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Consultation – summary of responses

Updated qualifications regulations for school teachers in Wales

Date of issue: April 2012



Updated qualifications regulations for school teachers in Wales

Audience	All bodies concerned with initial teacher training in Wales leading to Qualified Teacher Status (QTS); higher education institutions; the Higher Education Funding Council for Wales (HEFCW); the Universities Council for the Education of Teachers Cymru (UCET Cymru); Estyn; The General Teaching Council for Wales (GTCW); General Teaching Councils for England (GTCE), Scotland (GTCS) and Northern Ireland (GTCNI); local authorities in Wales; teaching and lecturers' unions; maintained schools; the Independent Schools Council; and other interested parties.
Overview	This document provides a summary of responses and feedback on the consultation on proposals for updated qualifications regulations for school teachers in Wales. The proposals would make changes to some of the requirements for recognition as a qualified teacher in Wales.
Action required	None – for information only.
Further information	Further information about this consultation can be obtained from: Gail Deane Learning Improvement and Professional Development Division Welsh Government Cathays Park Cardiff CF10 3NQ Tel: 029 2082 6530 e-mail: teachingenquiries@wales.gsi.gov.uk
Additional copies	The consultation documents can be accessed from the Welsh Government's website at www.wales.gov.uk/consultations

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1. Introduction and overview

1.1 The Welsh Government has consulted on proposals for an updated replacement for the Education (School Teachers' Qualifications) (Wales) Regulations 2004 ("the 2004 Regulations"). These would make changes to some of the requirements for recognition as a qualified teacher in Wales:

- (a) the period of practical teaching experience, required to be undertaken in a school or other educational institution by anyone on an initial teacher training ("ITT") course in Wales, would need to be wholly or mainly in one in which the national curriculum was delivered;
- (b) the present blanket recognition as a qualified teacher of all those who qualify under the English School Teachers' Qualifications Regulations would be replaced with a more specific recognition of certain qualified teachers in England only. This provision would mean that only the following persons qualifying as a teacher in England would be recognised as a qualified teacher in Wales:-
 - (i) those who qualified through an initial teacher training course at an accredited institution in England;
 - (ii) those who were successfully assessed against the specified standards in England, but without having undertaken a specific initial teacher training course (known as the Assessment Only route);
 - (iii) those who successfully completed a period of training on an employment-based teacher training scheme in England.

This approach would mean that proposals in England to allow all further education ("FE") teachers with Qualified Teacher Learning and Skills ("QTLS") status and teachers with full qualifications from Australia, Canada, New Zealand and the United States to become qualified teachers would not apply in Wales;

- (c) persons who have been recognised as a teacher in Scotland or Northern Ireland need to have undertaken a period of practical teaching experience there in order to be recognised as a qualified teacher in Wales. This would prevent overseas trained teachers becoming qualified teachers in Wales via Scotland or Northern Ireland without having taught in the UK;
- (d) in order to update the legislation, recognition of teachers from Northern Ireland would now refer to registration with the General Teaching Council for Northern Ireland ("GTCNI").

1.2 We also proposed to no longer allow qualification as a teacher in Wales for certain independent school or further education teachers who gained qualifications before 1974, or 1989 in specified subjects. There would also be some miscellaneous changes and updating from the 2004 Regulations generally.

2. The consultation process

2.1 Views were sought from stakeholders to inform consideration of the proposed policy changes. A further addendum to the consultation was published after the start of the consultation. This additional information was notified to all stakeholder groups and sent to all respondees who had already submitted their response. This report summarises all of the comments received during the public consultation process together with our response. Some of the responses included general comments not directly related to the questions asked and these are addressed in more detail in section 4.

2.2 The consultation closed on 30 January 2012. A total of 16 responses to the consultation were received from organisations. One organisation commented on only one of the questions raised. Two of the responses were from organisations which did not wish to be identified. A total of 14 responses were received from individuals. Eight of the responses from individuals asked for them not to be identified. Synopses of the main points raised are outlined below, along with the resulting action taken in response to these and feedback on the main themes and key points raised. A list of respondees is provided in Annex A with the exception of the 10 organisations and individuals who asked for their details to be kept confidential. Copies of responses received from identified organisations and individuals are at Annex B.

2.3 Some comments were outside the scope of the consultation, and although every effort was made to link these responses to the specific themes of the consultation this was not always possible. However, the essence of all such comments has been fully considered.

2.4 The consultation document and response proforma adopted for this consultation can be found in the Education and Skills section (closed consultations) on the Welsh Government's website at www.wales.gov.uk/consultations.

2.5 We would like to take this opportunity to thank everyone who responded to the consultation for their contribution.

3. Comments on the consultation questions and our response and feedback

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 has met the national curriculum requirements. Do you agree with this?

Points raised

3.1.1 Fourteen of the sixteen organisations who commented on this question agreed with this proposal and two disagreed. The fourteen individuals who responded disagreed with this proposal.

3.1.2 Responses from those agreeing with the proposal felt that the majority of teachers qualifying in Wales would be expected to have experience of the relevant phase of education and the related national curriculum. The view expressed was that such experience was best gained in training through educational institutions which are teaching that curriculum.

3.1.3 The majority of those disagreeing with the proposal were individuals from independent schools. Comments included that practical teaching experience should be allowed to be undertaken in a school setting which did not teach the national curriculum provided the majority of curriculum subjects (including the one the teacher is training to teach) were taught there. Some of these responses felt that the teaching of Welsh as part of the curriculum inappropriate in most independent schools. Concern was expressed that this proposal would prevent teachers at independent schools from qualifying through employment-based teacher training, or that it would prevent induction for newly qualified teachers taking place at independent schools.

3.1.4 A few responses queried what the percentage of time spent 'mainly' in a school or other educational institution would constitute.

3.1.5 One organisation, in agreeing with the proposal, felt that ITT providers running secondary PGCE should consider placements in FE colleges for the purposes of practical teaching experience to reflect 14-19 pathways, which it viewed as essential to delivering the current national curriculum. The same organisation also offered some views on further education PGCE (FE) courses, although these were out with the scope of the consultation. Another organisation agreeing with the proposal suggested that it would be useful for the period of practical teaching experience for all trainees to spend some time in a pupil referral unit (PRU).

3.1.6 One organisation felt that it might not be possible for practical teaching experience to be undertaken wholly or mainly in Wales in certain subject areas if a school or educational institution had to meet national curriculum requirements. They

also considered that this requirement could be seen to be suggesting that practical experience of teaching the Welsh Curriculum was essential for those teachers trained in Wales to be able to practise as a teacher and that such an approach would undermine the values and importance of transferable skills and portability of employment. They felt that pedagogic principles and practice as well as subject knowledge and understanding were more important than practical experience of teaching the Welsh Curriculum. They also considered that the proposal did not sit well with the fact that teachers trained outside Wales without covering the Welsh curriculum could be recognised as teachers in Wales.

How we are planning to address these

3.1.7 Many of the comments about the position of independent schools seem to be based on a misapprehension, as the part of the qualification regulations requiring a period of practical teaching experience for those qualifying as a teacher on ITT courses in Wales relates only to courses run through higher education institutions. This particular proposed change would not cover employment-based teacher training programmes, provision for which is covered in a separate scheme and policy and procedures documents issued under the scheme. The proposal also does not change the position of induction for newly qualified teachers, which is covered in separate regulations.

3.1.8 We are proposing that the requirement that the period of practical teaching experience would need to be undertaken wholly or mainly in a school or other educational institution in Wales which meets the national curriculum requirements should be implemented in a flexible way. The proposal is that the element of the national curriculum needed to be taught (in relation to the foundation phase, or the second, third or fourth key stages) would be that appropriate to the school or educational institution; and correspond with and be appropriate to the ITT course.

3.1.9 The phrase “wholly or mainly” in respect of the period of practical teaching experience has been in qualification regulations since September 2003. A specific definition or a set proportion has not been felt appropriate as there is a statutory requirement for all ITT providers to ensure that training takes account of individual training needs. Advice on this issue is included in “Becoming a Qualified Teacher: Handbook of Guidance”, Circular No. 017/2009, in sections R2.1 (programme design) and R2.5 (time in school).

3.1.10 Both the present and proposed legislation refers to practical teaching experience being undertaken wholly or mainly in Wales in a school or educational institution, so if it were felt to be appropriate an ITT provider could consider placements in FE colleges in some circumstances for the purposes of part of the practical teaching experience. However, ITT providers would need to ensure that any training outside maintained schools in Wales contributed to a trainee’s ability to meet the QTS Standards and did not adversely affect the remainder of the training programme. Similarly, ITT providers could arrange for trainees to spend some time in a PRU as an adjunct to an ITT programme. However, a PRU is specifically excluded from the required period of practical teaching experience being undertaken wholly or mainly in Wales as its specific provision cannot fully enable a trainee to demonstrate that they to meet the QTS Standards.

3.1.11 We do not think that there would be any difficulties for ITT providers in organising for practical teaching experience to be undertaken wholly or mainly in Wales. The vast majority of such practical teaching experience already takes place in maintained schools in Wales, which by definition have to meet national curriculum requirements. No responses on this issue were received from ITT providers.

3.1.12 One of the central features of the QTS Standards are requirements relating to the curriculum. Trainees must demonstrate that they have a secure knowledge and understanding of the subject(s) and the curriculum that they are trained to teach. They must also show that they can teach competently and independently the required or expected skills, knowledge, and understanding relevant to the curriculum for learners in the age range for which they are trained, and practical teaching experience is an essential element here. These legal requirements have been in place for many years, as has the statutory Welsh Curriculum.

3.1.13 As the consultation document noted, under the current provisions ITT providers would need to ensure that a significant proportion of trainees' practical teaching experience took place in schools delivering the national curriculum in order to meet their obligations under the statutory requirements for ITT courses (to design the content, structure and delivery of training to enable trainee teachers to demonstrate that they have met the statutory QTS Standards). The proposed provision would set out the position more prominently, for the avoidance of doubt.

3.1.14 We do not believe that such an approach would undermine the values and importance of transferable skills and portability of employment. As stated, it is essentially a clearer reflection of an existing position. QTS obtained in Wales through ITT courses run through higher education institutions in Wales are recognised elsewhere in the UK and in the EU and this position would not be affected by this proposal.

3.1.15 Many countries recognise qualifications obtained in other countries as equivalent in value, although they will not match in every respect. Clearly teachers trained outside Wales who come to work here will not have covered the Welsh curriculum on their courses, but it would be a perverse approach to suggest that this meant that specific Welsh elements such as the curriculum ought not to be covered on courses in Wales.

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 covers 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);**
- (iii) successful completion of a period of training on an employment-based teacher training scheme in England.**

Do you agree with this?

Points raised

3.2.1 Twelve of the fifteen organisations who commented on this question agreed with this proposal, one disagreed with part of the proposal and agreed with another part, and three were unsure. One of the organisations which agreed with the proposal suggested in the response to another question that they might disagree with part of it. Twelve of the fourteen individuals who responded disagreed with this proposal and two were unsure.

3.2.2 None of the responses received from General Teaching Councils disagreed with the proposal. The General Teaching Council for Wales felt it was sensible in the light of the teacher supply situation and the fact that FE teachers may now teach vocational subjects in maintained schools in Wales as part of local curricula under the Learning and Skills (Wales) Measure 2009. The General Teaching Council for Scotland recorded a 'not sure' but noted that their requirements are currently more restrictive than this proposal, only accepting teachers from the English system who have successfully completed route (i); there was a possibility for future accreditation of specific Graduate Teacher Programmes (route (iii)) which meet Scottish requirements. The GTCNI felt that the categories identified were reasonable and consistent with the approach taken by it in Northern Ireland.

3.2.3 One organisation agreeing with the proposal said that it was important that the exemptions given under the Education (Specified Work and Registration) (Wales) Regulations 2010 were clear on the distinction between those qualified FE teachers that can teach in schools in an unrestricted way, and those that cannot. The same organisation suggested in response to another question that fully qualified teachers from a number of other countries such as some commonwealth countries should be able to teach in schools as qualified teachers without undertaking further training or assessment.

3.2.4 One organisation which was unsure had concerns about the inclusion of the Assessment Only route at point (ii) and sought assurances that this route was sufficiently rigorous in terms of standards for successful teaching practice.

3.2.5 Another organisation which was unsure whether the proposed change to specific qualifications would limit that ability of appropriately qualified teachers to

move freely between teaching in Wales and England in any way. They felt that ability should be protected.

3.2.6 One organisation agreed with the proposal in respect of not recognising FE teachers holding QTLS status as qualified teachers in Wales. Their view was that QTS should remain as the qualification for teachers working in the school setting.

3.2.7 The same organisation disagreed with the proposal to the extent that it would have the effect that teachers with full qualifications from Australia, Canada, New Zealand and the United States (who under plans for changes announced by the Department for Education would become qualified teachers in England) would not be recognised as qualified teachers in Wales. They felt that there was no objectively justifiable reason for this restriction and were not happy that teachers from countries outside the European Economic Area or Switzerland would be required to undertake further training and assessment. They also felt that there should be proof that standards and quality levels required in overseas countries did not measure up to the QTS Standards.

3.2.8 The individuals who disagreed with the proposal felt that there should be a unified approach to teacher qualifications between the UK nations. Several argued that overseas teaching qualifications should be accepted. One argued that Welsh qualified teachers could teach in England so the same should apply the other way round. One suggested that the proposal would be discriminatory in respect of EU employment legislation.

How we are planning to address these

3.2.9 On the issue of what FE teachers can currently do in maintained schools in Wales, the consultation document noted that the Education (Specified Work and Registration) (Wales) Regulations 2010 (“the specified work regulations”) already allow qualified FE teachers to undertake teaching work in maintained schools in Wales in certain circumstances. The specified work regulations are clear about the circumstances under which this could take place: the teaching work under this particular provision must be one which involves the delivery of vocational courses of study forming a part or the whole of a local curriculum under the Learning and Skills (Wales) Measure 2009. A local curriculum is one which has been formed by a local authority under section 116A of the Education Act 2002 (for 14 to 16 year olds); or by the Welsh Ministers under section 33A of the Learning and Skills Act 2000 (for 16 to 18 year olds). Essentially, this provision allows qualified FE teachers to undertake aspects of FE teaching in relation to vocational courses within a maintained school.

3.2.10 The specified work regulations provide another option for FE teachers to undertake teaching work in maintained schools in Wales, although it is not specifically limited to FE teachers. Persons with “special qualifications or special experience” may teach any art or skill, or any subject, in maintained schools in Wales where special qualifications or special experience or both are required in order to do this. However, this is only permissible if no suitable teacher with QTS or teacher on the employment based teacher training scheme is available for such appointment (or in the case of the delivery of vocational courses of study forming a part or the whole of a local curriculum, no suitable qualified FE teacher), and only for

as long as that situation persists. The relevant school or local authority has to be satisfied as to the person's qualifications and/or experience.

3.2.11 The replacement of the provision whereby any person who is a qualified teacher in England is also a qualified teacher in Wales with a more specific provision which only covers certain categories of persons qualifying in England has been phrased to represent all the routes to QTS which are currently recognised. The Assessment Only route involves a specific assessment of individuals against the same QTS standards in England to which other routes are subject.

3.2.12 The proposed change would not limit that ability of currently qualified teachers to move freely between teaching in Wales and England, nor would it affect future qualifiers by routes currently accepted. The only limitation would be on any teachers deemed qualified in situations not in current legislation. As noted in the consultation document, if our proposed updated qualifications regulations and the changes presently proposed by the Department for Education in England were implemented, it would mean that teachers with full qualifications from Australia, Canada, New Zealand and the United States would have QTS in England and would be able to teach in schools there as qualified teachers. However, they would not be recognised as qualified teachers in Wales.

3.2.13 The proposed change would also mean that Welsh qualified teachers who can teach in England will have gained QTS on routes that are also accepted in Wales for English qualified teachers. This is no change from the present situation.

3.2.14 The consultation paper is clear that some overseas countries may have initial teacher training systems and teaching qualifications with comparable standards and quality levels to the UK. However, we were clear that although this might provide an indicator of the relative suitability of teachers from those countries for teaching in the UK, would not regard it as meaning that a teaching qualification from those countries could be viewed as fully equivalent in relation to the requirements in the QTS Standards.

3.2.15 One of the principal elements of the QTS Standards is that they require that trainees on ITT courses must demonstrate that they have a secure knowledge and understanding of the curriculum they are trained to teach. There are a number of Wales-specific elements to the curriculum, some of which are specifically covered in the QTS Standards, including Welsh Language Development in the Foundation Phase; sufficient understanding of Welsh as a second language to be able to teach it in Key Stage 2; as relevant to the age range they are trained to teach, they understand that, in Wales, that learners aged 7-14 should be given opportunities, where appropriate, to develop and apply their knowledge and understanding of the cultural, economic, environmental, historical and linguistic characteristics of Wales (the Curriculum Cymreig); and that learners aged 14-19 should have opportunities for active engagement in understanding the political, social, economic and cultural aspects of Wales as part of the world as a whole (Wales, Europe and the World). We think, therefore, that overseas trained teachers should not be able to teach in schools in Wales as qualified teachers on a long-term basis without a process leading to assessment against the QTS Standards.

3.2.16 The proposal would mean that teachers from countries outside the European Economic Area or Switzerland would be required to undertake further training and assessment. However, this is also the position at present, so there would be no change in this situation.

3.2.17 There have been differences in the approach to teacher qualifications between the UK nations for many years now. As noted in paragraph 3.2.2, for example, Scotland does not accept teachers who have gained QTS through employment-based teacher training routes such as the Graduate Teacher Programme. These differences can reflect particular approaches to teacher qualification and to education generally, which the UK nations are free to pursue and which reflect priorities in those countries. In this particular case the proposal would relate only to England as another part of the UK and would not impact on other Member States.

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?

Points raised

3.3.1 Thirteen of the fifteen organisations who commented on this question agreed with this proposal, one disagreed, and one was unsure. Thirteen of the fourteen individuals who responded disagreed with this proposal and one was unsure.

3.3.2 The organisations which responded supporting this proposal included the General Teaching Council for Scotland, the GTCNI and the Department of Education, Northern Ireland. The General Teaching Council for Wales fully supported the introduction of this provision.

3.3.3 The organisation which disagreed with this proposal felt it was about employability rather than the suitability of teaching qualifications. It suggested that the proposal was not logical as the same requirement was not placed on overseas teachers who were granted QTS in England, and felt it could be open to legal challenge.

3.3.4 The individuals who disagreed with the proposal felt that a QTS gained in one part of the UK should be accepted in all other parts of the UK. Views included that where training was undertaken was not important and that the best teachers should be able to teach anywhere, and that the proposal would limit inward movement of talent. One respondent thought the proposal could be read as suggesting that teacher training was not as effective in Scotland or Northern Ireland as in Wales.

How we are planning to address these

3.3.5 Teachers qualifying in Scotland and Northern Ireland are recognised as qualified teachers in Wales through two routes: those qualifying through ITT courses in those countries, and those qualifying through recognition by the appropriate authorities in those countries. The proposal being consulted on only relates to the latter route. It appears possible for overseas trained teachers to gain prior recognition by the appropriate authorities as a teacher in Scotland or Northern Ireland without having taught in those countries and without having undertaken ITT there.

3.3.6 In order to gain full registration with the General Teaching Council for Scotland, teachers are required to complete a period of probationary service of at least 60 days working in a school in that country. We think that for teachers relying on recognition by the General Teaching Council for Scotland as an entry to qualified teaching in Wales, it is reasonable to insist on this recognition being at this full registration level. We also think it reasonable that the same 60 days' working requirement should apply to teachers relying on recognition by the appropriate authorities as a teacher in Northern Ireland.

3.3.7 This type of requirement would not apply to teachers gaining QTS in England, as there is not an equivalent separate route there for qualifying through recognition by the appropriate authorities. Outside of those qualifying elsewhere in the UK or the European Economic Area or Switzerland, QTS in England at present can only be gained by routes already recognised in Wales and also similarly recognised in respect of Scotland or Northern Ireland. The proposed addition in England of recognition for teachers with full qualifications from Australia, Canada, New Zealand and the United States would enable them to teach in schools in England as qualified teachers without undertaking any further training or assessment, and the function of the new Teaching Agency would be simply to verify individuals' overseas teaching qualification on production of a letter from the relevant overseas authority.

3.3.8 As noted in paragraph 3.2.17, there are already long-standing differences in the approach to teacher qualifications between the UK nations. The requirement in relation to those relying on recognition by the General Teaching Council for Scotland as an entry to qualified teaching in Wales reflects the practice in Scotland itself, and just sets a parallel standard for those registered with the GTCNI.

3.3.9 The proposal does not reflect on ITT in Scotland and Northern Ireland: persons who have successfully completed an ITT course at an educational institution in Scotland or Northern Ireland are recognised as qualified teachers in Wales and this recognition will continue. The proposal only relates to those who gain registration with the respective General Teaching Councils outside of completing ITT in those countries.

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?

Points raised

3.4.1 Eleven of the fifteen organisations who commented on this question agreed with this proposal and four were unsure. One of the fourteen individuals who responded agreed with this proposal, eight disagreed and five were unsure.

3.4.2 The GTCNI commented that this proposal recognised and reflected changes in Northern Ireland and was welcomed by the Council. The General Teaching Council for Wales supported this proposal, saying that it would bring consistency with the existing approach for teachers from Scotland.

3.4.3 One organisation which was unsure indicated that this was a reflection of whether the GTCNI would continue in existence, given the abolition of the General Teaching Council for England. However, it added that as long as the GTCNI exists, and is operating to current standards, this proposal was sensible.

3.4.4 Another organisation which was unsure thought that this matter should be discussed with the devolved administration in Northern Ireland. It suggested that the proposal in the additional information document (that teachers entitled to practise in the United Kingdom under the European Communities (Recognition of Professional Qualifications) Regulations 2007 are recognised as qualified teachers, and must receive written notification from the Welsh Ministers or the GTCW to this effect) was a more appropriate approach.

3.4.5 The individuals who disagreed with the proposal made a variety of points. One took the view that the general teaching councils have failed and queried whether they were needed as in their view they offered little and cost a lot. Another said that if a teacher was trained in Northern Ireland they should be allowed to undertake induction anywhere in the UK. A further individual commented that if persons were qualified teachers, registration did not matter and would not make them better teachers.

3.4.6 One individual who was not sure commented that if the standards for recognition in Northern Ireland were equivalent to the rest of the UK then those skills should be recognised within the UK. Another suggested that this did not have anything to do with Wales.

How we are planning to address these

3.4.7 The GTCNI is operational and there are no current proposals which suggest that it would not continue in existence. Recognition of registration with the GTCNI is a factual necessity.

3.4.8 Both the Department of Education, Northern Ireland and the GTCNI were consulted about this proposal. Both were in agreement. The process for recognition of teachers entitled to practise in the United Kingdom under the European Communities (Recognition of Professional Qualifications) Regulations 2007 applies to countries outside the UK; the legislation does not apply within the UK.

3.4.9 We note views about the general teaching councils but since (in this instance) the GTCNI exists we need to take that into account. Similarly, there may be views about the value of registration, but registration with the GTCNI is a requirement and our proposal reflects its existence. This proposal would not prevent someone trained in Northern Ireland from undertaking induction in Wales, providing they met the separate induction requirements.

3.4.10 The proposal reflects requirements which apply in Northern Ireland and has been welcomed by the authorities there. It relates to Wales because it covers one of the categories of teachers who qualify elsewhere and who, if they wished to work in Wales, we are indicating would be recognised as a teacher here.

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?

Points raised

3.5.1 Eleven of the fifteen organisations who commented on this question agreed with this proposal, two were unsure and two disagreed. One of the fourteen individuals who responded agreed with this proposal, thirteen disagreed and one was unsure.

3.5.2 The General Teaching Council for Wales noted that since 2003 they had only confirmed QTS to two teachers through this provision. As such, the Council believed that there had been ample time and opportunity for such persons to seek recognition. Another organisation noted that this seemed to be a largely historical matter and that there was clear rationale for the proposed change.

3.5.3 One organisation which was unsure said that it was difficult to comment without knowing the numbers involved. It thought that if take up was small and decreasing, then it might be acceptable to allow the provision to run down. However, it felt in principle that it would make a more consistent approach if there were no anomalies in which teachers could achieve QTS beyond standard methods. Another organisation which was not sure acknowledged that the numbers who have made use of the provision in recent years is small, but said that it would need to be satisfied that no disadvantage or discrimination would ensue if the provision was discontinued in Wales.

3.5.4 One organisation which disagreed said that they needed further clarification on this point as to qualifications and subjects before they could make an informed

judgment. The other organisation which disagreed said that the present provisions should remain as they are for FE teachers.

3.5.5 The individuals who disagreed with the proposal made a variety of points. One individual said that a change in legislation was not needed as with increasingly lower numbers involved the issue would disappear soon.

3.5.6 One individual suggested that as teachers moved between the independent and state sector and that the teaching skills required, the proposal appeared discriminatory. Another added that experienced teachers from independent schools were likely to have real skills to offer in any school and that Wales should enable recruitment of these teachers to maintained schools.

3.5.7 Three individuals said that the proposal was ageist and discriminatory. One of these queried the relevance of the dates and another said that it should not matter when people trained.

How we are planning to address these

3.5.8 The current provision allows for qualification as a teacher by certain independent school or FE teachers who gained qualifications before 1974, or 1989 in certain subjects. Before then, those gaining education qualifications became qualified teachers if their first posts were in a maintained school, but not if they were in FE colleges or independent schools. Subsequently, the gaining of QTS was linked to undertaking particular ITT courses.

3.5.9 This provision only applies to this group because the issue only potentially affected people who trained before those dates. Teachers who currently work in independent schools or FE institutions but who have QTS are unaffected by this issue.

3.5.10 As indicated in the consultation document, this option has been available in Wales for some 9 years and the number who have made use of it is small. The General Teaching Council for Wales has confirmed that in that time they have only confirmed QTS to two teachers through this provision.

3.5.11 Anyone in this group completed their courses 23 years ago (for some courses) or 38 years ago (in others). For those who have not previously moved to the maintained sector, we think that this is too big a gap to be allowed to take up teaching in the maintained sector without an assessment of standards. This is particularly so given that the General Teaching Council for Wales have introduced a new requirement that from 1 September 2012, any qualified teacher seeking to return to the teaching profession in Wales after a break of five years or more will need to meet the Council's "Returning to Teaching" criteria.

3.5.12 In the circumstances, continuing this non-standard option for such miniscule numbers and where there are alternatives to gaining QTS is not viewed as a viable proposition.

Additional information matter: we are proposing to provide in an updated replacement for the 2004 Regulations that persons who as respects the profession of school teacher are entitled to practise in the United Kingdom pursuant to Part 2 and Chapters 1, 2 and 4 of Part 3 of the European Communities (Recognition of Professional Qualifications) Regulations 2007 are qualified teachers, and must receive written notification from the Welsh Ministers or the GTCW to this effect.

Points raised

3.6.1 The General Teaching Council for Wales supported this proposal, noting that in practice it already operates in this way as part of its role as 'competent authority' under the 2007 Regulations. One other organisation supported the proposal. No other responses on this issue were raised.

How we are planning to address these

3.6.2 We propose to proceed with this technical change, which just will reflect existing practice.

4. General comments not directly related to specific questions asked

Points raised

4.1 One organisation raise an issue about the Education (Specified Work and Registration) (Wales) Regulations 2010, saying that whilst these regulations allow qualified FE teachers to deliver vocational courses in maintained schools, they believed that this should be extended to academic subjects. They thought that qualified FE teachers should be allowed to teach in schools on the same basis that overseas trained teachers are allowed.

4.2 One organisation asked for the production of an impact assessment statement. They also felt that there should be proof that standards and quality levels required in overseas countries did not measure up to ITT in Wales or the QTS Standards.

4.3 One response said that there should be a requirement for trainees to learn about and make the most of outdoor as well as the indoor environment for effective learning at all levels from the Foundation Phase through to, and including, Key Stage 4.

4.4 Several responses touched on issues related to what they felt were the exclusion of teachers in independent schools. One individual said that they disagreed with the proposals because they felt that they would prevent any newly qualified teacher from ever being employed in an independent school in Wales if the school did not follow the Welsh curriculum. Another individual said that it was not sensible to exclude teachers because the school they work in did not follow the Welsh curriculum as this would not encourage talented teachers, and suggested that Welsh and the Welsh curriculum was not relevant in schools with pupils from other countries. A further individual added that it was not necessary for newly qualified teachers to complete induction in a Welsh school where Welsh was compulsory and that this could cause teachers to leave Wales for England. Another said that teachers in independent schools or FE were being excluded from the replacement regulations and that the proposals were discriminatory.

4.5 Two individuals raised the issue of teachers at an independent school who undertook training on the Graduate Teacher Programme (“GTP”) in order to gain QTS, but who were subsequently not able to complete induction in the school as it did not have compulsory Welsh. One said that compulsory Welsh would be of little value to the many international pupils and that not allowing these teachers to complete their induction year was tantamount to dishonesty when the Welsh Government had approved the GTP place. The other made similar points, adding that regulations had been changed following the approved GTP place and that this was the reason why they were unable to undertake induction in the school.

How we are planning to address these

4.6 The current consultation does not cover the Education (Specified Work and Registration) (Wales) Regulations 2010. In relation to recognition as a qualified teacher, we are not proposing that either overseas trained teachers or qualified FE teachers should be so recognised. The position of overseas trained teachers is covered in paragraphs 3.2.14-3.2.15 and issues about what qualified FE teachers can currently do in maintained schools in Wales are covered in paragraphs 3.2.9-3.2.10.

4.7 We intend to publish an impact assessment statement. The issue of overseas countries in relation to ITT and the QTS Standards is covered in paragraphs 3.2.14-3.2.15.

4.8 Issues about what trainees might be required to cover on ITT courses would be set out in the QTS Standards, but those are not covered by the current consultation. The Foundation Phase already places great importance on practitioners using the outdoors as another learning environment where children can work on a daily basis. The present QTS Standards requires trainees to be able to plan opportunities for those they teach to learn in out-of-school contexts, such as field-work.

4.9 Responses from individuals appeared to be based on a misapprehension. The regulations being consulted on only relate to the recognition of persons as a qualified teacher. They impose no requirements in relation to the induction of newly qualified teachers: these are covered in the separate Education (Induction Arrangements for School Teachers) (Wales) Regulations 2005. As noted in paragraph 3.1.7, the provision being consulted in relation to the period of practical teaching experience on ITT courses being undertaken wholly or mainly in a school or other educational institution in Wales which meets the national curriculum requirements relates only to courses run through higher education institutions. The ending of the current provision which allows for qualification as a teacher by certain independent school or FE teachers who gained qualifications before 1974, or 1989 in certain subjects, is a qualification route used by only two teachers since 2003.

4.10 In relation to the GTP, the regulations being consulted on do not relate to employment-based training programmes such as that. The provision regarding curriculum requirements where persons serve an induction period in an independent school are set out in the Education (Induction Arrangements for School Teachers) (Wales) Regulations 2005. Those provisions have been in place since 2005 and have not been changed; in the cases referred to, the school in question changed its curriculum requirements after the GTP places had been agreed.

5. The way forward

5.1 Having considered fully the responses received during consultation, the Minister for Education and Skills has decided to make updated school teachers' qualifications regulations with the changes set out in the consultation document and the additional information note.

5.2 The intention is that the new regulations would take effect from 1 April 2012.

Annex A: List of respondees

Organisations

Association of School and College Leaders Cymru
ATL – The Association of Teachers and Lecturers
Caerphilly County Borough Council
Cathedral School, Cardiff
Department of Education Northern Ireland
Estyn
General Teaching Council for Northern Ireland
General Teaching Council for Scotland
General Teaching Council for Wales
National Association of Head Teachers Cymru
NASUWT Cymru
National Union of Teachers Cymru
Undeb Cenedlaethol Athrawon Cymru (UCAC)
University and College Union Cymru

There were also two responses from organisations which did not wish to be identified.

Individuals

Bathie, A P – Rydal Penrhos Independent School, Colwyn Bay
Baxter, Phil – Rydal Penrhos Independent School, Colwyn Bay
Bennett, Mathew – Rydal Penrhos Independent School, Colwyn Bay
Proudlove, Ben – Rydal Penrhos Independent School, Colwyn Bay
Proudlove, Christopher
Proudlove, Irene – Rydal Penrhos Independent School, Colwyn Bay

There were also eight responses from individuals who did not wish to be identified.

Annex B: Published responses

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:	mbennett@rydal-penrhos.com
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:	improudlove@rydal-penrhos.com
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 in appropriate 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:	pbaxter@rydal-penrhos.com
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:	apbathie@rydal-penrhos.com
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.

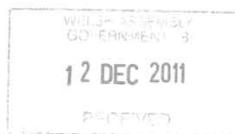
Q5:	Disagree
Comments:	<p>This is madness as independent schools are, in general, likely to score highly when Estyn inspected. Therefore any experienced teacher from those schools is likely to have real skills to offer in any school. With the pension changes coming in Wales is going to have to recruit 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:	BJProudlove@Rydal-Penrhos.com
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

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

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?

Agree	√ <input type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<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.

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

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: 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

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

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.

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

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

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"/>
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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
02920 465 000

Your address: 1st 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

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	X	Disagree		Not sure	
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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?

Agree		Disagree		Not sure	X
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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.

Agree	X	Disagree		Not sure	
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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	X	Disagree		Not sure	
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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		Disagree	X	Not sure	
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Comments:
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/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

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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:

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.

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- (xviii) 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:

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:

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

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:	chris.proudlove@gmail.com
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:	anna.brychan@naht.org.uk
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

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

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:

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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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.

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

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

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.

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

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

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

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

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure	<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
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:	peter.o'neill@deni.gov.uk
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
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"/>
-------	-------------------------------------	----------	--------------------------	----------	--------------------------

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.

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

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

Comments:
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?

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

Comments:
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 or 029 20460 099

Your address: 9th 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

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:

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?

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

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

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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<p>Comments:</p> <p>The Council supports this proposal, bringing consistency with the existing wording of the 2004 Regulations for teachers from Scotland.</p>

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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<p>Comments:</p> <p>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.</p>
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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 13th 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: