase the competition for jobs to the detriment of QTS teachers. On that basis, the proposals outlined above would be supported.**

**The anomaly with vocational courses taught, in relation to qualified further education teachers being able to teach in schools, the vocational courses that they already teach in further education institutions, does need to be examined. The exemptions given under the Education (Specified Work and Registration) (Wales) Regulations 2010 need to be clear to ensure there is no cross over and there is a definitive distinction between those qualified further education teachers that can teach in schools in an unrestricted way, and those that cannot.**

3. We want to prevent someone who may have gained recognition as a teacher in Scotland or Northern Ireland without having taught in those countries from being able to be qualified as a teacher in Wales. We propose to have an effective requirement of having to have worked 60 days in an educational institution in those countries. Do you agree with this?

**Note:** The 60-day period is not intended to provide a demonstration of proficiency for teaching purposes in schools in Wales, but to prevent overseas-trained teachers with no teaching experience in Britain from gaining Qualified Teacher Status by registering in Scotland or Northern Ireland.

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<b>X</b>
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**Comments:**

**This proposal appears acceptable. The NUT has always supported schools having qualified teachers. Ensuring that there is an obligation for teachers to undertake a mandatory period of teaching in a classroom to attain qualification would seem reasonable.**

**The distinction made in the note that the 60-day period is not intended to provide a demonstration of proficiency for teaching purposes in schools in Wales, but to prevent overseas-trained teachers with no teaching experience in Britain from gaining Qualified Teacher Status by registering in Scotland or Northern Ireland, is an important one. It is necessary that teachers that come to Wales from overseas are aware of the mandatory requirements on them to gain QTS depending on what part of the UK they first enter the profession.**

**However, where teachers are qualified entering the UK, but without specific qualifications gained from within the UK, a reasonable evaluation should be given into further requirements needed. The NUT believes that arrangements in a number of Commonwealth countries in particular are similar enough to those in Wales and the UK. The NUT would support proposals that fully qualified teachers from a number of other countries and regions, should be able to teach in schools as qualified teachers without undertaking further training or assessment.**

4. Do you agree that for those who could be qualified teachers by virtue of their recognition as teachers in schools in Northern Ireland, we should now refer to registration with the General Teaching Council for Northern Ireland?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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**Comments:**

**In principle this approach appears a reasonable way forward. Where we have doubts they are centred on the future of the GTCNI, in light of the Westminster government's decision to abolish the GTCE. So long as the GTCNI exists, and is operating to current standards, this proposal appears to make sense in streamlining the process and allowing a level of confidence in qualification status of teachers. However, if as a result of the decision to abolish the GTCE and proposals are made to change the remit of the GTCNI, these proposals will be under question.**

5. Do you agree that we should not continue with a provision allowing qualification as a teacher by certain independent school or further education teachers on the basis of qualifications gained before 1974, or 1989 in certain subjects?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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**Comments:**

**Without knowing the exact take up, or if the number of individuals who have taken advantage of the provision is increasing or decreasing, it is difficult to judge the importance of continuing with this practice.**

**If the take up is small and decreasing, with fewer and fewer individuals being able to take up the provision, as a result of the smaller pool of people that could apply under the regulations given the timescales, then it could be acceptable to allow it to continue until a natural conclusion.**

**However, in principle, it would make for a more consistent approach if there were no anomalies in which teachers could achieve QTS beyond standard methods.**

6. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

**Comments:**

Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept confidential, please tick here:

## Updated qualifications regulations for school teachers in Wales

### Consultation Response Form

Your name: Tom Hamilton

Organisation (if applicable): General Teaching Council for Scotland

e-mail/telephone number: [tom.hamilton@gtcs.org.uk](mailto:tom.hamilton@gtcs.org.uk)

Your address: Clerwood House, 96 Clermiston Road, Edinburgh EH12 6UT

Responses should be returned by **30 January 2012** to:

Gail Deane  
Learning Improvement and Professional Development Division  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

or completed electronically and sent to:

[teachersqualconsultation@wales.gsi.gov.uk](mailto:teachersqualconsultation@wales.gsi.gov.uk)

1. We are proposing to require that the period of practical teaching experience for those qualifying as a teacher on initial teacher training courses in Wales would need to be undertaken wholly or mainly in a school or other educational institution (except a pupil referral unit) in Wales which has met the national curriculum requirements. Do you agree with this?

**Note:** This would not mean that the entire period of practical teaching experience had to be in schools or other educational institutions which met the national curriculum requirements, as it is recognised that this would not necessarily be required for all training designed to enable trainee teachers to demonstrate that they have met the Qualified Teacher Status Standards. The requirement would be that, for the overall total period of practical teaching experience, the majority would have had to have been in schools or other educational institutions (except for pupil referral units) which met the national curriculum requirements.

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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**Comments:**

This seems a sensible approach.

2. We want to replace the provision in the Education (School Teachers' Qualifications) (Wales) Regulations 2004 which recognises as a qualified teacher in Wales any persons who are qualified teachers by virtue of regulations made in relation to England with a more specific provision which only covers certain categories of persons qualifying in England.

This replacement provision would cover persons qualifying as a teacher in England through:

- (x) an initial teacher training course at an accredited institution there;
- (xi) assessment against the specified standards there, but without having undertaken a specific initial teacher training course (known as the Assessment Only route);
- (xii) successful completion of a period of training on an employment-based teacher training scheme in England.

Do you agree with this?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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**Comments:**

The GTCS is currently more restrictive than this, only accepting teachers from the English system who have successfully completed route (i). However, independence for the GTCS (from April of this year) will give the GTCS increased powers and we may consider different approaches in the future – one possibility being the potential accreditation of specific Graduate Teacher Programmes which meet Scottish requirements.

3. We want to prevent someone who may have gained recognition as a teacher in Scotland or Northern Ireland without having taught in those countries from being able to be qualified as a teacher in Wales. We propose to have an effective requirement of having to have worked 60 days in an educational institution in those countries. Do you agree with this?

**Note:** The 60-day period is not intended to provide a demonstration of proficiency for teaching purposes in schools in Wales, but to prevent overseas-trained teachers with no teaching experience in Britain from gaining Qualified Teacher Status by registering in Scotland or Northern Ireland.

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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**Comments:**

Scotland would not wish to be seen as a backdoor to recognition in Wales for overseas teachers but we would comment that, as phrased, the current wording suggests that this also applies to a Newly Qualified Teacher from a Scottish initial teacher education university programme. Is this intended?

4. Do you agree that for those who could be qualified teachers by virtue of their recognition as teachers in schools in Northern Ireland, we should now refer to registration with the General Teaching Council for Northern Ireland?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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**Comments:**

Yes.

5. Do you agree that we should not continue with a provision allowing qualification as a teacher by certain independent school or further education teachers on the basis of qualifications gained before 1974, or 1989 in certain subjects?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
-------	-------------------------------------	----------	--------------------------	----------	--------------------------

**Comments:**

This seems to be a largely historical matter and as such there is a clear rationale for the proposed change.

6. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

**Comments:**

Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept confidential, please tick here:

18 – Anonymous

Page used to send this email:	/consultations/forms/qualregulations112/
Name:	Name and address supplied
Organisation:	
Address:	
Postcode:	
e-mail:	
Telephone number:	
Q1:	Agree
Comments:	
Q2:	Agree
Comments:	
Q3:	Agree
Comments:	
Q4:	Not sure
Comments:	
Q5:	Agree
Comments:	
Comments: Q6	
Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous (not to say that it came from you) please tick the box:	(Checked)

## Updated qualifications regulations for school teachers in Wales

### Consultation Response Form

Your name: Dr Philip Dixon

Organisation (if applicable): ATL- The Association of  
Teachers and Lecturers

e-mail/telephone number: [cymru@atl.org.uk](mailto:cymru@atl.org.uk)  
02920 465 000

Your address: 1<sup>st</sup> Floor, 64 B Newport Road, Cardiff,  
CF24 0DF

Responses should be returned by **30 January 2012** to:

Gail Deane  
Learning Improvement and Professional Development Division  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

or completed electronically and sent to:

[teachersqualconsultation@wales.gsi.gov.uk](mailto:teachersqualconsultation@wales.gsi.gov.uk)

1. We are proposing to require that the period of practical teaching experience for those qualifying as a teacher on initial teacher training courses in Wales would need to be undertaken wholly or mainly in a school or other educational institution (except a pupil referral unit) in Wales which has met the national curriculum requirements. Do you agree with this?

**Note:** This would not mean that the entire period of practical teaching experience had to be in schools or other educational institutions which met the national curriculum requirements, as it is recognised that this would not necessarily be required for all training designed to enable trainee teachers to demonstrate that they have met the Qualified Teacher Status Standards. The requirement would be that, for the overall total period of practical teaching experience, the majority would have had to have been in schools or other educational institutions (except for pupil referral units) which met the national curriculum requirements.

<b>Agree</b>	<b>X</b>	<b>Disagree</b>		<b>Not sure</b>	
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**Comments:**

ATL believes that, as far as possible, it would be useful for the period of practical teaching experience to for all trainees to spend some time in a (PRU) pupil referral unit.

The increased amount of in school training is welcome.

We wish to register concern that some practitioners in the independent sector will not be able to get QTS under this proposal.

2. We want to replace the provision in the Education (School Teachers' Qualifications) (Wales) Regulations 2004 which recognises as a qualified teacher in Wales any persons who are qualified teachers by virtue of regulations made in relation to England with a more specific provision which only covers certain categories of persons qualifying in England.

This replacement provision would cover persons qualifying as a teacher in England through:

- (xiii) an initial teacher training course at an accredited institution there;
- (xiv) assessment against the specified standards there, but without having undertaken a specific initial teacher training course (known as the Assessment Only route);
- (xv) successful completion of a period of training on an employment-based teacher training scheme in England.

Do you agree with this?

<b>Agree</b>		<b>Disagree</b>		<b>Not sure</b>	<b>X</b>
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**Comments:**

Some concerns were raised about point (ii) and the AQR route. We seek assurances that this route is sufficiently rigorous in imparting and embedding the theoretical and philosophical underpinnings necessary for successful teaching practice

3. We want to prevent someone who may have gained recognition as a teacher in Scotland or Northern Ireland without having taught in those countries from being able to be qualified as a teacher in Wales. We propose to have an effective requirement of having to have worked 60 days in an educational institution in those countries. Do you agree with this?

**Note:** The 60-day period is not intended to provide a demonstration of proficiency for teaching purposes in schools in Wales, but to prevent overseas-trained teachers with no teaching experience in Britain from gaining Qualified Teacher Status by registering in Scotland or Northern Ireland.

<b>Agree</b>	<b>X</b>	<b>Disagree</b>		<b>Not sure</b>	
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<b>Comments:</b>
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4. Do you agree that for those who could be qualified teachers by virtue of their recognition as teachers in schools in Northern Ireland, we should now refer to registration with the General Teaching Council for Northern Ireland?

<b>Agree</b>	<b>X</b>	<b>Disagree</b>		<b>Not sure</b>	
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<b>Comments:</b>
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5. Do you agree that we should not continue with a provision allowing qualification as a teacher by certain independent school or further education teachers on the basis of qualifications gained before 1974, or 1989 in certain subjects?

<b>Agree</b>		<b>Disagree</b>	<b>X</b>	<b>Not sure</b>	
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<b>Comments:</b>
We need further clarification on this point as to qualifications and subjects before we can make an informed judgement.

## Diweddarau rheoliadau cymwysterau

**ar gyfer athrawon ysgol  
yng Nghymru Ffurflen  
Ymateb yr Ymgynghoriad**

Eich enw: **Rebecca Williams**  
Sefydliad (os yw'n gymwys): **Undeb  
Cenedlaethol Athrawon Cymru (UCAC)**  
Cyfeiriad e-bost/rhif ffôn:  
[rebecca@athrawon.com](mailto:rebecca@athrawon.com)/01970 639950  
Eich cyfeiriad: **UCAC, Ffordd Penglais,  
Aberystwyth SY23 2EU**

1. Rydym yn cynnig y dylai'r cyfnod o brofiad addysgu ymarferol ar gyfer y sawl sy'n cymhwyso fel athrawon ar gyrsiau hyfforddiant cychwynnol athrawon yng Nghymru gael ei gynnal yn gyfan gwbl neu'n bennaf mewn ysgol neu sefydliad addysgol arall (ac eithrio uned cyfeirio disgyblion) yng Nghymru sy'n bodloni gofynion y cwricwlwm cenedlaethol. A ydych yn cytuno â hyn?

**Noder:** Ni fyddai hyn yn golygu y byddai'n rhaid i'r cyfnod o brofiad addysgu ymarferol gael ei gynnal yn gyfan gwbl mewn ysgolion neu sefydliadau addysgol eraill sy'n bodloni gofynion y cwricwlwm cenedlaethol, gan y cydnabyddir na fyddai angen hyn o reidrwydd ar gyfer yr holl hyfforddiant sydd wedi'i gynllunio i alluogi athrawon dan hyfforddiant i ddangos eu bod wedi cyrraedd Safonau Statws Athro Cymwysedig. Byddai'r gofyniad yn nodi, ar gyfer y cyfnod o brofiad addysgu ymarferol yn gyffredinol, y byddai'n rhaid bod y rhan fwyaf o'r hyfforddiant wedi'i gynnal mewn ysgolion neu sefydliadau addysgol eraill (ac eithrio unedau cyfeirio disgyblion) sy'n bodloni gofynion y cwricwlwm cenedlaethol.

### Cytuno

2. Rydym am ddisodli'r ddarpariaeth yn Rheoliadau Addysg (Cymwysterau Athrawon Ysgol) (Cymru) 2004 sy'n cydnabod fel athro/athrawes cymwysedig yng Nghymru unrhyw unigolyn sy'n athro/athrawes cymwysedig yn rhinwedd y rheoliadau a wnaed mewn perthynas â Lloegr gyda darpariaeth fwy penodol sydd ond yn cwmpasu categorïau penodol o bobl sy'n cymhwyso yn Lloegr.

