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Consultation Document

Requirements for the provision of initial teacher training courses in Wales – literacy and numeracy issues

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Action required: Responses by 3 August 2012

Requirements for the provision of initial teacher training courses in Wales – literacy and numeracy issues

- Overview** The Welsh Government is consulting on proposals to introduce a replacement for the Criteria for Initial Teacher Training Accreditation by the Higher Education Funding Council for Wales 2006, as amended. This would introduce revised requirements for the provision of initial teacher training courses in Wales. They would include statutory requirements for the assessment of trainees' personal literacy and numeracy skills and ensure that the teaching of literacy and numeracy forms an integral part of initial teacher training courses. The proposals include a number of supporting changes and updating amendments.
- Similar requirements are also proposed for the Employment-based Teacher Training Scheme 2012 when implemented. The introduction of this scheme was consulted on previously between 11 November 2011 and 31 January 2012; the Minister for Education and Skills announced on 19 March 2012 his intention to proceed with a new employment-based teacher training programme which would require the implementation of the 2012 Scheme.
- How to respond** Response forms should be e-mailed/posted to the address below, to arrive by **3 August 2012** at the latest.
- Further information and related documents** Large print, Braille and alternate language versions of this document are available on request.
- The consultation documents can be accessed from the Welsh Government's website at www.wales.gov.uk/consultations
- Contact details** For further information:
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Data protection

How the views and information you give us will be used

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tell us this in writing when you send your response. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

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1. What are the main issues?

1.1 The Welsh Government is consulting on proposals to introduce a replacement for the statutory accreditation criteria which all accredited institutions providing courses of initial teacher training (“ITT”) which lead to Qualified Teacher Status (QTS) must satisfy.

1.2 These are currently set out in the Criteria for Initial Teacher Training Accreditation by the Higher Education Funding Council for Wales 2006 (2006 No. 50), as amended by the Criteria for Initial Teacher Training Accreditation by the Higher Education Funding Council for Wales (Amendment) 2006 (2006 No. 75) (“the 2006 accreditation criteria”).

1.3 The 2006 accreditation criteria for ITT providers include statutory Requirements for the Provision of ITT Courses (“the Requirements”). These are set out in Annex A to the 2006 accreditation criteria. We are proposing to introduce a replacement for the 2006 accreditation criteria which would make the following changes from the Requirements to cover literacy and numeracy issues:

- (a) in the entry requirements section, changing the minimum entry standard from an equivalent to a GCSE grade C in English, mathematics, as well as in a science subject for primary entrants, to one of an equivalent to a GCSE grade B;
- (b) introducing a new provision in the entry requirements section which would make it mandatory for all ITT providers to ensure that all entrants are assessed as having functional personal skills in literacy and numeracy applicable in a professional teaching context, at a standard at least equal to the minimum entry level;
- (c) introducing a new provision in the training and assessment requirements section making it mandatory for all ITT providers to ensure that trainee teachers’ personal skills in literacy and numeracy are regularly and accurately assessed throughout their training; and specifying that at the point trainees are assessed as having met all the QTS Standards, that providers must be able to satisfy themselves that the standards at (b) above are still met;
- (d) introducing a new provision in the training and assessment requirements section making it mandatory for all ITT providers to ensure that students are trained in the teaching of literacy and numeracy appropriate to the phase and subject being studied, and that this forms an integral part of training courses.

1.4 We are also proposing some supporting changes aimed at harmonising some aspects of ITT to help ensure that the changes covering literacy and numeracy issues can work on a common basis. These would require all ITT providers to ensure that:

- (a) training programmes are designed to provide all trainees with at least 60 days of training activity per year – this would be a minimum period of

university-led and school-based dedicated training activity, separate from the teaching timetable;

- (b) the amount of time trainee teachers on postgraduate primary ITT programmes spend being trained in schools is increased from 18 weeks to at least 24 weeks.

1.5 As part of the approach to harmonising aspects of ITT to help ensure that the changes covering literacy and numeracy issues can work on a common basis, we are also proposing to make some changes to the Employment-based Teacher Training Scheme 2012 (“the 2012 Scheme”) when it is implemented. These would amend the requirements for the provision of ITT for employment-based teacher training programmes operated under the 2012 Scheme and set out in its annex, as follows:

- (a) in the entry requirements section EBR1, changing the minimum entry standard from an equivalent to a GCSE grade C in both English and in mathematics, to one of an equivalent to a GCSE grade B (and from an equivalent to a GCSE grade C in a science subject for primary entrants to one of an equivalent to a GCSE grade B);
- (b) introducing a new provision in the entry requirements section EBR1 which would make it mandatory for all ITT providers to ensure that all entrants to employment-based teacher training programmes are assessed as having functional personal skills in literacy and numeracy applicable in a professional teaching context, at a standard at least equal to the minimum entry level;
- (c) introducing a new provision in the training and assessment requirements section EBR2 making it mandatory for all ITT providers to ensure that trainees’ personal skills in literacy and numeracy are regularly and accurately assessed throughout their training; and specifying that at the point trainees are assessed as having met all the QTS Standards, that providers must be able to satisfy themselves that the standards at (b) above are still met;
- (d) introducing a new provision in the training and assessment requirements section EBR2 making it mandatory for all ITT providers to ensure that all those on employment-based teacher training programmes receive training in the teaching of literacy and numeracy appropriate to the phase and subject being studied, and that this forms an integral part of programmes.

1.6 The 2012 Scheme was consulted on between 11 November 2011 and 31 January 2012 and the Minister for Education and Skills announced on 19 March 2012 his intention to proceed with a new employment-based teacher training programme which would require the implementation of the 2012 Scheme.

1.7 We are also proposing to make some general miscellaneous changes and updating compared with the 2006 accreditation criteria. This would include no longer continuing to specify that ITT providers ensure that entrants met requirements for

health and physical capacity to teach. On the same basis, the similar requirement in the annex to the 2012 Scheme would be removed.

1.8 Apart from the changes from the Requirements listed in paragraphs 1.3, 1.4 and 1.7, no significant alterations are proposed to the criteria for the accreditation of ITT providers.

2. Where are we now?

2.1 All providers who deliver ITT courses leading to QTS must be accredited by the Higher Education Funding Council for Wales (HEFCW). In order to be accredited by HEFCW, an institution providing ITT must meet criteria laid down by the Welsh Government.

2.2 The present criteria are set out in the 2006 accreditation criteria. These include the Requirements, which set out what all ITT providers must do in running ITT courses in relation to entry requirements, training and assessment, the management of the ITT partnership with schools, and quality assurance. The 2006 accreditation criteria is a statutory document made under the provisions of regulation 7 of the Education (School Teachers' Qualifications) (Wales) Regulations 2004.

2.3 Accreditation is awarded to the institution and covers all ITT courses run by that institution. Once conferred, accreditation is not time-limited, but may be withdrawn by HEFCW where there is evidence of non-compliance with the specified criteria. In this respect, HEFCW must have due regard to evidence from Estyn if ITT provision is judged by the Inspectorate not to satisfy accreditation requirements.

2.4 A copy of the two documents comprising the 2006 accreditation criteria may be seen at:

- www.wales.gov.uk/legislation/subordinate/nonsi/educationwales/2006/CriteriaforITT2006e?lang=en
- www.wales.gov.uk/legislation/subordinate/nonsi/educationwales/2006/CriteriaforITTAccred2006e?lang=en

2.5 The provision of employment-based ITT (on programmes such as the Graduate Teacher Programme) is not subject to the 2006 accreditation criteria. This means that the Requirements also do not apply to employment-based ITT programmes. Employment-based ITT is currently governed by the Employment-based Teacher Training Scheme 2011 (2011 No. 32) ("the 2011 Scheme"), and this contains requirements for the provision of ITT for employment-based teacher training programmes in its annex. A copy of the 2011 Scheme may be seen at www.wales.gov.uk/legislation/subordinate/nonsi/educationwales/2011/5360417/?lang=en

2.6 Proposals for a replacement Employment-based Teacher Training Scheme – the 2012 Scheme – were consulted on between 11 November 2011 and 31 January 2012. Following the consultation, the Minister for Education and Skills announced on 19 March 2012 his intention to proceed with a new employment-based teacher training programme which would require the implementation of the 2012 Scheme to replace the 2011 Scheme. A copy of the consultation material, including the draft version of the 2012 Scheme, may be seen at www.wales.gov.uk/consultations/education/teachertraining/?lang=en&status=closed

3. Why are we proposing change?

Literacy and numeracy issues

3.1 In a speech on 2 February 2011, the Minister for Education and Skills set out a 20-point plan for improving school standards. This highlighted a key focus on literacy and numeracy. One of the action points was for the introduction of statutory requirements for assessments of ITT trainees' personal skills in literacy and numeracy, and for all qualifying teachers to be trained in literacy and numeracy.

(i) Assessment of ITT trainees' literacy and numeracy skills

3.2 There are existing statutory provisions in the Requirements relating to assessment of trainees' personal skills in literacy and numeracy at entry. All ITT providers must ensure that all entrants have achieved a standard equivalent to a grade C in the GCSE examination in both English and in mathematics. They must also satisfy themselves that all entrants can read effectively, and are able to communicate clearly and accurately in spoken and written English.

3.3 ITT providers already undertake assessment at entry of candidates' literacy skills, and in some instances their numeracy skills, and this information is utilised prior to an offer of a place being made. Providers also undertake both literacy and numeracy assessments of ITT trainees throughout the duration of their course.

3.4 In the majority of cases, specific exit assessments of ITT trainees are not undertaken. The approach of ITT providers is for continuous assessment of trainees throughout the duration of courses, as a better way of ensuring that appropriate standards are reached and maintained to the end of the course.

3.5 At present, many of these assessments vary from institution to institution. Across Wales the ITT providers are collaboratively developing a common approach to the assessment of ITT trainees' literacy and numeracy skills.

3.6 Although there are provisions in the Requirements relating to assessment of trainees' personal skills in literacy and numeracy at entry there is not a directly stated requirement for this work. We wish to build on the existing assessment work being undertaken, and support work by providers to move towards common assessment standards, by making changes to the Requirements. These would introduce a specific requirement for assessment at entry of trainees' personal skills in literacy and numeracy; a specific requirement for trainee teachers' literacy and numeracy skills to be regularly and accurately assessed throughout their training; and a specific requirement that at the point trainees are assessed as having met all the QTS Standards, providers must be able to satisfy themselves that the standards for skills in literacy and numeracy are still met.

3.7 For similar reasons, we are proposing a parallel change to the requirements for the provision of ITT for employment-based teacher training programmes in the annex to the 2012 Scheme.

(ii) Standards for literacy and numeracy skills

3.8 The requirements discussed at paragraph 3.6 need to have a reference to a particular set or level of academic or related standards which we would expect these requirements to be set against.

3.9 Currently, the statutory minimum qualification requirement for entry to ITT courses is the equivalent of a C grade GCSE in English and mathematics (and in science, for primary courses). Providers are, however, free to set individual standards above the minimum, and at present for the English qualification there is an almost universal requirement across ITT providers in Wales for the equivalent of a grade B at GCSE for course entry. The position on mathematics is more mixed, but there were several instances of B grades being needed.

3.10 Given the importance which is attached to the raising standards in literacy and numeracy, we are proposing to increase the minimum entry qualification requirement from a grade C GCSE equivalent in English and mathematics to a grade B GCSE equivalent. This would also apply to a science subject for primary courses for consistency. The requirements discussed at paragraph 3.6 would specify that trainees' personal skills in literacy and numeracy would need to be at an academic standard equivalent to the proposed grade B GCSE equivalent minimum entry qualification requirement, and that they would need to be functional skills which would be applicable in a professional teaching context. We would welcome views on how the reference to these functional skills could be practically described and applied in these requirements.

3.11 The Requirements do not currently include a statutory minimum requirement for entry to ITT courses for a qualification in Welsh and we are not proposing to add one to an amended version at this time. A consultation on the Requirements before they were introduced in 2006 included a proposal that they should incorporate some Welsh-specific entry requirements for Welsh-medium courses. Although respondents welcomed the principal of Welsh-specific entry requirements having standards which matched those for ITT courses generally, in practice many felt that there would be serious practical difficulties in adopting this approach. It was felt that referencing a Welsh GCSE standard would discriminate against those who had learned Welsh as a second language at school and who had pursued subsequent learning through the medium of Welsh. There were concerns about what would constitute a 'Welsh-medium course', with some courses being felt to have insufficient Welsh-medium content to justify an insistence on high-level language skills on entry.

3.12 There were also concerns that Welsh-specific entry requirements would create a barrier before entry to Welsh-medium ITT, compared with an approach of offering Welsh language support during training. There are various ways in which trainees on ITT courses who need support on Welsh language skills can be assisted, which can reflect the varying skill levels needed, for example for Welsh-medium teaching; being able to teach Welsh second language in primary schools; or for teaching the Foundation Phase Areas of Learning Language, Literacy and Communication Skills, and Welsh Language Development. The Welsh Government provides funding for the Welsh Medium Improvement Scheme (WMIS), which aims to offer additional training and support to help trainee teachers enrolled on qualifying

secondary postgraduate ITT courses to qualify to teach through the medium of Welsh. The WMIS is directed at trainees who wish to teach a secondary subject through the medium of Welsh but require additional support to raise their linguistic skills and confidence to do so.

3.13 ITT providers also provide support for trainees to learn and to teach Welsh as a second language in primary schools through the Cynllun Colegau Cymru (Welsh Colleges Scheme). Moderation of the competence levels achieved by trainees takes place across the ITT Centres to ensure consistency. The newly-established Coleg Cymraeg Cenedlaethol, working with the ITT Centres, will be preparing a development plan for Welsh-medium ITT which will be incorporated in the Coleg's overall academic plan. The Coleg is also establishing within its structures a panel to include staff from the ITT Centres to consider matters relevant to Welsh-medium ITT. The Coleg will be working with the ITT Centres and HEFCW to establish ways of measuring and recognising the Welsh-medium competence of teacher trainees and is also considering, in discussion with the ITT Centres, assuming responsibility for the administration of the Cynllun Coleg Cymru.

(iii) Training in the teaching of literacy and numeracy

3.14 The existing statutory provisions in the Requirements cover the provision of training relating to the teaching of literacy and numeracy through requirements that ITT course provision must enable trainees to demonstrate that they have met the QTS Standards.

3.15 The QTS Standards – currently set out in The Qualified Teacher Status Standards Wales 2009 (2009 No. 25) – include numerous requirements relating to the teaching of literacy and numeracy. In order to gain QTS, trainees must demonstrate that they have a secure knowledge and understanding of the subject(s) they are trained to teach; and that they can teach the required or expected skills, knowledge, and understanding relevant to the curriculum for learners in the age range for which they are trained.

3.16 For all phases, trainees must show that they know and understand the most recent national guidance on developing thinking, communication, ICT and number skills, for example that set out in the *Skills framework for 3 to 19-year-olds in Wales* (Welsh Assembly Government, 2008). In relation to teaching in specific phases:

- those qualifying to teach Foundation Phase children must show that they teach competently and independently the seven Areas of Learning that form the Foundation Phase curriculum (including Language, Literacy and Communication Skills, and Mathematical Development);
- those qualifying to teach learners in Key Stage 2 must show that they can teach the core subjects (including English and mathematics) competently and independently;
- those qualifying to teach Key Stage 3 or Key Stage 4 learners must show that they can teach their specialist subject(s) competently and independently, using the national curriculum programmes of study.

3.17 The Requirements also state that all ITT providers must ensure that trainee teachers' achievements against the QTS Standards are regularly and accurately assessed. All ITT providers must also satisfy themselves that all trainee teachers have been assessed against and have met all the QTS Standards before confirming to the appropriate body that trainees can be notified that they are qualified teachers.

3.18 Although there are obligations relating the provision of training relating to the teaching of literacy and numeracy through the mandatory requirement to train students to meet the QTS Standards, there is not a directly stated requirement for this work in the Requirements. We would like to make changes to the Requirements to introduce a specific requirement that students are trained in the teaching of literacy and numeracy. The establishment of a specific statutory Requirement would highlight the importance attached to this area of training and would act as a focus for ITT providers' work in this area. It would also introduce it as an area specifically to be addressed by Estyn in its inspection of ITT provision, and would provide a specific point of reference in HEFCW's consideration of the accreditation of ITT providers.

3.19 On the same basis, a parallel change is proposed to the requirements for the provision of ITT for employment-based teacher training programmes set out in the annex to the 2012 Scheme.

(iv) Changes supporting amendments relating to literacy and numeracy

3.20 We are also proposing some supporting changes aimed at harmonising some aspects of ITT to help ensure that the changes covering literacy and numeracy issues can work on a common basis.

3.21 We are proposing to introduce a new provision which would require all ITT providers to ensure that training programmes are designed to provide all trainees with at least 60 days of training activity per academic year (on a pro-rata basis for part-time or modular courses). This would be a minimum period of university-led and school-based dedicated training activity, separate from the teaching timetable. It would complement the existing stated minimum periods trainees are required to spend being trained in schools, and provide for a common approach for all trainees.

3.22 Currently the minimum amount of time trainee teachers on postgraduate primary ITT programmes must spend being trained in schools is 18 weeks. We are proposing to increase this to at least 24 weeks. This would help ensure that primary postgraduate courses provide the same level of school-based training as secondary postgraduate courses.

Other changes

3.23 We are also proposing some miscellaneous changes and updates generally compared with the 2006 accreditation criteria. These are mostly minor alterations in order to update and clarify the legislation.

3.24 One updating change relates to a provision in the Requirements that ITT providers must ensure that all entrants meet requirements for health and physical capacity to teach, currently set out in the Education (Health Standards) (Wales) Regulations 2004. These include specifying a range of teaching activities which a person may carry out only if he or she has the health or physical capacity to do so. This provision would apply to trainees on ITT courses undertaking practical teaching experience in schools.

3.25 Subsequent legislative developments since then include the Equality Act 2010, and Section 60 of that Act provides that, except in specified situations, employers should not ask health-related questions of applicants before job offers. These specified situations can include finding out whether a job applicant would be able to undertake a function that is intrinsic to the job, with reasonable adjustments in place as required.

3.26 Against a background where employers should no longer ask generic 'all-encompassing' health questions, it is not thought appropriate for the Requirements to include a provision that ITT providers must ensure that all entrants meet requirements for health and physical capacity to teach. We are therefore proposing to remove this requirement. A revised replacement is not proposed; ITT providers have to meet statutory obligations in relation to trainees on ITT courses under a range of equalities and disabilities legislation, and a provision in the Requirements covering these is not felt to be practicable.

3.27 Similar changes are proposed to the requirements for the provision of ITT for employment-based teacher training programmes set out in the annex to the 2012 Scheme.

4. What specific changes are we proposing?

4.1 We are proposing to revoke the 2006 accreditation criteria and replace it with a revised and updated statutory document. The principal changes would be to the Requirements, currently set out at Annex A to the 2006 accreditation criteria. Compared with the present version, the following changes would be made:

Entry requirements

- (a) Currently, requirement R1.2 says that all ITT providers must ensure that all entrants have achieved a standard equivalent to a grade C in the GCSE examination in English and in mathematics. We propose to introduce an amended requirement that all ITT providers must ensure that all entrants have achieved a standard equivalent to a grade B in the GCSE examination in English and in mathematics.
- (b) Similarly, the present requirement R1.3 (as amended) says that all ITT providers must ensure that all entrants who enter primary or Key Stage 2/3 training have achieved a standard equivalent to a grade C in the GCSE examination in a science subject. We propose to introduce an amended requirement that all ITT providers must ensure that all entrants who enter primary or Key Stages 2/3 training have achieved a standard equivalent to a grade B in the GCSE examination in a science subject.
- (c) A new provision would be introduced which would make it mandatory for all ITT providers to ensure that all entrants are assessed as having functional personal skills in literacy and numeracy applicable in a professional teaching context, at a standard at least equal to the minimum GCSE-equivalent qualification entry requirement.
- (d) The present requirement R1.4, which says that all ITT providers must ensure that all entrants have met the National Assembly for Wales' requirements for health and physical capacity to teach, would not be included in the requirements in the revised and updated statutory document.

Training and assessment requirements

- (e) A new provision would be introduced which would make it mandatory for all ITT providers to ensure that trainee teachers' personal skills in literacy and numeracy are regularly and accurately assessed throughout their training; and specifying that at the point trainees are assessed as having met all the QTS Standards, that providers must be able to satisfy themselves that the standards at (c) above are still met.
- (f) A new provision would be introduced which would make it mandatory for all ITT providers to ensure that students are trained in the teaching of literacy and numeracy appropriate to the phase and subject being studied, and that this forms an integral part of training courses.

- (g) A new provision would be introduced which would make it mandatory for all ITT providers to design training programmes so that they provide all trainees with at least 60 days of training activity per academic year (this would be on a pro rata basis for part-time or modular courses).
- (h) The present requirement R2.5 says that all ITT providers must ensure that trainee teachers on all primary postgraduate programmes spend at least 18 weeks being trained in schools. We propose to introduce an amended requirement that trainee teachers on all primary postgraduate programmes spend at least 24 weeks being trained in schools.

4.2 We are also proposing to make some similar changes to the 2012 Scheme. These would amend the requirements for the provision of ITT for employment-based teacher training programmes to be operated under the 2012 Scheme and set out in its annex, as follows:

Entry requirements

- (a) Requirement EBR1.2 would require that all employment-based ITT providers must ensure that all entrants have achieved a standard equivalent to a grade C in the GCSE examination in English and in mathematics. We propose to introduce an amended requirement that all employment-based ITT providers must ensure that all entrants have achieved a standard equivalent to a grade B in the GCSE examination in English and in mathematics.
- (b) Similarly, the requirement EBR1.3 would require that all employment-based ITT providers must ensure that all entrants for primary or Key Stage 2/3 training programmes have achieved a standard equivalent to a grade C in the GCSE examination in a science subject. We propose to introduce an amended requirement that all employment-based ITT providers must ensure that all entrants for primary or Key Stage 2/3 training programmes have achieved a standard equivalent to a grade B in the GCSE examination in a science subject.
- (c) A new provision would be introduced which would make it mandatory for all employment-based ITT providers to ensure that all entrants are assessed as having functional personal skills in literacy and numeracy applicable in a professional teaching context, at a standard at least equal to the minimum GCSE-equivalent qualification entry requirement.
- (d) Requirement EBR1.4, which would require that all employment-based ITT providers must ensure that all entrants have met the Welsh Ministers' requirements for health and physical capacity to teach, would not be included in the requirements in the revised statutory document.

Training and assessment requirements

- (e) A new provision would be introduced which would make it mandatory for all employment-based ITT providers to ensure that trainees' personal

skills in literacy and numeracy are regularly and accurately assessed throughout their training; and specifying that at the point trainees are assessed as having met all the QTS Standards, providers must be able to satisfy themselves that the standards at (c) above are still met.

- (f) A new provision would be introduced which would make it mandatory for all employment-based ITT providers to ensure that all those on employment-based teacher training programmes receive training in the teaching of literacy and numeracy appropriate to the phase and subject being studied, and that this forms an integral part of programmes.

4.3 In respect of entry to ITT programmes in the 2013/14 academic year, we are proposing that the revised criteria for the accreditation of ITT providers with the amended requirements for the provision of ITT courses would operate from September 2013.

4.4 The timing of the 2012 Scheme would be as previously consulted upon, with it applying to Graduate Teacher Programme or Registered Teacher Programme places where the training period commenced on or after 1 September 2013; and to Additional Training Graduate Programme places where the training period commenced on or after 1 June 2013.