

**SUMMARY OF RESPONSES TO THE CONSULTATION ON REGULATIONS RELATING TO TEACHERS' WORK AND QUALIFICATIONS**

The consultation ran from 26 November 2003 to 6 February 2004. 26 responses were received in total. Respondents were:

- Secondary Heads Association (SHA) Cymru
- Mr M D Pickard, Headteacher, Blackwood Comprehensive School
- Mr D Farmer, Headteacher, Ysgol Glan Gele, Abergele
- Welsh Secondary Schools Association (WSSA)
- National Association of Head Teachers (NAHT)
- Association of Teachers and Lecturers (ATL)
- General Teaching Council for England (GTCE)
- Representatives of Wales Primary Schools Association (WPSA)
- AN Other (did not want to be identified)
- Caerphilly LEA
- Wrexham LEA
- Free Church Council of Wales
- General Teaching Council for Scotland (GTCS)
- Department of Education, University of Wales, Swansea
- Cardiff School of Education (UWIC)
- Wales TUC
- National Association of Schoolmasters and Union of Women Teachers (NASUWT) Cymru
- National Union of Teachers (NUT) Cymru
- GMB
- Department for Education and Skills (DfES), School Workforce Unit
- Undeb Cenedlaethol Athrawon Cymru (UCAC)
- UNISON
- Newport LEA

- General Teaching Council for Northern Ireland (GTCNI)
- General Teaching Council for Wales (GTCW)
- Governors Wales

### (1) THE EDUCATION (SPECIFIED WORK AND REGISTRATION) (WALES) REGULATIONS 2004

Respondent	Proposal
	<b>1. Do you agree that 'teaching work' should be defined more exactly, and the proposed listed activities (regulation 6)?</b>
SHA Cymru	Yes
M D Pickard	Yes - right that teachers should focus on teaching and learning but it cannot happen overnight and it must be properly funded.
D Farmer	No - do not agree with the compartmentalising of teachers' work into discrete elements, ie 'specified work' and the rest of the 'duties that may be required of a teacher'. The danger in specifying teaching as a list of tasks is that it takes away the professionalism of the job.
WSSA	Yes - regulation 6 is clear and helpful. Its scope is properly defined in context.
NAHT	Yes
ATL	Yes. But consider that some uses of ICT would circumvent the purpose of Regulation 6 in providing an effective guarantee, since that only applies to work taking place in a school. Regulation 6(2) covers only one of four activities within the definition of specified work, which means that work in planning, assessing and reporting could be outside the scope of the regulations if conducted via ICT outside the school. Propose that Regulation 6(2) be amended so the same principle also covers 6(1) (a), (c) and (d).
GTCE	No comment.
WPSA	Yes - there should be a more detailed definition.
AN Other	Yes. More valuable to state the wider responsibilities which teachers should undertake and to identify more clearly those which <i>only</i> teachers should carry out.
Caerphilly LEA	Yes - vital for discrimination to be made between the role and work of the teacher and that of others working in schools.

Wrexham LEA	Clear need to define exactly 'teaching work' which reflects and safeguards the professional skills of teachers. The proposed list of activities reflects the aspects of teachers' duties that have the greatest impact on learning.
Free Church Council of Wales	Yes
GTCS	Yes. List is adequate but more explicit reference to knowledge of subject being taught and review/evaluation would be helpful.
Dept of Education - Univ of Wales, Swansea	Yes - they need to be carefully defined to distinguish between teachers and HLTAs.
Cardiff School of Education	Yes - agree if this results in teachers' job descriptions and expectations of them being more tightly defined, for example in relation to performance management and in a reduction of their administrative workload.
Wales TUC	Yes
NASUWT Cymru	Yes
NUT Cymru	No. Proposed regulations do not provide the assurance that qualified teachers and teaching assistants are distinct and cannot be interchangeable. Form of the regulations is to enable schools to appoint unqualified persons to undertake teaching roles so as to reduce the number of qualified teachers employed to work in the school and achieve expenditure savings. The effect will not be to raise standards but to dilute qualified teacher status. Only qualified teachers and those in the defined groups en route to qualified teacher status should be permitted to do 'specified work'. Regulations should clearly define support staff as persons having the role of supporting qualified teachers in doing 'specified work'.
GMB	Yes
DfES	No comment
UCAC	No. Only qualified teachers should undertake the 'specified work' . The activities listed are the most important duties that a teacher must fulfil in order to maintain standards. By allowing support staff to undertake 'specified work' there will be a specific role change within schools and standards will fall.
UNISON	Yes
Newport LEA	Yes - needs to be clarity in what work can only be undertaken by a qualified teacher, and what work can be undertaken by appropriate support staff.

GTCNI	Yes - but caution against over-simplification of what is essentially a holistic professional relationship between teacher and student. Teaching is a transformation process with an underlying moral purpose, and it is not philosophically or operationally consistent to reduce this process to defined 'specified work'. Professional engagement involves more than what is set out in regulation 6.
GTCW	Yes. Welcome attempts to clarify 'teaching work' but would wish to guard against taking an over-simplistic approach to defining 'specified work'. Definition must be relevant to all teachers. Particular concerns: activities listed do not necessarily fully reflect the professional judgement, behaviour and decision making qualities that teachers need to exercise on a daily basis - these functions are key elements of a qualified teacher's role and must be incorporated in the regulations; important also that teachers get adequate training to enable them to carry out their new leadership/supervisory roles in respect of support staff.
Governors Wales	Yes

Respondent	Proposal
	<b>2. Do you agree that specified work may only be carried out by qualified teachers; or by persons who are not qualified teachers who are listed at Schedule 2 to the Regulations?</b>
SHA Cymru	Yes
M D Pickard	Yes
D Farmer	No. Do not agree with the principle of unqualified persons of any other category being treated as equivalent to a qualified teacher. Would the other unqualified persons included in these regulations as able to carry out 'specified work' be registered with the GTCW - would they sign up to a Professional Code of Conduct?
WSSA	Yes
NAHT	Yes
ATL	Yes. The regulations should express a mandatory role for HLTA standards. Seek specific assurances from the Assembly Government about the timescale for review of this question in Wales, as have been given in England.
GTCE	No comment
WPSA	Yes - but concerned that headteachers will be manoeuvred by budgetary constraints into employing HLTAs for long term situations. Decision should not be for headteachers. Need regulations on the amount of time HLTAs should have responsibility for a class.

AN Other	Yes - helpful to have greater clarity of the subjects and areas of learning where the 'specified work' may be carried out by people other than qualified teachers in Schedule 2.
Caerphilly LEA	Yes - provided there are safeguards to ensure that pupils secure quality supervision by a person trained and equipped to maintain the momentum of learning in the classroom, including the skills of behaviour management and classroom organisation.
Wrexham LEA	Yes - but schools and parents must be convinced that persons carrying out 'specified work' other than qualified teachers have the necessary skills and expertise.
Free Church Council of Wales	No. Clarification of roles is only possible if 'specified work' is carried out by qualified teachers or those training to be qualified, otherwise the blurring of roles continues
GTCS	Yes. Accept the first three categories in schedule 2 but see no reason to treat trainees on the graduate or registered teacher programme any differently from other ITE students
Dept of Education Univ of Wales, Swansea	Yes. Some clarification regarding teachers in training under traditional programmes would be helpful.
Cardiff School of Education	Yes. All who are not qualified teachers but who are listed at Schedule 2 should only carry out 'specified work' under proper supervision, subject to the same conditions listed for 'other people'. Not clear why the first group of people, who are not qualified teachers, should not be subject to the same conditions as the second category, 'other people'.
Wales TUC	Yes
NASUWT Cymru	Yes - but believe it is essential to include specific reference to the position of student teachers, as per the relevant regulations in England.
NUT Cymru	No - as for 1.
GMB	Yes
DfES School Workforce Unit	No comment
UCAC	No - as for 1.
UNISON	Yes
Newport LEA	Yes

GTCNI	Yes - reservations about others who are not qualified teachers undertaking 'specified work'. Those identified in Schedule 2 must be capable of delivering to a professionally acceptable standard - raises significant monitoring and compliance issues.
GTCW	Yes. Use of people other than a qualified teacher to undertake 'specified work' should only be in 'exceptional circumstances', in accordance with Schedule 2. Support the requirement that all teachers undertaking 'specified work' must be registered with the GTCW, but draw attention to the fact that a person may be qualified and registered, but not in a qualified teacher post - ask for the wording to be revisited.
Governors Wales	Yes

<b>Respondent</b>	<b>Proposal</b>
	<b>3. Do you agree with the categories of people who may carry out specified work on the same basis as qualified teachers (Schedule 2, paras 2 - 7) and the changes proposed compared with the position under the 1999 Regulations?</b>
SHA Cymru	Yes. Treatment of students on ITT courses and those on graduate based routes appears anomalous. These students are in receipt of a training allowance and on a second practice may well be more experienced than trainees on the graduate route. Rather than include them with 'other persons' in para 8 it might give schools greater flexibility to include them in para 7 and rephrase it to refer to accredited teacher training schemes so that it applies equally to all ITT and employment based routes.
M Pickard	Yes
D Farmer	No - as for 2.
WSSA	Yes. It is misleading to assume that people with skills backgrounds relating to the contents of a particular course would be able to teach those courses. There should be no automatic acceptance of a teaching qualification from another country - there needs to be reliable vetting of background (police checks) and testing of language skills; LEA and/or governing body must ensure sufficient resource for monitoring and support.
NAHT	Yes
ATL	Yes
GTCE	No comments

WPSA	Para 8 of Schedule 2 leaves too much to interpretation and places too much responsibility on head teachers. 'Experience' cannot be measured to a nationally agreed standard. 'Head teacher' should be replaced by 'Governing Body', as responsible for appointing staff. HLTA skills and qualifications should be set out clearly.
A N Other	Yes. Subject specific references would be helpful; also those occasions where delegation of responsibility is not acceptable or appropriate.
Caerphilly LEA	Yes
Wrexham LEA	Places significant additional responsibility on head teachers in determining whether other persons carrying out 'specified work' have the necessary levels of skills and expertise; and has significant training implications.
Free Church Council of Wales	No. It would be very easy for a non-qualified teacher to start a 'limited period' post and for this to continue because of savings to the school by not employing a qualified teacher.
GTCS	As for 2.
Dept of Education - Univ of Wales, Swansea	Yes
Cardiff School of Education	All those who are not qualified teachers should be subject to certain conditions of supervision. Also needs noting that student teachers still get assessed by inspectors of ITET courses under the same criteria as qualified teachers. If they are classed as 'other people', is it not fair that they are assessed as such?
Wales TUC	Yes
NASUWT Cymru	Yes
NUT Cymru	No - as for 1.
GMB	Yes
DfES School Workforce Unit	No comment
UCAC	Acceptable for those listed in Schedule 2, paras 2, 4, 5, 6 and 7 <i>only</i> to undertake 'specified work'. <i>Not</i> acceptable for those listed in Schedule 2, paras 3 and 8 to undertake 'specified work'. Overseas trained teachers should receive training in the Welsh curriculum and Welsh school ethos.

UNISON	Yes
Newport LEA	Yes
GTCNI	No comment
GTCW	Yes. Ask Assembly to take steps to improve compliance by employers with the criteria in Schedule 2; to consider improving monitoring of 3(3) of Schedule 2 relevant to instructors; to reconsider title of the Registered Teacher Programme and all related references to 'registered teachers' in the regulations; to revisit the proposal to remove student teachers from the group in Schedule 2; and to provide more information in the associated guidance on what student teachers can do and how they are supervised.

Respondent	Proposal
	<b>Q4. Do you agree with the conditions under which 'other persons' may carry out 'specified work' to assist or support the work of a qualified teacher?</b>
SHA Cymru	Yes
M D Pickard	Yes
D Farmer	Yes - provided it does not lead to a reduction in the allocation of one qualified teacher to each class of no more than 30 primary pupils.
WSSA	Yes. Helpful if the recommendations under 3 were included in the guidance under para 17 - in particular 'teaching skills' should be added in 17(b).
NAHT	Yes
ATL	Yes. Prefer para 8 to be drafted so as to ensure arrangements for direction and supervision are suitable and sufficient on a case by case basis - current wording only requires a generic consideration by the head teacher of the 'work specified'. Also seek special provision for the supervision and direction of non-HLTA staff if they are engaged in higher levels of specified work - currently there is no assurance that limits higher level specified work to those with HLTA status.
GTCE	No comment
WPSA	No. Difficult to monitor standards; will increase teachers' workload; places too much responsibility on head teachers; contradictory explanations; more clarification needed - what is meant by 'under direct supervision'?



A N Other	Yes
Caerphilly LEA	Yes
Wrexham LEA	Vital that the class stays under the responsibility of a qualified teacher; also that training is available not only for support staff but also for teachers directing their work.
Free Church Council of Wales	No. 'Specified work' should only be carried out by qualified teachers.
GTCS	No comment.
Dept for Education - Univ of Wales, Swansea	Yes
Cardiff School of Education	Yes
Wales TUC	Yes
NASUWT Cymru	Yes, subject to the following: <ul style="list-style-type: none"> <li>- Inclusion in the Estyn inspection framework of the review of the use, deployment, qualifications and training of support staff undertaking specified work;</li> <li>- Introduction of a duty on LEAs to monitor the deployment of support staff and make regular returns to the Assembly Government;</li> <li>- Inclusion of this information in the data to be collected by WAMG [Workforce Agreement Monitoring Group - the signatories group overseeing implementation of the National Agreement on Raising Standards and Tackling Workload] as part of its role in monitoring implementation of the National Agreement.</li> </ul>
NUT Cymru	No - as for 1.
GMB	Yes
DfES School Workforce Unit	No comment
UCAC	No
UNISON	Yes

Newport LEA	Yes - but concerns that the regulations do not sufficiently emphasise the importance of maintaining the quality of teaching standards.
GTCNI	Yes
GTCW	Yes. Welcome the general principle but have some specific concerns: <ul style="list-style-type: none"> <li>• Some of the language, in particular the responsibility placed on head teachers in Schedule 2, 8 (b) and (c), is subjective and open to interpretation - could lead to blurring of the teacher' s role in individual cases;</li> <li>• There should be a set of standards for both HLTAs and other support staff doing 'specified work', and they should be statutory;</li> <li>• The reporting and supervisory lines of HLTAs and other support staff must be clearly defined.</li> </ul>
Governors Wales	Yes

## (2) ASSOCIATED GUIDANCE ON THE TEACHERS' SPECIFIED WORK REGULATIONS

<b>Respondent</b>	<b>Proposal</b>
	<b>5. Are you content with the (associated) guidance on the Teachers' Specified Work Regulations?</b>
SHA Cymru	Yes - guidance may need early review as the situation in schools evolves.
M D Pickard	Yes. Does the guidance mean that a teacher need not be timetabled to teach subjects outwith the core and other foundation subjects and RE?
D Farmer	Concerned that the burden of establishing a fair pay and conditions system for support staff should not be placed on, or left to the discretion of, individual schools and head teachers - there need to be nationally set arrangements.
WSSA	Yes. Reservation that 'other teachers' may not be subject to the system of supervision outlined in Part II for support staff.
NAHT	Yes
ATL	Yes
GTCE	No comment
WPSA	No - not enough detail.

AN Other	Yes
Caerphilly LEA	Yes. Helpful to have exemplar job descriptions for various support staff categories
Wrexham LEA	Guidance would benefit from exemplification with particular reference to the different phases and contexts within which pupils work.
Free Church Council for Wales	No - only qualified teachers should undertake 'specified work'.
GTCS	No comment
Dept for Education - Univ of Wales, Swansea	Yes
Cardiff School of Education	Yes - subject to previous comments.
Wales TUC	Yes. Guidance needs to clearly define support staff as supporting teaching staff.
NASUWT Cymru	Yes. Guidance needs strengthening in parts; it must address the issue of cover supervisors and be cross-referenced with the STPCD guidance; need also for greater clarity between direct and indirect supervision.
NUT Cymru	No. Seek changes to the guidance consistent with views expressed on the regulations. On specific points: do not accept that HLTAs may work with whole classes; assessing the development, progress and attainment of pupils is work for qualified teachers only; not appropriate to say teachers may 'delegate their activities to support staff; para 29 needs further attention - it suggests inexperienced teaching assistants who do not meet the HLTA standards might nonetheless be doing specified work; guidance is needed on the legal duty of care of support staff towards pupils, particularly on extra-curricular activities.
GMB	Yes. Prefer the phrase 'HLTA standards' not 'standards for HLTAs' - makes clearer that HLTA is a status not a job title.
DfES School Workforce Unit	No comment
UCAC	No. Only a qualified teacher should undertake 'specified work' - call on the NAW to make a stand on this. Specific points: only qualified teachers should work with whole classes; call on Assembly Government to ensure sufficient funding to allow qualified teachers to teach pupils in every lesson; support staff should not be in a class without a teacher's supervision; tasks in paras 38-47 add to a teacher's workload and undermine the beneficial contractual changes.

UNISON	Yes
Newport LEA	Yes. Would like to see greater emphasis on the importance of qualified teachers in maintaining the quality of teaching standards in schools.
GTCNI	Yes. Strongly support enhanced CRB disclosure for support staff.
GTCW	Yes. Guidance should be more specific on the duties that only a qualified teacher should do (para 13); too much responsibility placed on the head teacher in terms of assessing skills, expertise and experience of support staff - more clarification needed; HLTA standards should be statutory, and there should be equivalent standards for any other support staff doing 'specified work'.

### (3) STANDARDS FOR HIGHER LEVEL TEACHING ASSISTANTS

Respondent	Proposal
	<b>6. Are you content with the standards for Higher Level Teaching Assistants?</b>
SHA Cymru	Yes
M D Pickard	Standards are detailed and far reaching - major issues surround availability and cost of training and funding HLTAs.
D Farmer	No - range of questions need answering on, eg, links to other qualifications, training, pay etc.
WSSA	Yes
NAHT	Yes
ATL	Yes
GTCE	No comment.
WPSA	No. Standards need to be measurable and statutory. Who will be responsible for quality assurance? Who will train HLTAs?
AN Other	Yes - but need urgent guidance on suitable pay structure for HLTAs.
Caerphilly LEA	The standards are <i>very</i> demanding. Concern about what happens pending training for HLTAs - head teachers could be vulnerable to legal challenge if an incident occurred when pupils were supervised by an HLTA without a formal qualification.

Wrexham LEA	Yes. But three key concerns; on funding (including consistency of pay scales); the time available for HLTAs to engage in discussion with teachers; training and qualifications, including how to accredit for prior experience.
Free Church Council of Wales	No. An HLTA is not a qualified teacher and should not be used as such.
GTCS	Yes - but language in 3.3 could be interpreted as the role of the teacher, especially 3.3.6.
Dept of Education - Univ of Wales, Swansea	Yes
Cardiff School of Education	Yes. HLTAs will need to be properly trained; and a fair career and pay structure put in place for all support staff.
Wales TUC	Yes. Should be mandatory on head teachers to have regard to the HLTA standards.
NASUWT Cymru	Yes. Standards must be an integral part of a clear and cohesive career progression route for support staff; standards must be equivalent to England to allow for transferability; must be clear how standards relate to existing qualifications, eg CACHE, NNEB; mechanism for reviewing prior learning, experience and achievement must be clear; must be equality of access to training opportunities and targets for recruitment from under-represented groups; standards must be capable of measurement and assessment. Do not agree with requirement for HLTAs 'to carry out these activities through the medium of Welsh' - could be considered a de facto requirement for all HLTAs with unintended consequences for the supply of HLTAs in Wales.
NUT Cymru	No. All staff entitled to high quality training and professional development commensurate with their work, and ways to encourage teaching assistants to undertake teacher training are to be encouraged. But introduction of HLTAs is designed to provide education on the cheap - in many cases the standards approximate those expected of qualified teachers. Whole classes should only be taught by those with QTS, or those working to QTS. No recognition of the fact that it will likely be especially difficult for teaching assistants in Wales's many small schools to meet the proposed standards.
GMB	Yes. Welcome that standards in Wales will be comparable to those in England; keen that training arrangements are also mirrored with at least comparable levels of resourcing.
DfES School Workforce Unit	No comment
UCAC	No - standards undermine teachers' professionalism.

UNISON	Yes
Newport LEA	Yes - need more detailed guidance on experience, appropriate qualifications and training necessary for the post of HLTA.
GTCNI	Yes - but language in some cases encroaches on the domain of the teaching professional, eg in 3.3.
GTCW	Yes. Standards should be statutory otherwise in practice the quality of provision and delivery will be variable and difficult to monitor. Seek further clarification of meaning of statement that HLTAs will be 'operating at the equivalent of NVQ level 4' and further detail on plans for training of HLTAs and other support staff undertaking 'specified work'.
Governors Wales	Yes

#### (4) THE EDUCATION (SCHOOL TEACHERS' QUALIFICATIONS) (WALES) REGULATIONS 2004

PROPOSAL	RESPONSES
<p><b>7. Do you agree that a set of restated and updated regulations on qualifications would be appropriate?</b></p>	<ul style="list-style-type: none"> <li>All stated preferences in favour.</li> <li>GTCW notes the Assembly's proposal that the Council receives no additional funding to undertake the proposed expanded work in respect of the administration and recognition of QTS. The Council expects the additional work and, therefore, cost to be minimal but would wish to keep this under review</li> </ul> <p><i>In favour: Secondary Heads Association (Cymru), M D Pickard (Headteacher), D Farmer (Headteacher), Welsh Secondary Schools Association, General Teaching Council for England, Representatives of Wales Primary Schools Association, Caerphilly LEA, Wrexham LEA, Free Church Council of Wales, Newport LEA, General Teaching Council for Scotland, Dept of Education – University of Wales Swansea, Cardiff School of Education (UWIC), Wales TUC, NASUWT Cymru, UCAC, NUT Cymru, General Teaching Council for Wales, one other response.</i></p> <p><i>No preferences or comments: Association of Teachers &amp; Lecturers, General Teaching Council for Northern Ireland, DfES Initial Teacher Training Policy (School Workforce Unit), Governors Wales</i></p>

<p>8. Do you agree with the proposed key changes:-</p>	
<p>(a) <u>Recognition for those on initial teacher training courses in Wales to be qualified</u> - adding more detail to the definition of what is required for those on initial teacher training courses in Wales to be recognised as qualified teachers (Regulation 5 and Part 1 of Schedule 2)</p> <p><b>Detail:- Present requirements for QTS in Wales are:-</b></p> <ul style="list-style-type: none"> <li>• a person must hold a degree or equivalent qualification; and</li> <li>• must have successfully completed a course of initial training for teachers in schools at an accredited institution in Wales.</li> </ul> <p><b>Proposed new additional requirements:-</b></p> <ul style="list-style-type: none"> <li>• a person must hold a first degree</li> <li>• must be assessed by the accredited institution as meeting the QTS standards; and</li> <li>• students must have undertaken practical teaching experience wholly or mainly in Wales.</li> </ul>	<ul style="list-style-type: none"> <li>• Majority in favour overall</li> <li>• Proposal that to gain QTS a person must be assessed by the accredited institution as meeting the QTS standards – all in favour or no comments</li> <li>• Proposal that a person must hold a first degree – mostly in favour or no comments. Some reservations from GTCW: the Council commented that this proposal was to hold a degree only, rather than a degree or equivalent qualification granted by a UK institution or an equivalent degree, and viewed as a more narrow requirement.</li> <li>• Proposal that students must have undertaken practical teaching experience wholly or mainly in Wales had views both for and against, with slightly more for (general view that this supports teaching in Wales) than against (general view that this will reduce range of experiences for students and cause difficulties for ITT providers in border areas).</li> </ul> <p><b><i>In favour: Secondary Heads Association (Cymru), Welsh Secondary Schools Association, General Teaching Council for England, Caerphilly LEA, Newport LEA, General Teaching Council for Scotland, Dept of Education – University of Wales Swansea, Wales TUC, UCAC, General Teaching Council for Wales (re being assessed by the accredited institution as meeting the QTS standards), one other response</i></b></p> <p><b><i>Against (all these only against the proposal that students must have undertaken practical teaching experience wholly or mainly in Wales): Cardiff School of Education (UWIC), General Teaching Council for Wales, M D Pickard (Headteacher), D Farmer (Headteacher), Free Church Council of Wales, NUT Cymru</i></b></p> <p><b><i>No preferences or comments: Representatives of Wales Primary Schools Association, Wrexham LEA, DfES Initial Teacher Training Policy (School Workforce Unit), Governors Wales</i></b></p>

<p>(b) <u>Qualified Teacher Status for persons who first worked in independent schools or FE colleges</u> (Regulation 5 and Part 1 of Schedule 2)</p> <p><b>Detail:-</b> Adds some flexibility to considering QTS applications in this time-limited group by ending link between present establishment and past establishment.</p>	<ul style="list-style-type: none"> <li>• All stated preferences in favour.</li> <li>• UWIC felt that it would be simpler if any applications were processed via the proposed assessment only route.</li> <li>• DfES noted that this provision has been discontinued in England.</li> </ul> <p><b><u>In favour:</u></b> <i>Secondary Heads Association (Cymru), D Farmer (Headteacher), Welsh Secondary Schools Association, Caerphilly LEA, Newport LEA, General Teaching Council for Scotland, Dept of Education – University of Wales Swansea, Cardiff School of Education (UWIC), Wales TUC, UCAC, NUT Cymru, General Teaching Council for Wales, one other response</i></p> <p><b><u>No preferences or comments:</u></b> <i>M D Pickard (Headteacher), General Teaching Council for England, Representatives of Wales Primary Schools Association, Wrexham LEA, Free Church Council of Wales, DfES Initial Teacher Training Policy (School Workforce Unit), Governors Wales</i></p>
<p>(c) <u>Persons who may be recognised as qualified teachers</u> (Regulation 5 and Part 1 of Schedule 2)</p> <p><b>Detail:-</b> Adds power to recognise in cases where written notification under earlier regulations was not given; and allows qualification from such date as may be provided in notifications.</p>	<ul style="list-style-type: none"> <li>• All stated preferences in favour.</li> <li>• GTCW would like confirmation that a person who completed a programme of initial teacher training can be confirmed as having QTS and whether this can be back-dated to the actual completion/assessment date.</li> </ul> <p><b><u>In favour:</u></b> <i>Secondary Heads Association (Cymru), D Farmer (Headteacher), Welsh Secondary Schools Association, Caerphilly LEA, Newport LEA, General Teaching Council for Scotland, Dept of Education – University of Wales Swansea, Wales TUC, UCAC, NUT Cymru, General Teaching Council for Wales, one other response</i></p> <p><b><u>No preferences or comments:</u></b> <i>M D Pickard (Headteacher), General Teaching Council for England, Representatives of Wales Primary Schools Association, Wrexham LEA, Free Church Council of Wales, Cardiff School of Education (UWIC), DfES Initial Teacher Training Policy (School Workforce Unit), Governors Wales</i></p>



<p>(d) <u>Mandatory qualifications for teachers of pupils who are hearing impaired, visually impaired or both hearing impaired and visually impaired</u> (Regulations 6-9)</p> <p><b>Detail:-</b> Defines ‘teaching’ in terms of the work which is set out in the specified work regulations; deletes the words “otherwise than to give instruction in a craft, trade or domestic subject”; strengthens the three year allowance by requiring employers to be satisfied that a person is actually in the process of obtaining the relevant MQ.</p>	<ul style="list-style-type: none"> <li>• All stated preferences in favour.</li> <li>• GTCW raises a couple of queries about extending requirements into the SEN field and administrative process of keeping information on those seeking qualifications</li> </ul> <p><i>In favour: Secondary Heads Association (Cymru), D Farmer (Headteacher), Welsh Secondary Schools Association, General Teaching Council for England, Caerphilly LEA, Newport LEA, Free Church Council of Wales, General Teaching Council for Scotland, Dept of Education – University of Wales Swansea, Cardiff School of Education (UWIC), Wales TUC, UCAC, NUT Cymru, General Teaching Council for Wales, one other response</i></p> <p><i>No preferences or comments: M D Pickard (Headteacher), Representatives of Wales Primary Schools Association, Wrexham LEA, DfES Initial Teacher Training Policy (School Workforce Unit, Governors Wales)</i></p>
<p>(e) <u>Notification of qualified teacher status</u> (Regulation 10)</p> <p><b>Detail:-</b> widens the categories of those to whom the General Teaching Council for Wales must confirm QTS to include</p> <ul style="list-style-type: none"> <li>• people on the Graduate Teacher Programme</li> <li>• people on the Registered Teacher Programme</li> <li>• people on the employment-based teacher training scheme; and</li> <li>• independent schools teachers and further education teachers, in limited categories.</li> </ul>	<ul style="list-style-type: none"> <li>• All stated preferences in favour.</li> <li>• Some comments from GTCW, GTCE and DfES that GTCW’s proposed powers would not be equivalent to GTCE’s.</li> <li>• Some suggestions (GTCW, GTCE) that Assembly should not have alternate powers alongside GTCW.</li> </ul> <p><i>In favour: Secondary Heads Association (Cymru), D Farmer (Headteacher), Welsh Secondary Schools Association, General Teaching Council for England (with some reservations – see above), Caerphilly LEA, Newport LEA, General Teaching Council for Scotland, Dept of Education – University of Wales Swansea, Cardiff School of Education (UWIC), Wales TUC, UCAC, NUT Cymru, General Teaching Council for Wales (with some reservations – see above), one other response</i></p> <p><i>No preferences or comments: M D Pickard (Headteacher), Representatives of Wales Primary Schools Association, Wrexham LEA, Free Church Council of Wales, DfES Initial Teacher Training Policy (School Workforce Unit), Governors Wales</i></p>
<p>(f) <u>Accreditation of initial teacher training</u></p>	<ul style="list-style-type: none"> <li>• All stated preferences in favour.</li> </ul>

<p><u>providers</u> (Regulation 11)</p> <p><b>Detail:-</b> more specific provision enabling the Higher Education Funding Council for Wales to accredit institutions who satisfy criteria specified by the Assembly.</p>	<ul style="list-style-type: none"> <li>• Some queries (Free Church Council of Wales, Cardiff School of Education) about whether Assembly will change criteria.</li> <li>• Cardiff School of Education asked for ITT providers to be consulted as well as HEFCW.</li> <li>• GTCW noted that this role is not entirely consistent with HEFCW's core responsibilities.</li> </ul> <p><i>In favour: Secondary Heads Association (Cymru), D Farmer (Headteacher), Welsh Secondary Schools Association, General Teaching Council for England, Caerphilly LEA, Newport LEA, Free Church Council of Wales General Teaching Council for Scotland, Dept of Education – University of Wales, Swansea, Cardiff School of Education (UWIC), Wales TUC, UCAC, NUT Cymru, General Teaching Council for Wales, one other response</i></p> <p><i>No preferences or comments: M D Pickard (Headteacher), Representatives of Wales Primary Schools Association, Wrexham LEA, DfES Initial Teacher Training Policy (School Workforce Unit), Governors Wales</i></p>
<p>(g) <u>Employment based routes in to teaching</u> (Regulation 12)</p> <p><b>Detail:-</b> new provision allowing the Assembly to establish an employment based teacher training scheme, enabling a person to train to become a teacher whilst employed.</p>	<ul style="list-style-type: none"> <li>• All stated preferences in favour.</li> <li>• Some comments (Mr Farmer, Free Church Council of Wales, Dept of Education – University of Wales Swansea) stressing the need for suitable standards for quality control.</li> <li>• GTCW would like the title of the Registered Teacher Programme to be reconsidered to avoid possible confusion with the teacher registration</li> </ul> <p><i>In favour: Secondary Heads Association (Cymru), M D Pickard (Headteacher), D Farmer (Headteacher), Welsh Secondary Schools Association, General Teaching Council for England, Caerphilly LEA, Newport LEA, Free Church Council of Wales, General Teaching Council for Scotland, Dept of Education – University of Wales Swansea, Cardiff School of Education (UWIC), Wales TUC, UCAC, NUT Cymru, General Teaching Council for Wales, one other response</i></p> <p><i>No preferences or comments: Representatives of Wales Primary Schools</i></p>

	<p><i>Association, Wrexham LEA, DfES Initial Teacher Training Policy (School Workforce Unit, Governors Wales)</i></p>
<p>(h) <u>Overseas trained teachers</u> (Regulation 12):</p> <p><b>Detail:-</b> new provision permitting specific provision to be made in the employment based teacher training scheme referred to in (g) above which would allow overseas trained teachers to be assessed against the QTS standards without further training.</p>	<ul style="list-style-type: none"> <li>• All stated preferences in favour except one.</li> <li>• The Free Church Council of Wales mentioned the need for suitable standards for quality control.</li> <li>• Dept of Education, University of Wales Swansea does not agree – considers that all who gain QTS in Wales should learn about the educational distinctiveness of Wales.</li> </ul> <p><i><u>In favour:</u> Secondary Heads Association (Cymru), D Farmer (Headteacher), Welsh Secondary Schools Association, General Teaching Council for England, Caerphilly LEA, Newport LEA, Free Church Council of Wales, General Teaching Council for Scotland, Cardiff School of Education (UWIC), Wales TUC, UCAC, NUT Cymru, General Teaching Council for Wales, one other response</i></p> <p><i><u>Against:</u> Dept of Education – University of Wales Swansea</i></p> <p><i><u>No preferences or comments:</u> M D Pickard (Headteacher), Representatives of Wales Primary Schools Association, Wrexham LEA, DfES Initial Teacher Training Policy (School Workforce Unit, Governors Wales)</i></p>
<p>(i) <u>FE qualified teachers working in maintained schools</u> (Regulation 12)</p> <p><b>Detail:-</b> new provision which would permit specific provision to be made in the employment based teacher training scheme referred to in (g) above for persons with qualifications such as a PGCE(FE) to be assessed by a competent person to determine whether they meet the specified standards without undertaking further training if certain criteria are met.</p>	<ul style="list-style-type: none"> <li>• Although mostly in favour in principle, many comments have reservations or would like modifications to the draft regulation.</li> <li>• Concern from English counterparts that this proposal would put Wales out of step with England in an area – the mutual recognition of qualifications – that has worked to the benefit of both countries up until now. Suggest that it could damage perception of QTS in Wales as being equivalent to England.</li> <li>• GTCE emphasise that in England regulations have been strictly enforced and teachers with FE qualifications who do not meet the requirements for the award of QTS have been required to gain QTS via the GTP or an ITT course (including teachers who were erroneously employed due to incorrect interpretation of their qualifications). Recognise that QTS award requirements will be fulfilled but are concerned about suggesting that PGCE(FE) teachers should be treated</li> </ul>

	<p>differently to other teachers erroneously employed as qualified teachers.</p> <ul style="list-style-type: none"> <li>• Welsh Secondary Schools Association is content but would like assessment by two competent persons rather than one.</li> <li>• Free Church Council of Wales and GTCW are content but note that suitable standards for quality control needed.</li> <li>• GTCW also points to need to make clear that this is not a general route to QTS for FE teachers, but only in limited circumstances.</li> <li>• Dept of Education – University of Wales, Swansea is content, but only if the provision is limited to those who had worked in a maintained school for a significant period of time - possibly all or a substantial part of which should have been full-time.</li> </ul> <p><i><u>In favour:</u> Secondary Heads Association (Cymru), M D Pickard (Headteacher), Welsh Secondary Schools Association, General Teaching Council for England, Caerphilly LEA, Newport LEA, Free Church Council of Wales, General Teaching Council for Scotland, Dept of Education – University of Wales Swansea, Cardiff School of Education (UWIC), Wales TUC, UCAC, NUT Cymru, General Teaching Council for Wales, one other response</i></p> <p><i><u>Against:</u> GTCE, DfES Initial Teacher Training Policy (School Workforce Unit)</i></p> <p><i><u>No preferences or comments:</u> D Farmer (Headteacher), Representatives of Wales Primary Schools Association, Wrexham LEA, Governors Wales</i></p>
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**(5) THE GENERAL TEACHING COUNCIL FOR WALES (FUNCTIONS) (AMENDMENT) REGULATIONS 2004**

Respondent	Proposal	Proposal
	<p><b>8. Do you agree with the proposal to make provision for these teachers to be able to continue to be registered with the General Teaching Council for Wales pending the outcome of an appeal against failing Induction?</b></p>	<p><b>9. Do you agree with the minor amendments to the 2000 Regulations</b></p> <ul style="list-style-type: none"> <li>• enabling the Council to make its own provision as to the form and manner of applications for registration;</li> <li>• adding a diocesan authority and the Ministry of Defence as bodies to whom the Council is required to supply certain information;</li> <li>• requiring the Council to supply information to the General Teaching Council for Northern Ireland;</li> <li>• requiring the Council to supply information relating to school teachers' induction to appropriate bodies; and</li> <li>• restricting the particulars of academic and professional qualifications recorded on the register to qualifications that are relevant to employment as a teacher.</li> </ul>
SHA Cymru	Yes	Yes
M D Pickard	Yes	Yes
D Farmer	Yes – provided that they undertake further professional development and support provided by their school/LEA and that there should be reasonable time limits.	No comment
WSSA	Yes	Yes
NAHT	No comment	No comment
ATL	No comment	No comment
GTCE	No comment	No comment
WPSA	No - concerned that not upholding high standards of teaching. These teachers should not continue	Would need further information on 4 & 5

	to be registered.	<ul style="list-style-type: none"> <li>• requiring the Council to supply information relating to school teachers' induction to appropriate bodies; and</li> <li>• restricting the particulars of academic and professional qualifications recorded on the register to qualifications that are relevant to employment as a teacher.</li> </ul>
AN Other	Yes- but with agreed time limit of induction regulations	Yes
Caerphilly LEA	Yes	Yes
Wrexham LEA	This has implications for LEA/Schools on the employment of teachers. Advice needed on how to deal with teachers who fail induction. If an appointment is subject to completion of satisfactory induction, then the contract would need to be terminated if they fail. What happens if they appeal. Where does that leave the school, should they carry on pending the appeal or terminate.	Yes
Free Church Council of Wales	No comment	No comment
GTCS	Yes	Yes - not sure what information will be supplied to a diocesan authority or the Ministry of Defence.
Dept of Education - Univ of Wales Swansea	Yes	Yes - The last bullet (restricting the particulars of academic and professional qualifications recorded on the register to qualifications that are relevant to employment as a teacher) should be interpreted in its broadest sense.
Cardiff School of Education	Yes	Yes - not clear why the GTCNI is mentioned specifically and not the GTCE or GTCS.
Wales TUC	Yes	Yes
NASUWT Cymru	Yes	Yes

NUT Cymru	Yes	Yes
GMB	No comment	No comment
DfES School Workforce Unit	No comment	No comment
UCAC	Yes	Yes
UNISON	No comment	No comment
Newport LEA	Yes	Yes
GTCNI	Yes	Yes - need to ensure that, at the appropriate time, reciprocal arrangements are in place
GTCW	Yes - important that all appeals are administered and heard promptly in line with the timescales set out under The Education (Induction Arrangements for School Teachers) (Wales) Regulations 2003	Yes
Governors Wales	No comment	No comment

#### **(5) THE SCHOOL TEACHERS (CONSEQUENTIAL AMENDMENTS) (WALES) REGULATIONS 2004**

<b>Respondent</b>	<b>Proposal</b>
<b>11. Are you content that the consequential changes are appropriate?</b>	
SHA Cymru	Yes
M D Pickard	Yes
D Farmer	No comment
WSSA	Yes
NAHT	No comment
ATL	No comment
GTCE	No comment
WPSA	No - they are not all appropriate. Will not ensure standards are maintained as a result of these consequential changes
AN Other	Yes
Caerphilly LEA	Yes
Wrexham LEA	Yes
Free Church Council of Wales	NO comment

GTCS	Yes
Dept of Education - Univ Wales, Swansea	Yes
Cardiff School of Education	Yes
Wales TUC	Yes
NASUWT Cymru	Yes
NUT Cymru	No
GMB	No comment
DfES School Workforce Unit	No comment
UCAC	No comment
UNISON	No comment
Newport LEA	Yes
GTCNI	No comment
GTCW	Yes
Governors Wales	No comment