Byddai'r ddarpariaeth newydd hon yn cwmpasu pobl sy'n cymhwyso fel athro/athrawes yn Lloegr drwy:

- (i) cwrs hyfforddiant cychwynnol athrawon mewn sefydliad achrededig yno;
- (ii) asesiad yn erbyn y safonau penodedig yno, ond heb ymgymryd â chwrs hyfforddiant cychwynnol athrawon penodol (a elwir yn llwybr Asesiad yn Unig);
- (iii) cwblhau'n llwyddiannus gyfnod o hyfforddiant ar gynllun hyfforddiant athrawon ar sail cyflogaeth yn Lloegr.

A ydych yn cytuno â hyn?

## Cytuno

3. Rydym am atal rhywun a all fod wedi cael ei gydnabod fel athro/athrawes yn yr Alban neu Ogledd Iwerddon heb iddo/iddi fod wedi addysgu yn y gwledydd hynny rhag gallu cymhwyso fel athro/athrawes yng Nghymru. Rydym yn cynnig y dylid pennu gofyniad sy'n nodi bod yn rhaid gweithio 60 diwrnod mewn sefydliad addysgol yn y gwledydd hynny. A ydych yn cytuno â hyn?

**Noder:** Ni fwriedir i'r cyfnod o 60 diwrnod ddangos hyfedredd at ddibenion addysgu mewn ysgolion yng Nghymru. Yn hytrach, bwriedir iddo atal athrawon a hyfforddwyd dramor ac nad oes ganddyn nhw unrhyw brofiad o addysgu ym Mhrydain rhag ennill Statws Athro Cymwysedig drwy gofrestru yn yr Alban neu Ogledd Iwerddon

4. A ydych yn cytuno, ar gyfer y sawl a allai fod yn athrawon cymwysedig yn rhinwedd y ffaith iddyn nhw gael eu cydnabod fel athrawon mewn ysgolion yng Ngogledd Iwerddon, y dylem gyfeirio nawr at eu cofrestriad gyda Chyngor Addysgu Cyffredinol Gogledd Iwerddon?

## Cytuno

5. A ydych yn cytuno na ddylem barhau gyda darpariaeth sy'n caniatáu i rai ysgolion annibynnol neu athrawon addysg bellach ystyried bod pobl wedi cymhwyso fel athrawon ar sail cymwysterau a enillwyd cyn 1974, neu 1989 mewn rhai pynciau?

## Cytuno

**Noder:** Ni fwriedir i'r cyfnod o 60 diwrnod ddangos hyfedredd at ddibenion addysgu mewn ysgolion yng Nghymru. Yn hytrach, bwriedir iddo atal athrawon a hyfforddwyd dramor ac nad oes ganddyn nhw unrhyw brofiad o addysgu ym Mhrydain rhag ennill Statws Athro Cymwysedig drwy gofrestru yn yr Alban neu Ogledd Iwerddon.

## Cytuno

6. Rydym wedi gofyn nifer o gwestiynau penodol. Os oes gennych unrhyw faterion cysylltiedig nad ydym wedi ymdrin â nhw yn benodol, defnyddiwch y lle hwn i'w nodi:

## Sylwadau

Rydym yn cytuno yn ogystal â'r cynnig ychwanegol sydd yn y ddogfen 'rhagor o wybodaeth'.

## Updated qualifications regulations for school teachers in Wales

### Consultation Response Form

Your name:

Organisation (if applicable):

e-mail/telephone number:

Your address:

Responses should be returned by **30 January 2012** to:

Gail Deane  
Learning Improvement and Professional Development Division  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

or completed electronically and sent to:

[teachersqualconsultation@wales.gsi.gov.uk](mailto:teachersqualconsultation@wales.gsi.gov.uk)

1. We are proposing to require that the period of practical teaching experience for those qualifying as a teacher on initial teacher training courses in Wales would need to be undertaken wholly or mainly in a school or other educational institution (except a pupil referral unit) in Wales which has met the national curriculum requirements. Do you agree with this?

**Note:** This would not mean that the entire period of practical teaching experience had to be in schools or other educational institutions which met the national curriculum requirements, as it is recognised that this would not necessarily be required for all training designed to enable trainee teachers to demonstrate that they have met the Qualified Teacher Status Standards. The requirement would be that, for the overall total period of practical teaching experience, the majority would have had to have been in schools or other educational institutions (except for pupil referral units) which met the national curriculum requirements.

<b>Agree</b>	<input checked="" type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Comments:**

A more precise definition of what the majority means in practice is advisable. The wording needs to be very carefully considered so as not to totally exclude an Independent School which may not offer welsh within the curriculum, from participating in ITT.

2. We want to replace the provision in the Education (School Teachers' Qualifications) (Wales) Regulations 2004 which recognises as a qualified teacher in Wales any persons who are qualified teachers by virtue of regulations made in relation to England with a more specific provision which only covers certain categories of persons qualifying in England.

This replacement provision would cover persons qualifying as a teacher in England through:

- (xvi) an initial teacher training course at an accredited institution there;
- (xvii) assessment against the specified standards there, but without having undertaken a specific initial teacher training course (known as the Assessment Only route);
- (xviii) successful completion of a period of training on an employment-based teacher training scheme in England.

Do you agree with this?

<b>Agree</b>	<input checked="" type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Comments:**

3. We want to prevent someone who may have gained recognition as a teacher in Scotland or Northern Ireland without having taught in those countries from being able to be qualified as a teacher in Wales. We propose to have an effective requirement of having to have worked 60 days in an educational institution in those countries. Do you agree with this?

**Note:** The 60-day period is not intended to provide a demonstration of proficiency for teaching purposes in schools in Wales, but to prevent overseas-trained teachers with no teaching experience in Britain from gaining Qualified Teacher Status by registering in Scotland or Northern Ireland.

<b>Agree</b>	<input checked="" type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Comments:**

4. Do you agree that for those who could be qualified teachers by virtue of their recognition as teachers in schools in Northern Ireland, we should now refer to registration with the General Teaching Council for Northern Ireland?

<b>Agree</b>	<input checked="" type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------	--------------------------

**Comments:**

5. Do you agree that we should not continue with a provision allowing qualification as a teacher by certain independent school or further education teachers on the basis of qualifications gained before 1974, or 1989 in certain subjects?

<b>Agree</b>	<input checked="" type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Comments:**

6. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

**Comments:**

Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept confidential, please tick here:

22 – GTCNI

Name: Barney Ball

Organisation: The General Teaching Council for Northern Ireland

Address: Albany House, 73-75 Great Victoria Street, Belfast

Postcode: BT2 7AF

Email: [bball@gtcni.org.uk](mailto:bball@gtcni.org.uk)

Telephone Number: 02890333390

The General Teaching Council for Northern Ireland is the statutory, independent body for the teaching profession and is dedicated to enhancing the status of teaching and promoting the highest standards of professional conduct and practice.

In responding to this consultation the Council is minded that, for the most part, affirmative or negative responses are rightfully the prerogative of those parties directly affected by the proposal i.e. the education service in Wales. However, in this instance the GTCNI (the Council) is interested in any implications that the proposed changes might have for teachers who have completed an accredited programme of ITE in Northern Ireland and teachers that have been registered by the Council as qualified teachers but have completed their ITE outwith Northern Ireland. In addition, the Council is interested in the implications of the proposed change for teachers either trained or recognised in Wales who subsequently wish to seek registration in Northern Ireland.

## Question 1

We are proposing to require that the period of practical teaching experience for those qualifying as a teacher on initial teacher training courses in Wales would need to be undertaken wholly or mainly in a school or other educational institution (except a pupil referral unit) in Wales which met the national curriculum requirements. Do you agree with this?

**Note:** this would not mean that the entire period of practical teaching experience had to be in schools or other educational institutions which met the national curriculum requirements, as it is recognised that this would not necessarily be required for all training designed to enable trainee teachers to demonstrate that they have met the Qualified Teacher Status Standards. The requirement would be that, for the overall total period of practical teaching experience, the majority would have had to have been in schools or other educational institutions (except for pupil referral units) which met the national curriculum requirements.



Agree



Disagree



Not sure

This seems a rational and reasonable change which will help ensure that those undertaking ITT in accredited institutions in Wales have developed the required competence within an appropriate curricular environment.

## Question 2

We want to replace the provision in the Education (School Teachers' Qualifications) (Wales) Regulations 2004 which recognises as a qualified teacher in Wales any persons who are qualified teachers by virtue of regulations made in relation to England with a more specific provision which only cover certain categories of persons qualifying in England.

This replacement provision would cover persons qualifying as a teacher in England through (i) an initial teacher training course at an accredited institution there, (ii) assessment against the specified standards there, but without having undertaken a specific initial teacher training course (known as the Assessment Only route); and (iii) successful completion of a period of training on an employment-based teacher training scheme in England. Do you agree with this?



Agree



Disagree



Not sure

The Council feels that the categories identified are reasonable and are consistent with the approach taken by it in Northern Ireland. This will help ensure that teachers recognised in Wales, in accordance with the specified categories, who subsequently seek a registration with GTCNI can be processed effectively and efficiently.

### Question 3

We want to prevent someone who may have gained recognition as a teacher in Scotland or Northern Ireland without having taught in those countries from being able to be qualified as a teacher in Wales. We propose to have an effective requirement of having to have worked 60 days in an educational institution in those countries. Do you agree with this?

**Note:** the 60 day period is not intended to provide a demonstration of proficiency for teaching purposes in schools in Wales, but to prevent overseas trained teachers with no teaching experience in Britain from gaining Qualified Teacher Status by registering in Scotland or Northern Ireland.

- Agree
- Disagree
- Not sure

The Council supports this requirement for teachers who have received recognition as teachers in Northern Ireland (through registration with the Council). The Council was initially concerned that this might have an adverse impact on teachers trained in Northern Ireland wishing to teach in Wales. However, after a further perusal of the 2004 Regulations it is clear that 'recognised' constitutes a different category to 'those who have completed a course of initial training for teachers in Scotland and Northern Ireland', and therefore, the Council has no concerns regarding this proposal. Indeed, if it prevents a potential 'backdoor' route to being recognised in Wales, the Council welcomes the proposal, as it will prevent the wasteful processing of applications from teachers who do not intend to teach in Northern Ireland.

### Question 4

Do you agree that for those who could be qualified teachers by virtue of their recognition as teachers in schools in Northern Ireland, we should now refer to registration with the General Teaching Council for Northern Ireland?

- Agree
- Disagree
- Not sure

This proposal recognises and reflects changes in Northern Ireland and is welcomed by the Council.

### Question 5

Do you agree that we should not continue with a provision allowing qualification as a teacher by certain independent school or further education teachers on the basis of qualifications gained before 1974, or 1989 in certain subjects?

- Agree
- Disagree
- Not sure

No Comment.

### Question 6

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

No Comment.

Page used to send this email:	/consultations/forms/qualregulations112/
Name:	Christopher Proudlove
Organisation:	
Address:	37 Everard Road Rhos on Sea Conwy
Postcode:	LL28 4EY
e-mail:	<a href="mailto:chris.proudlove@gmail.com">chris.proudlove@gmail.com</a>
Telephone number:	01492540615
Q1:	Disagree
Comments:	<p>This proposal suggests that practical teaching experience relies on maintained schools and the national curriculum to deliver the required level of experience in order for an individual to become and experienced teacher. This is clearly ridiculous. Individuals have an innate ability: either they can teach, or they can not. If that individual has graduated in a subject and subsequently undertaken the GTP process, overseen by an accredited university, and satisfied that organisation as to his or her teaching ability, surely that is enough.</p>
Q2:	Disagree
Comments:	<p>The individual who wrote this question does not have a command of language. If this means that the teachers described in points i, ii, and iii are the only ones Wales will recognise as such, then the UK in general, and Wales in particular, will become increasingly inward looking, insular and isolated. Countries outside the UK and the EU have spectacularly successful universities and teacher training programmes. If a person has the necessary qualifications and has satisfied the authorities in his or her home country that he or she is capable of being a competent teacher, then for Wales to not take advantage of that expertise is simply crass.</p>

Q3:	Disagree
Comments:	If you have qualified as a teacher, then you are a qualified teacher. Or perhaps you want only Welsh people to teach in Welsh schools. We live in a global economy; Wales should embrace the opportunity of having our children taught by individuals who have an experience of the world outside the Principality.
Q4:	Disagree
Comments:	See my answer to Question 4. What does registration matter? Will this produced better teachers? I think not.
Q5:	Disagree
Comments:	This smacks of ageism.
Comments: Q6	I find it interesting that you have not specifically asked whether or not respondents to this consultation support the notion that _specified_ teachers in independent schools or further education be excluded from the replacement regulations. I note further that this point is buried at the foot of your consultation document and has no comments or explanation attached. I would be interested to hear your reasons behind this specific proposal. Are you against independent schools and further education? Do you believe their respective staffs are somehow less well trained or qualified than those in maintained schools? Is it because they do not necessarily follow your idea of the national curriculum? This entire set of proposals is akin to discrimination. Wales for the Welsh. Should your proposals ever see the light of day, I hope teachers and teachers' unions take you to the Court of Human Rights. Wales will end up a laughing stock in a world that will pass it by, its children destined for a life of world ignorance. Please make my remarks public. Yours faithfully Christopher Proudlove
Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous (not to say that it came from you) please tick the box:	(Unchecked)

No 24 – NAHT Cymru

Page used to send this email:	/consultations/forms/qualregulations112/
Name:	Anna Brychan
Organisation:	NAHT Cymru
Address:	9 Columbus Walk Brigantine Place Grangetown Cardiff
Postcode:	CF10 4BY
e-mail:	<a href="mailto:anna.brychan@naht.org.uk">anna.brychan@naht.org.uk</a>
Telephone number:	
Q1:	Agree
Comments:	We would ask that you ensure that proper consideration has been given to the implications of this particularly in independent schools which do not universally offer Welsh.
Q2:	Agree
Comments:	
Q3:	Agree
Comments:	
Q4:	Agree
Comments:	
Q5:	Agree
Comments:	
Comments: Q6	
Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous (not to say that it came from you) please tick the box:	(Unchecked)

## Updated qualifications regulations for school teachers in Wales

### Consultation Response Form

Your name: **Sarah Lewis**

Organisation (if applicable): **Estyn**

e-mail/telephone number: [sarah.lewis@estyn.gov.uk](mailto:sarah.lewis@estyn.gov.uk)

Your address: **Anchor Court, Keen Road, Cardiff  
CF24 5JW**

Responses should be returned by **30 January 2012** to:

Gail Deane  
Learning Improvement and Professional Development Division  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

or completed electronically and sent to:

[teachersqualconsultation@wales.gsi.gov.uk](mailto:teachersqualconsultation@wales.gsi.gov.uk)

1. We are proposing to require that the period of practical teaching experience for those qualifying as a teacher on initial teacher training courses in Wales would need to be undertaken wholly or mainly in a school or other educational institution (except a pupil referral unit) in Wales which has met the national curriculum requirements. Do you agree with this?

**Note:** This would not mean that the entire period of practical teaching experience had to be in schools or other educational institutions which met the national curriculum requirements, as it is recognised that this would not necessarily be required for all training designed to enable trainee teachers to demonstrate that they have met the Qualified Teacher Status Standards. The requirement would be that, for the overall total period of practical teaching experience, the majority would have had to have been in schools or other educational institutions (except for pupil referral units) which met the national curriculum requirements.

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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<b>Comments:</b>
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2. We want to replace the provision in the Education (School Teachers' Qualifications) (Wales) Regulations 2004 which recognises as a qualified teacher in Wales any persons who are qualified teachers by virtue of regulations made in relation to England with a more specific provision which only covers certain categories of persons qualifying in England.

This replacement provision would cover persons qualifying as a teacher in England through:

- (xix) an initial teacher training course at an accredited institution there;
- (xx) assessment against the specified standards there, but without having undertaken a specific initial teacher training course (known as the Assessment Only route);
- (xxi) successful completion of a period of training on an employment-based teacher training scheme in England.

Do you agree with this?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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<b>Comments:</b>
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3. We want to prevent someone who may have gained recognition as a teacher in Scotland or Northern Ireland without having taught in those countries from being able to be qualified as a teacher in Wales. We propose to have an effective requirement of having to have worked 60 days in an educational institution in those countries. Do you agree with this?

**Note:** The 60-day period is not intended to provide a demonstration of proficiency for teaching purposes in schools in Wales, but to prevent overseas-trained teachers with no teaching experience in Britain from gaining Qualified Teacher Status by registering in Scotland or Northern Ireland.

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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**Comments:**

4. Do you agree that for those who could be qualified teachers by virtue of their recognition as teachers in schools in Northern Ireland, we should now refer to registration with the General Teaching Council for Northern Ireland?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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**Comments:**

5. Do you agree that we should not continue with a provision allowing qualification as a teacher by certain independent school or further education teachers on the basis of qualifications gained before 1974, or 1989 in certain subjects?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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**Comments:**

6. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

**Comments:**

Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept confidential, please tick here:

## Updated qualifications regulations for school teachers in Wales

### Consultation Response Form

Your name:

Edward Pryce,  
Senior Adviser

On behalf of:

Organisation (if applicable):

Caerphilly CBC

e-mail/telephone number:

Your address:

Responses should be returned by **30 January 2012** to:

Gail Deane  
Learning Improvement and Professional Development Division  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

or completed electronically and sent to:

[teachersqualconsultation@wales.gsi.gov.uk](mailto:teachersqualconsultation@wales.gsi.gov.uk)

1. We are proposing to require that the period of practical teaching experience for those qualifying as a teacher on initial teacher training courses in Wales would need to be undertaken wholly or mainly in a school or other educational institution (except a pupil referral unit) in Wales which has met the national curriculum requirements. Do you agree with this?

**Note:** This would not mean that the entire period of practical teaching experience had to be in schools or other educational institutions which met the national curriculum requirements, as it is recognised that this would not necessarily be required for all training designed to enable trainee teachers to demonstrate that they have met the Qualified Teacher Status Standards. The requirement would be that, for the overall total period of practical teaching experience, the majority would have had to have been in schools or other educational institutions (except for pupil referral units) which met the national curriculum requirements.

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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**Comments:**

The additional requirement for the entire practical teaching experience to be in educational institutions which meet the appropriate national curriculum requirements are appropriate. Teachers will be expected to have experience of the relevant phase of education and the national curriculum. Such experience is best gained in educational institutions which are teaching that curriculum.

2. We want to replace the provision in the Education (School Teachers' Qualifications) (Wales) Regulations 2004 which recognises as a qualified teacher in Wales any persons who are qualified teachers by virtue of regulations made in relation to England with a more specific provision which only covers certain categories of persons qualifying in England.

This replacement provision would cover persons qualifying as a teacher in England through:

- (xxii) an initial teacher training course at an accredited institution there;
- (xxiii) assessment against the specified standards there, but without having undertaken a specific initial teacher training course (known as the Assessment Only route);
- (xxiv) successful completion of a period of training on an employment-based teacher training scheme in England.

Do you agree with this?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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**Comments:**

The ability of appropriately qualified teacher to move freely between teaching in Wales and England should be protected. It is currently unclear whether this change to specific qualifications will limit that ability in any way.

3. We want to prevent someone who may have gained recognition as a teacher in Scotland or Northern Ireland without having taught in those countries from being able to be qualified as a teacher in Wales. We propose to have an effective requirement of having to have worked 60 days in an educational institution in those countries. Do you agree with this?

**Note:** The 60-day period is not intended to provide a demonstration of proficiency for teaching purposes in schools in Wales, but to prevent overseas-trained teachers with no teaching experience in Britain from gaining Qualified Teacher Status by registering in Scotland or Northern Ireland.

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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**Comments:**

This rule remove a loophole which may have granted an inexperienced overseas-trained teacher from gaining QTS. This does not prevent such teachers from gaining QTS through a route which enables their eligibility to be appropriately assessed.

4. Do you agree that for those who could be qualified teachers by virtue of their recognition as teachers in schools in Northern Ireland, we should now refer to registration with the General Teaching Council for Northern Ireland?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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**Comments:**

If that is the appropriate body that oversees registration then yes.

5. Do you agree that we should not continue with a provision allowing qualification as a teacher by certain independent school or further education teachers on the basis of qualifications gained before 1974, or 1989 in certain subjects?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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**Comments:**

The removal of this provision would seem to bring regulations into line with England and will not have any consequences for existing teachers.

6. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

**Comments:**

No further comments.

Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept confidential, please tick here:



**Welsh Government**  
**Updated qualifications regulations for school teachers in Wales**  
**January 2012**

1. The NASUWT welcomes the opportunity to comment on the proposals to update the qualifications regulations for school teachers in Wales.
2. The NASUWT is the largest teachers' union in Wales and the UK representing teachers and school leaders.

**GENERAL COMMENTS**

3. The NASUWT questions the underlying approach that appears to be being taken by the Welsh Government in relation to Qualified Teacher Status (QTS).
4. The NASUWT notes the concerns of the Welsh Government in relation to the changes being proposed by the Department for Education (DfE) in England that will make it easier for certain categories of teachers to obtain QTS and that these changes would automatically apply in Wales because of the construction of the Education (School Teachers' Qualifications) (Wales) Regulations 2004 (the 2004 Regulations).
5. However, the NASUWT is concerned that the updated replacement for the 2004 Regulations, as proposed, could be viewed as casting doubt not only on the currency of teaching qualifications achieved in countries outside the European Communities but also within the UK.

6. The NASUWT is unconvinced by the arguments relating to the provisions that would require teachers to have practical experience of teaching in Wales and/or in the UK nation in which they trained.
7. The NASUWT maintains that the Welsh Government has based the proposals on political imperatives rather than on the equity of teaching qualifications and has confused the matter of qualifications with that of employability.
8. Further, the NASUWT questions whether or not the proposals have been impact-assessed in terms of employment and equalities legislation.

## SPECIFIC COMMENTS

9. The NASUWT offers the observations and comments that follow in relation to the questions posed on the consultation response form.

1. We are proposing to require that the period of practical teaching experience for those qualifying as a teacher on initial teacher training courses in Wales would need to be undertaken wholly or mainly in a school or other educational institution (except a pupil referral unit) in Wales which has met the national curriculum requirements. Do you agree with this?

**Note:** This would not mean that the entire period of practical teaching experience had to be in schools or other educational institutions which met the national curriculum requirements, as it is recognised that this would not necessarily be required for all training designed to enable trainee teachers to demonstrate that they have met the Qualified Teacher Status Standards. The requirement would be that, for the overall total period of practical teaching experience, the majority would have had to have been in schools or other educational institutions (except for pupil referral units) which met the national curriculum requirements.

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input checked="" type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Comments:**

The NASUWT notes that the only change to the conditions enshrined in the 2004 Regulations is that teacher training in Wales would have to undertake a period of practical teaching experience wholly or mainly in a school or institution in Wales that meets the curriculum requirements that apply in Wales.

The NASUWT believes that placing such a restriction on trainee teachers and initial teacher training (ITT) providers could be prejudicial as it may not be possible for such practical teaching experience to be undertaken wholly or mainly in Wales in certain subject areas.

The NASUWT maintains that pedagogic principles and practice as well as subject knowledge and understanding must be at the centre of ITT rather than the curriculum requirements of a particular nation.

The NASUWT is gravely concerned that the Welsh Government could be seen to be suggesting that practical experience of teaching the Welsh curriculum is essential for those teachers trained in Wales to be able to practise as a teacher.

The NASUWT maintains that such an approach would undermine the values and importance of transferable skills and portability of employment.

Further, the NASUWT has some difficulty in reconciling the condition placed on teachers trained in Wales with other aspects of the proposals that would allow teachers trained outside of Wales to be able to teach in Wales without practical experience of teaching the Welsh curriculum.

The NASUWT maintains that the proposals, as constructed, are muddled, overly complicated and could leave the Welsh Government open to legal challenge.

2. We want to replace the provision in the Education (School Teachers' Qualifications) (Wales) Regulations 2004 which recognises as a qualified teacher in Wales any persons who are qualified teachers by virtue of regulations made in relation to England with a more specific provision which only covers certain categories of persons qualifying in England.

This replacement provision would cover persons qualifying as a teacher in England through:

(xxv) an initial teacher training course at an accredited institution there;

- (xxvi) assessment against the specified standards there, but without having undertaken a specific initial teacher training course (known as the Assessment Only route);
- (xxvii) successful completion of a period of training on an employment-based teacher training scheme in England.

Do you agree with this?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input checked="" type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Comments:**

Although the rationale that lies behind this proposal may have some merit, the NASUWT has no alternative other than to disagree with the updated provisions, as constructed, as teachers from countries outside the European Communities would be required to undertake further training and assessment.

The NASUWT believes that such a requirement casts doubt on the equity and comparability of the qualifications achieved by fully qualified teachers from Australia, Canada, New Zealand and the United States and other overseas teachers.

The NASUWT notes that the Welsh Government has not provided any objectively justifiable reason for placing this arbitrary restriction on such teachers.

The NASUWT puts the Welsh Government to proof that the standards and quality levels required in overseas countries, in particular but not exclusively, in Australia, Canada, New Zealand and the United States by the ITT systems and teaching qualifications are less thorough, rigorous or demanding than those in the UK and do not measure up to the Qualified Teacher Status Standards Wales 2009 (2009 No.25) (the 2009 QTS Standards).

The NASUWT believes that the compromise against adopting the position of the DfE in England in relation to further education teachers holding Qualified Teacher Learning and Skills (QTLS) status provided by the Education (Specified Work and Registration) (Wales) Regulations 2010 is sound.

The NASUWT acknowledges the valuable contribution and expertise of teachers holding QTLS but, on balance, believes that QTS should remain as the qualification for teachers working in the school setting.

3. We want to prevent someone who may have gained recognition as a teacher in Scotland or Northern Ireland without having taught in those countries from being able to be qualified as a teacher in Wales. We propose to have an effective requirement of having to have worked 60 days in an educational institution in those countries. Do you agree with this?

**Note:** The 60-day period is not intended to provide a demonstration of proficiency for teaching purposes in schools in Wales, but to prevent overseas-trained teachers with no teaching experience in Britain from gaining Qualified Teacher Status by registering in Scotland or Northern Ireland.

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input checked="" type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Comments:**

The NASUWT maintains that the Welsh Government is confusing employability with the suitability of teaching qualifications.

The NASUWT finds no logic in this proposal since there would be no such requirement placed on overseas teachers who are granted QTS in England.

The NASUWT maintains that the Welsh Government could be open to legal challenge if this proposal was adopted.

4. Do you agree that for those who could be qualified teachers by virtue of their recognition as teachers in schools in Northern Ireland, we should now refer to registration with the General Teaching Council for Northern Ireland?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input checked="" type="checkbox"/>
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**Comments:**

The NASUWT believes that this is a matter that should be discussed with the devolved administration in Northern Ireland.

The NASUWT suggests that the proposal in relation to the issuing of written notification by either the Welsh Minister or the General Teaching Council for Wales (GTCW) as referred to in paragraph 6 of the addendum to the consultation document provides a more appropriate approach.

However, the NASUWT reminds the Welsh Government that the role and function of the GTCW is under review and would not want to pre-empt the outcome of that review.

5. Do you agree that we should not continue with a provision allowing qualification as a teacher by certain independent school or further education teachers on the basis of qualifications gained before 1974, or 1989 in certain subjects?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input checked="" type="checkbox"/>
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**Comments:**

Although it is acknowledged that this provision no longer exists in England and that the passage of time and the number who have made use of the provision in recent years is small, the NASUWT would need to be satisfied that no disadvantage or discrimination would ensue if the provision was discontinued in Wales.

6. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

**Comments:**

The NASUWT would urge the Welsh Government to produce an impact assessment statement for each of the proposed changes to cover issues of:

- equality and fairness;
- discrimination and disadvantage;
- employment rights and human rights.

In addition, the NASUWT would put the Welsh Government to proof to provide objective justification for the proposed changes where it is implied that a teaching qualification gained outside Wales may not measure up to:

- the standards and quality level of ITT provision in Wales;
- the 2009 QTS Standards.

Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept confidential, please tick here:



Chris Keates

**General Secretary**

For further information on the Union's response, contact Rex Phillips, Wales Organiser.

NASUWT Cymru  
Greenwood Close  
Cardiff Gate Business Park  
Cardiff  
CF23 8RD  
029 2054 6080  
[www.nasuwt.org.uk](http://www.nasuwt.org.uk)  
[nasuwt@mail.nasuwt.org.uk](mailto:nasuwt@mail.nasuwt.org.uk)

28 – Department of Education Northern Ireland

Page used to send this email:	/consultations/forms/qualregulations112/
Name:	Peter O'Neill
Organisation:	Department of Education Northern Ireland
Address:	Rathgael House, Balloo Road, Rathgill, BANGOR Co. Down
Postcode:	BT19 7PR
e-mail:	<a href="mailto:peter.o'neill@deni.gov.uk">peter.o'neill@deni.gov.uk</a>
Telephone number:	02891279637
Q1:	Agree
Comments:	
Q2:	Agree
Comments:	
Q3:	Agree
Comments:	The Department supports this requirement for teachers who have received recognition as teachers in Northern Ireland (through registration with the GTCNI). While the Department was initially concerned that this might have an adverse impact on teachers trained in Northern Ireland wishing to teach in Wales, perusal of the 2004 Regulations has revealed that 'recognised' constitutes a different category to 'those who have completed a course of initial training for teachers in Scotland and Northern Ireland', and therefore, the Department has no concerns regarding this proposal.
Q4:	Agree
Comments:	
Q5:	
Comments:	

Comments: Q6	No Comment
Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous (not to say that it came from you) please tick the box:	(Unchecked)



**WALES  
CYMRU**

## **RESPONSE TO: Updated qualifications regulations for school teachers in Wales**

### **CONSULTATION**

**Contact Details:**

**Lieu Williams  
Wales Official  
UCU  
Unit 33, The Enterprise Centre  
Tondu  
BRIDGEND  
CF32 9BS**

**Tel: 01656 721951  
E-mail: [lwilliams@ucu.org.uk](mailto:lwilliams@ucu.org.uk)  
About UCU Wales**

The University and College Union (UCU) represents more than 120,000 academics, lecturers, trainers, instructors, researchers, managers, administrators, computer

staff, librarians and postgraduates in universities, colleges, prisons, adult education and training organisations across the UK.

UCU is the largest post-school union in the world: a force working for educators and education that employers and the government cannot ignore.

It was formed on 1 June 2006 by the amalgamation of two strong partners – the Association of University Teachers (AUT) and NATFHE-the University & College Lecturers' Union – who shared a long [history](#) of defending and advancing educators' employment and professional interests.

## Introduction

UCU Wales welcomes the opportunity to comment on the Welsh Government's consultation on updated qualifications regulations for school teachers in Wales. UCU Wales believes that any future changes to the qualifications regulation in Wales must reflect the change of policy in Wales in light of the Learning and Skills Measure (Wales) 2009. Further comments by UCU Wales are listed as per question below.

1. We are proposing to require that the period of practical teaching experience for those qualifying as a teacher on initial teacher training courses in Wales would need to be undertaken wholly or mainly in a school or other educational institution (except a pupil referral unit) in Wales which has met the national curriculum requirements.

Do you agree with this?

**Note:** This would not mean that the entire period of practical teaching experience had to be in schools or other educational institutions which met the national curriculum requirements, as it is recognised that this would not necessarily be required for all training designed to enable trainee teachers to demonstrate that they have met the Qualified Teacher Status Standards. The requirement would be that, for the overall total period of practical teaching experience, the majority would have had to have been in schools or other educational institutions (except for pupil referral units) which met the national curriculum requirements.

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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### Comments:

UCU Wales agrees that the period of practical teaching experience for those qualifying as teachers on initial teacher training in Wales needs to be undertaken wholly or mainly in a school or education institution.

For the successful implementation of the Learning and Skills Measure (Wales) 2009, UCU Wales believes that any period of initial teacher training for secondary and further education needs to reflect the demands of 14-19 pathways. The Education (Specified Work and Registration) (Wales) Regulations 2010 allows qualified further education teachers to deliver vocational courses in maintained schools within the local curriculum under the Learning and Skills Measure (Wales) 2009.

UCU Wales believes that the Learning and Skills (Wales) Measure has led to an increased pressure on lecturers with regards to professional practice. As part of the Measure, learners in the 14-16 age cohorts now attend lectures at FE colleges, which increases pressure on lecturers as they have not received the training required to work with this age cohort. For example, learners at 14 years of age require more supervision in a workshop environment whilst undertaking a vocational engineering course than that an older learner would, which means more time is spent supervising the class rather than teaching the class.

UCU Wales understands that the previous, as well as the current, PGCE FE course doesn't cover working with learners under the age of 16. UCU Wales believes that if FE teachers are expected to work with learners under the age of 16, then these needs have to be catered for in the PGCE FE as well as suitable training for current practitioners.

In addition, UCU Wales believes ITT providers for secondary school PGCE should consider placements in FE colleges, and vice versa for PGCE FE in secondary schools, for purposes of practical teaching experience to reflect 14-19 pathways, which is essential to delivering the current national curriculum.

UCU Wales believes that these actions by the Welsh Government will help drive up standards and attainments within education in Wales.

2. We want to replace the provision in the Education (School Teachers' Qualifications) (Wales) Regulations 2004 which recognises as a qualified teacher in Wales any persons who are qualified teachers by virtue of regulations made in relation to England with a more specific provision which only covers certain categories of persons qualifying in England.

This replacement provision would cover persons qualifying as a teacher in England through:

- (xxviii) an initial teacher training course at an accredited institution there;
- (xxix) assessment against the specified standards there, but without having undertaken a specific initial teacher training course (known as the Assessment Only route);
- (xxx) successful completion of a period of training on an employment-based teacher training scheme in England.

Do you agree with this?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments:

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3. We want to prevent someone who may have gained recognition as a teacher in Scotland or Northern Ireland without having taught in those countries from being able to be qualified as a teacher in Wales. We propose to have an effective requirement of having to have worked 60 days in an educational institution in those countries. Do you agree with this?

**Note:** The 60-day period is not intended to provide a demonstration of proficiency for teaching purposes in schools in Wales, but to prevent overseas-trained teachers with no teaching experience in Britain from gaining Qualified Teacher Status by registering in Scotland or Northern Ireland.

<b>Agree</b>	<input checked="" type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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<b>Comments:</b>

4. Do you agree that for those who could be qualified teachers by virtue of their recognition as teachers in schools in Northern Ireland, we should now refer to registration with the General Teaching Council for Northern Ireland?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input checked="" type="checkbox"/>
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<b>Comments:</b>
UCU Wales is not in a position to comment on whether the Welsh Government should refer qualified teachers in Northern Ireland to registration with the GTCNI.

5. Do you agree that we should not continue with a provision allowing qualification as a teacher by certain independent school or further education teachers on the basis of qualifications gained before 1974, or 1989 in certain subjects?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input checked="" type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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<b>Comments:</b>
UCU Wales does not support the Welsh Government's proposal to discontinue the provision allowing qualification as a further education teacher on the basis of qualifications gained before 1974, or 1989 in certain subjects.
UCU Wales believes the provision laid down in the 2004 regulations should remain as they are for further education teachers.

6. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

**Comments:**

UCU Wales would like to make further comment with regards to the Education (Specified Work and Registration) (Wales) Regulations 2010. Whilst these regulations allow qualified further education teachers to deliver vocational courses in maintained schools, UCU Wales believes this has to be extended to academic subjects.

UCU Wales believes that if the rationale behind these proposed changes is to be able to understand and teach the curriculum in Wales, UCU Wales believes that further education “qualified” teachers should be allowed to teach in schools on the same basis that overseas trained teachers are allowed.

The Learning and Skills Measure (Wales) 2009 requires for learners to be offered a minimum of thirty subjects, with a certain amount of courses offered being vocational courses, within a local authority delivered by schools and FE colleges. UCU Wales believes if we are to offer learners the widest possible choice then we must allow FE teachers to work in schools to deliver academic subjects that those schools do not have the resources to deliver.

UCU Wales would also expect that if FE teachers are expected to work with learners under the age of 16, then these needs should to be catered for in the PGCE FE as well as suitable training for current practitioners.

Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept confidential, please tick here:

## Updated qualifications regulations for school teachers in Wales

### Consultation Response Form

Your name: Hayden Llewellyn

Organisation (if applicable): The General Teaching  
Council for Wales

e-mail/telephone number:

[hayden.llewellyn@gtcw.org.uk](mailto:hayden.llewellyn@gtcw.org.uk) or 029 20460 099

Your address: 9<sup>th</sup> Floor, Eastgate House, 35-43  
Newport Road, Cardiff, CF24 0AB.

Responses should be returned by **30 January 2012** to:

Gail Deane  
Learning Improvement and Professional Development Division  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

or completed electronically and sent to:

[teachersqualconsultation@wales.gsi.gov.uk](mailto:teachersqualconsultation@wales.gsi.gov.uk)

1. We are proposing to require that the period of practical teaching experience for those qualifying as a teacher on initial teacher training courses in Wales would need to be undertaken wholly or mainly in a school or other educational institution (except a pupil referral unit) in Wales which has met the national curriculum requirements. Do you agree with this?

**Note:** This would not mean that the entire period of practical teaching experience had to be in schools or other educational institutions which met the national curriculum requirements, as it is recognised that this would not necessarily be required for all training designed to enable trainee teachers to demonstrate that they have met the Qualified Teacher Status Standards. The requirement would be that, for the overall total period of practical teaching experience, the majority would have had to have been in schools or other educational institutions (except for pupil referral units) which met the national curriculum requirements.

<b>Agree</b>	<input checked="" type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Comments:**

From data held on the Register of Qualified Teachers, the Council is aware that the vast majority of newly qualified teachers who teach in Wales train at ITT institutions in Wales. The proposal made by the Welsh Government is a practical one and will assist these persons in making the transition from training to employment as teachers in Wales.

2. We want to replace the provision in the Education (School Teachers' Qualifications) (Wales) Regulations 2004 which recognises as a qualified teacher in Wales any persons who are qualified teachers by virtue of regulations made in relation to England with a more specific provision which only covers certain categories of persons qualifying in England.

This replacement provision would cover persons qualifying as a teacher in England through:

- (xxxix) an initial teacher training course at an accredited institution there;
- (xxxixii) assessment against the specified standards there, but without having undertaken a specific initial teacher training course (known as the Assessment Only route);
- (xxxixiii) successful completion of a period of training on an employment-based teacher training scheme in England.

Do you agree with this?

<b>Agree</b>	<input checked="" type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Comments:**

The Council supports this proposal given the plans in England to introduce revised Regulations which will mean that persons with QTLS and teachers qualified in the United States, Canada, Australia and New Zealand will become qualified teachers in England.

The Council is conscious that Wales already has a surplus of qualified teachers in the primary phase and many secondary subjects, together with the fact that the Welsh Government revised the Education (Specified Work and Registration) (Wales) Regulations in 2010 such that FE teachers may now teach vocational subjects in maintained schools under the Learning and Skills (Wales) Measure 2009.

On this basis, the Welsh Government's proposal is eminently sensible.

3. We want to prevent someone who may have gained recognition as a teacher in Scotland or Northern Ireland without having taught in those countries from being able to be qualified as a teacher in Wales. We propose to have an effective requirement of having to have worked 60 days in an educational institution in those countries. Do you agree with this?

**Note:** The 60-day period is not intended to provide a demonstration of proficiency for teaching purposes in schools in Wales, but to prevent overseas-trained teachers with no teaching experience in Britain from gaining Qualified Teacher Status by registering in Scotland or Northern Ireland.

<b>Agree</b>	<input checked="" type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Comments:**

Council officers have previously raised concerns with the Welsh Government where the Council has received applications for QTS from teachers qualified in Northern Ireland and Scotland who have never taught there and in some cases never even visited those countries. The Council is aware that the 60 days provision has already been introduced in England and fully supports its introduction in Wales.

4. Do you agree that for those who could be qualified teachers by virtue of their recognition as teachers in schools in Northern Ireland, we should now refer to registration with the General Teaching Council for Northern Ireland?

<b>Agree</b>	<input checked="" type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Comments:**

The Council supports this proposal, bringing consistency with the existing wording of the 2004 Regulations for teachers from Scotland.

5. Do you agree that we should not continue with a provision allowing qualification as a teacher by certain independent school or further education teachers on the basis of qualifications gained before 1974, or 1989 in certain subjects?

<b>Agree</b>	<input checked="" type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Comments:**

In administering the award of Qualified Teacher Status on behalf of the Welsh Government since 2003, the Council has only confirmed an award to two teachers through this provision. As such, the Council believes that there has been ample time and opportunity for such persons to seek recognition.

6. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

**Comments:**

The Council has been asked to respond specifically to the letter from the Welsh Government dated 13<sup>th</sup> December 2011, which proposes *that “persons who are entitled to practise in the UK pursuant to Part 2 and Chapters 1, 2, 4 of the European Communities (recognition of Professional Qualifications) (Regulations) 2007 and are qualified teachers must receive written notification of this from Welsh Ministers or the GTCW”.*

The Council supports this proposal, noting that it already undertakes this function of behalf of the Welsh Government as specified in the annual “letter of offer of grant” made under the authority of the Minister for Children, Education and Lifelong Learning.

Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept confidential, please tick here: