Public Good and a Prosperous Wales -

Building a reformed PCET system

23rd October 2017

CLILC • WLGA

INTRODUCTION

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales. The three fire and rescue authorities and the three national park authorities are associate members.

2. It seeks to provide representation to local authorities within a dynamic and developing policy framework that satisfies the key priorities of its members and delivers a broad range of services that add value to Welsh Local Government and the communities it serves.

3. The WLGA is guided by a number of key principles which underpin the work of the Association and have helped to shape this response to the Welsh Government's *Public Good and Prosperous Wales* Consultation Document.

4. The WLGA believes that the delivery of public services should be set in a foundation of good governance with appropriate mechanisms for audit, scrutiny and accountability. It is also the WLGA's belief that local services should be provided within a democratic framework of local accountability where decisions about services should be taken as close point of delivery as possible and that the people and communities using those services should be as engaged as possible in their delivery.

5. The WLGA recognises that it is the role of the Welsh Government to set the strategic framework and policy direction for services at a national level and that it is the role of local government to deliver those services taking account of the local circumstances and pressures. It is also recognised that services must be provided within a proportionate but effective regulatory framework to ensure that public resources are used appropriately and that services are delivered effectively and efficiently.

6. Taken as a whole, these principles provide assurance to the public that the appropriate structures and processes are in place to ensure that resources are used as effectively and as efficiently as possible in the provision of public services and that the public can hold these bodies to account, to ensure that they are doing what should be doing.

7. The WLGA has consistently argued for an un-hypothecated revenue support grant (RSG) as the best way of funding local government and any new responsibilities or additional burdens placed on local government should be fully costed and appropriately funded.

8. The WLGA recognises that some policy initiatives or strategies need to have funding attached to them for specific periods of time to make sure that they become

embedded and are delivered as intended. For this reason, the WLGA, by exception, supports the use of specific grants on the understanding that funding will eventually return to the RSG.

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9. The WLGA is pleased to be able to respond to the Welsh Government's consultation on *Public Good and a Prosperous Wales - building a reformed PCET system* and supports many aspects of the proposed policy approach. The WLGA also welcomes the overall approach adopted by the Welsh Government to the consultation process, the early engagement with interested stakeholders and the on-going dialogue between WG officials and their partners. This process of continuous engagement is a very healthy, constructive and productive approach to policy making.

10. As a consequence of this approach, WLGA and WG officials are already in discussion on this policy area. This response will therefore highlight general principles and strategic concerns and priorities on the part of the WLGA rather than respond to the detailed questions attached to the consultation document.

11. Education remains a key priority for local government in Wales. All 22 authorities are committed to raising standards and improving outcomes for children and young people. They also recognise the important role played by post compulsory education and training in enabling individuals to fulfil their potential and to contribute meaningfully to prosperous and sustainable communities. Education and training are thus seen as part of a continuum that benefits individuals, their communities, wider society and Wales as a whole as together we seek to create a prosperous and sustainable future. Whether though academic or vocational routes we all have a part to play and a stake in the potential of a prosperous future.

12. These are challenging times for the public sector in Wales. The 22 councils in Wales have experienced 8 consecutive years of budget cuts and the continuing uncertainty of what local government reform means. There is the uncertainty also around the UK's departure from the European Union and the impact of the wider process of globalisation and technological change on Wales and its communities.

13. As a result, local government understand fully the pressures facing post-compulsory education and training in Wales. These include:

- the need to use resources as effectively and as efficiently as possible;

- the need to be sensitive to learner and provider needs but to understand how they relate to the needs of the economy and employers;

- the need to coordinate, cooperate and where appropriate to collaborate in post-16 provision.

- the need to streamline processes, reduce bureaucracy and reduce complexity yet at the same time provide assurance in terms of scrutiny, accountability and standards.

The Hazelkorn Review

14. It is within this context that the Welsh Government commissioned Professor Ellen Hazelkorn to review the oversight of post-16 provision in Wales. When the ensuing Hazelkorn Report was published it proposed a national vision for post compulsory education and training in Wales and proposed the creation of an arms-length body to regulate and provide oversight of the post compulsory education and training system.

15. This White Paper proposes ideas about how these recommendations might be taken forward and while the WLGA recognises the problems that Hazelkorn and the White Paper seek to address, there are also some concerns and specific areas where more detail or more clarity are needed.

16. The proposal of a vision for the PCET system is endorsed fully as is the view "that the Welsh Government should develop an overarching vision for the PCET system, with stronger links between education / training policy and providers and social and economic goals." The WLGA has always argued that strategy should be set nationally by the Welsh Government and interpreted locally according to prevailing circumstances. The development of a universal and integrated vision for PCET is therefore welcome and very much supported.

17. More clarity and discussion are needed around the proposal to create a Tertiary Education and Research Commission for Wales and perhaps greater consideration can be given to this element during the consultation process. Local government is always concerned about the creation of bureaucracy, process and complexity so would welcome further discussion about how such an approach would work in practice.

18. Previous attempts at creating an overarching body were unsuccessful and no one would want to repeat the ELWa experience. Education and Learning Wales - ELWa - was an Assembly Sponsored Public Body created in 2001 and responsible for post-16 learning in Wales. ELWa was established by the Learning and Skills Act 2000 and was formed by bringing together most of the responsibilities of the Further Education Funding Council for Wales (FEFCW), the four Training and Enterprise Councils (TECs) in Wales and the Council of Welsh TECs, together with the responsibilities previously held by local authorities for adult and continuing education. The organisation's remit

was to plan and fund post-16 learning in Wales, including further education, publicly funded work-based training, adult community learning and school sixth forms.

19. The ELWa brand was shared by the Higher Education Funding Council (HEFCW) at the outset and although the two organisation worked closely together by 2002, after a Ministerial review, the identities of the two organisations were separated. ELWa itself was taken back into the Welsh Government in 2006 and was seen widely as having failed in delivering its main objectives.

20. ELWa's main statutory responsibilities were to:
    - Secure the provision of facilities for post-16 education and training in Wales;
    - Encourage young people and adults to participate in learning; and
    - Encourage employers to participate in, and contribute to the costs of, post-16 education and training.

21. Its efforts to create National Planning Framework and Funding System (NPFS) proved to be problematic from the outset. The principles of providing continuity of funding to enable providers to plan from year to year and measuring the volume of learning so that "funding followed the learner" were widely supported but proved elusive at an operational level. School 6th forms witnessed massive and unmanageable fluctuations in funding at the time so it is important that the lessons of the ELWa experience are recognised, understood and inform any future developments.

22. The current complexity of PCET governance and oversight system is a consequence of the demise of ELWa. The White Paper provides a very helpful over view of current arrangements and rightly draws attention to the potential for duplication, overlap and confusion in the system. No one could endorse the current level of complexity.

23. The WLGA would therefore welcome broadly the range of functions proposed for the new Commission but would want to see the Commission located within a democratic framework with local accountability. Care should be taken also to ensure that the Commission's proposed functions were not duplicating those provided by existing bodies. The White Paper's focus on avoiding duplication and overlap in the PCET sector must extend to the Commission itself and it should not consider taking on any functions if there is an existing viable and sustainable alternative.

24. The responsibility for the strategic planning of the delivery of educational and skills provision across the sector would be welcome within this context with the exception of schools 6th forms.

25. School 6th forms are an important part of the PCET system as the White Paper rightly highlights, with around half of 16 year olds continuing their full time education in schools. Sixth forms are however an integral part of schools and despite the need for

coherence across the PCET system, the WLGA believes that schools 6th forms would be better organised as an integrated part of the existing pre-16 school provision. This should include inspection through Estyn and a return to funding schools 6th forms through the local authority Revenue Support Grant (RSG) would overcome the financial turbulence of recent years the risk of cross subsidy between pre and post 16 funding.

26. The challenge would then be to ensure that school 6th forms, and the wider school system, were part of the new coherent approach: sensitive to and an aligned part of the wider PCET system. The current skills partnerships might have a role to play in this respect and indeed the White Paper is silent on the future role of the four skills partnerships.

27. The WLGA also has some anxieties over the principle of combining the commissioning and regulatory functions in one body. The Association has long argued for a more integrated approach to audit and inspection in Wales which is proportionate to risk. The WLGA welcomes therefore the desire to streamline the process and would want assurance that any new structures were absolutely necessary. Further discussion is needed on these issues.

28. The WLGA supports the underpinning of this approach with the Wellbeing of Future Generations (Wales) Act 2015 and the Welsh Government's approach to the Welsh language.

29. The Association also supports the focus on outcomes rather than process and would welcome further discussion on Outcome Agreements. There is a danger however that institutions can focus on short-term outcomes and the impact of an intense focus on the Level 2 Inclusive measure at GCSE level is a warning of what can happen when there is too close a focus on a narrow range of outcomes. These dangers might be exacerbated if there was a close link between funding and outcomes and again there might be lessons to consider from the NPFS experience.

Conclusions

30. In conclusion, the WLGA welcomes the approach set out in the Welsh Government's Consultation Document, *Public Good and a Prosperous Wales – Building a Reformed PCET System*. The Association welcomes broadly the ideas set out in the document and the proposed approach set out for engaging with partners as the policy develops. The Associations recognises the need to develop greater coherence to the PCET system, the need for a strategic approach to planning and funding provision and the need to reduce complexity, overlap and duplication. The WLGA always promotes the provision of public services within a framework of democratic and local accountability and the principle that services users should be as engaged as possible in the way services are provided and delivered. The Association adheres to this

approach in this instance and for this and other reason, believes that school 6th forms should stay outside of the proposed Commission's remit but an integral part of the wider strategic approach.

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Budd y Cyhoedd a Chymru Ffyniannus -

Datblygu system addysg a hyfforddiant ôl-orfodol (PCET) ddiwygiedig

23 Hydref 2017

CLILC • WLGA

RHAGARWEINIAD

1. Mae Cymdeithas Llywodraeth Leol Cymru (CLlLC) yn cynrychioli'r 22 awdurdod lleol yng Nghymru. Mae'r tri awdurdod tân ac achub a'r tri pharc cenedlaethol yn aelodau cysylltiol.

2. Mae'n ceisio cynrychioli awdurdodau lleol o fewn fframwaith polisi deinamig a datblygol sy'n bodloni prif flaenoriaethau ei haelodau ac mae'n darparu ystod eang o wasanaethau sy'n ychwanegu gwerth at Lywodraeth Leol Cymru a'r cymunedau mae'n eu gwasanaethu.

3. Mae CLlLC yn cael ei llywio gan nifer o egwyddorion allweddol sy'n sail i waith y Gymdeithas ac sydd wedi helpu i lunio'r ymateb hwn i Ddogfen Ymgynghori *Budd y Cyhoedd a Chymru Ffyniannus* Llywodraeth Cymru.

4. Mae CLlLC o'r farn y dylai gwasanaethau cyhoeddus gael eu darparu ar sylfaen gadarn o lywodraethu da gyda mecanweithiau priodol ar gyfer archwilio, craffu ac atebolrwydd. Mae CLlLC o'r farn hefyd y dylai gwasanaethau lleol gael eu darparu o fewn fframwaith democrataidd o atebolrwydd lleol lle dylai penderfyniadau am wasanaethau gael eu gwneud mor agos â phosibl i'r man darparu ac y dylai'r bobl a'r cymunedau sy'n defnyddio'r gwasanaethau hynny gael cymaint o lais â phosibl ynghylch eu darpariaeth.

5. Mae CLlLC yn cydnabod mai rôl Llywodraeth Cymru yw gosod fframwaith strategol a chyfeiriad polisi gwasanaethau ar lefel genedlaethol ac mai rôl llywodraeth leol yw darparu'r gwasanaethau hynny gan ystyried amgylchiadau a phwysau yn lleol. Cydnabyddir hefyd fod rhaid i wasanaethau gael eu darparu o fewn fframwaith rheoleiddiol cymesur ond effeithiol i sicrhau bod adnoddau cyhoeddus yn cael eu defnyddio'n briodol a bod gwasanaethau'n cael eu darparu'n effeithiol ac yn effeithlon.

6. Gyda'i gilydd, mae'r egwyddorion hyn yn rhoi sicrwydd i'r cyhoedd bod y strwythurau a'r prosesau priodol ar waith i sicrhau bod adnoddau'n cael eu defnyddio mor effeithiol ac effeithlon â phosibl wrth ddarparu gwasanaethau cyhoeddus a bod y cyhoedd yn gallu dal y cyrff hyn i gyfrif, i sicrhau eu bod nhw'n gwneud beth y dylent fod yn ei wneud.

7. Mae CLlLC wedi dadlau'n gyson am grant cymorth refeniw heb ei neilltuo fel y ffordd orau o ariannu llywodraeth leol ac y dylai unrhyw gyfrifoldebau newydd neu feichiau ychwanegol a roddir ar lywodraeth leol gael eu costio'n llawn a'u hariannu'n briodol.

8. Mae CLlLC yn cydnabod bod rhai mentrau polisi neu strategaethau angen cyllid ynghlwm wrthynt am gyfnodau penodol er mwyn sicrhau eu bod yn ennill eu plwyf

ac yn cael eu darparu yn ôl y bwriad. Am y rheswm hwn, mae CLlLC, drwy eithriad, yn cefnogi'r defnydd o grantiau penodol ar yr amod y bydd cyllid yn dychwelyd i'r grant cymorth refeniw yn y pen draw.

Budd y Cyhoedd a Chymru Ffyniannus – datblygu system addysg a hyfforddiant ôl-orfodol ddiwygiedig

9. Mae CLlLC yn falch o allu ymateb i ymgynghoriad Llywodraeth Cymru ar *Budd y Cyhoedd a Chymru Ffyniannus – datblygu system addysg a hyfforddiant ôl-orfodol ddiwygiedig* ac mae'n cefnogi sawl agwedd ar y dull polisi arfaethedig. Mae CLlLC yn croesawu hefyd sut mae Llywodraeth Cymru wedi ymdrin â'r broses ymgynghori, yr ymgysylltu cynnar â rhanddeiliaid â buddiant a'r deialog parhaus rhwng swyddogion Llywodraeth Cymru a'u partneriaid. Mae'r broses hon o ymgysylltu parhaus yn ddull cynhyrchiol, adeiladol ac iach iawn o lunio polisi.

10. O ganlyniad i'r dull hwn, mae CLlLC a swyddogion Llywodraeth Cymru eisoes mewn trafodaethau ar y maes polisi hwn. Felly bydd yr ymateb hwn yn tynnu sylw at egwyddorion cyffredinol a phryderon a blaenoriaethau strategol ar ran CLlLC yn hytrach nag ymateb i'r cwestiynau penodol oedd yn cyd-fynd â'r ddogfen ymgynghori.

11. Mae addysg yn flaenoriaeth allweddol i lywodraeth leol yng Nghymru o hyd. Mae pob un o'r 22 awdurdod wedi ymrwymo i godi safonau a gwella canlyniadau i blant a phobl ifanc. Maent yn cydnabod hefyd y rôl bwysig y mae addysg a hyfforddiant ôl-orfodol (PCET) yn ei chwarae wrth alluogi unigolion i gyflawni eu potensial a chyfrannu mewn modd ystyrlon at gymunedau ffyniannus a chynaliadwy. Felly mae addysg a hyfforddiant yn cael eu gweld fel rhan o gontinwwm sydd o fudd i unigolion, eu cymunedau, cymdeithas ehangach a Chymru yn ei chyfanrwydd wrth i ni fynd ati gyda'n gilydd i geisio creu dyfodol ffyniannus a chynaliadwy. P'un ai drwy lwybrau academaidd neu alwedigaethol, mae gan bob un ohonom gyfraniad i'w wneud a budd ym mhotensial dyfodol ffyniannus.

12. Mae'r sector cyhoeddus yng Nghymru yn wynebu cyfnod anodd. Mae'r 22 cyngor yng Nghymru wedi gweld eu cyllidebau'n cael eu tocio am 8 mlynedd yn olynol ac ansicrwydd parhaus ynghylch beth mae diwygio llywodraeth leol yn ei olygu. Mae ansicrwydd hefyd ynghylch y DU yn gadael yr Undeb Ewropeaidd ac effaith y broses ehangach o globaleiddio a newid technolegol ar Gymru a'i chymunedau.

13. O ganlyniad, mae llywodraeth leol yn deall yn llawn y pwysau sy'n wynebu PCET yng Nghymru. Mae'n cynnwys:

- yr angen i ddefnyddio adnoddau mor effeithlon ac mor effeithlon â phosibl;

- yr angen i fod yn sensitif i anghenion dysgwyr a darparwyr ond deall eu perthynas ag anghenion yr economi a chyflogwyr;

- yr angen i gydgysylltu, gydweithredu a, lle bo'n briodol, cydweithio ym maes darpariaeth ôl-16;

- yr angen i symleiddio prosesau, lleihau biwrocratiaeth a lleihau cymhlethdod ond eto ar yr un pryd rhoi sicrwydd ynghylch craffu, atebolrwydd a safonau.

Adolygiad Hazelkorn

14. Hwn oedd y cyd-destun i Lywodraeth Cymru gomisiynu'r Athro Ellen Hazelkorn i adolygu'r oruchwyliaeth o ddarpariaeth ôl-16 yng Nghymru. Pan gyhoeddwyd Adroddiad Hazelkorn wedyn, roedd yn cynnig gweledigaeth genedlaethol ar gyfer PCET yng Nghymru ac yn cynnig creu corff hyd braich i reoleiddio ac arolygu'r system PCET.

15. Mae'r Papur Gwyn hwn yn cynnig syniadau ynghylch sut gellid rhoi'r argymhellion hyn ar waith ac er bod CLlLC yn cydnabod y problemau y mae Hazelkorn a'r Papur Gwyn yn ceisio mynd i'r afael â nhw, mae angen mwy o fanylder neu fwy o eglurder ynghylch rhai pryderon a meysydd penodol.

16. Mae'r cynnig o weledigaeth ar gyfer y system addysg a hyfforddiant ôl-orfodol yn cael ei chymeradwyo'n llawn, felly hefyd "y farn dylai Llywodraeth Cymru ddatblygu gweledigaeth gyffredin ar gyfer y system PCET, gyda chysylltiadau cryfach rhwng polisi a darparwyr addysg / hyfforddiant â nodau cymdeithasol ac economaidd." Mae CLlLC wedi dadlau ar hyd yr amser y dylai strategaeth gael ei phennu'n genedlaethol gan Lywodraeth Cymru a'i dehongli'n lleol yn ôl yr amgylchiadau. Felly mae datblygu gweledigaeth gyffredin ac integredig ar gyfer PCET i'w groesawu a'i gefnogi'n fawr.

17. Mae angen mwy o eglurder a thrafod ynglŷn â'r cynnig i greu Comisiwn Addysg Drydyddol ac Ymchwil Cymru a hwyrach y gellir ystyried rhagor ar yr elfen hon yn ystod y broses ymgynghori. Mae llywodraeth leol bob amser yn pryderu ynghylch creu biwrocratiaeth, proses a chymhlethdod felly byddem yn croesawu rhagor o drafod ar sut byddai dull gweithredu o'r fath yn gweithio'n ymarferol.

18. Aflwyddiannus fu ymdrechion blaenorol i greu corff trosfwaol ac ni fyddai unrhyw un yn awyddus i ailadrodd yr hyn ddigwyddodd gydag ELWa. Corff Cyhoeddus a Noddir gan y Cynulliad oedd ELWa – Dysgu ac Addysgu Cymru. Cafodd ei sefydlu yn 2011 i fod yn gyfrifol am ddysgu ôl-16 yng Nghymru. Fe'i sefydlwyd o dan Ddeddf Dysgu a Sgiliau 2000 ac fe'i ffurfiwyd drwy ddwyn ynghyd y rhan fwyaf o gyfrifoldebau Cyngor Cyllido Addysg Bellach Cymru (CCABC), y pedwar Cyngor Hyfforddiant a Menter (CHM) yng Nghymru a Chyngor CHM Cymru, ynghyd â'r cyfrifoldebau a arferai fod gan awdurdodau lleol ym maes addysg oedolion ac addysg barhaus. Cylch

gwaith y sefydliad oedd cynllunio ac ariannu dysgu ôl-16 yng Nghymru, yn cynnwys addysg bellach, hyfforddiant seiliedig ar waith a ariennir yn gyhoeddus, dysgu oedolion yn y gymuned a chweched dosbarth ysgolion.

19. I ddechrau roedd Cyngor Cyllido Addysg Uwch Cymru (CCAUC) yn rhannu brand ELWa ac er bod y ddau sefydliad yn cydweithio'n agos erbyn 2002, yn dilyn adolygiad Gweinidogol, cafodd y ddau sefydliad eu hunaniaeth eu hunain. Aeth ELWa yn ôl i fod yn rhan o Lywodraeth Cymru yn 2006 a'r farn gyffredinol oedd ei fod wedi methu â chyflawni ei brif amcanion.

20. Prif gyfrifoldebau statudol ELWa oedd:
    - Sicrhau darpariaeth cyfleusterau ar gyfer addysg a hyfforddiant ôl-16 yng Nghymru;
    - Annog pobl ifanc ac oedolion i gymryd rhan mewn dysgu; ac
    - Annog cyflogwyr i gymryd rhan mewn addysg a hyfforddiant ôl-16 a chyfrannu at gostau'r ddarpariaeth.

21. Wynebodd ei ymdrechion i greu Fframwaith Cynllunio a System Ariannu Cenedlaethol drafferthion o'r cychwyn cyntaf. Roedd cefnogaeth eang i'r egwyddorion o ddarparu cyllid parhaus i alluogi cynllunwyr i gynllunio o flwyddyn i flwyddyn a mesur hyd a lled y dysgu fel bod "cyllid yn dilyn y dysgwr" ond roedd hyn yn anodd ar lefel weithredol. Gwelodd dosbarthiadau chwech ysgolion amrywiadau enfawr ac anhylaw mewn cyllid ar y pryd felly mae'n bwysig bod y gwersi o brofiad ELWa yn cael eu cydnabod, eu deall ac yn llywio unrhyw ddatblygiadau yn y dyfodol.

22. Canlyniad tranc ELWa yw cymhlethdod cyfredol y system llywodraethu a goruchwylio PCET. Mae'r Papur Gwyn yn rhoi trosolwg defnyddiol iawn ar y trefniadau presennol ac yn tynnu sylw priodol at y potensial ar gyfer dyblygu, gorgyffwrdd a dryswch yn y system. Ni allai unrhyw un gymeradwyo'r lefel o gymhlethdod sy'n bodoli ar hyn o bryd.

23. Byddai CLlLC felly yn croesawu'n fras yr ystod o swyddogaethau a gynigir ar gyfer y Comisiwn newydd ond byddai am weld y Comisiwn yn cael ei leoli mewn fframwaith democrataidd gydag atebolrwydd lleol. Dylid bod yn ofalus hefyd i sicrhau nad oedd swyddogaethau arfaethedig y Comisiwn yn dyblygu swyddogaethau sy'n cael eu darparu gan gyrff sy'n bodoli'n barod. Rhaid i ffocws y Papur Gwyn ar osgoi dyblygu a gorgyffwrdd yn y sector PCET ymestyn i'r Comisiwn ei hun ac ni ddylai ystyried ysgwyddo unrhyw swyddogaethau os oes sefydliad hyfyw a chynaliadwy sy'n bodoli'n barod a allai eu cyflawni.

24. Byddai'r cyfrifoldeb am gynllunio'n strategol y gwaith o gyflwyno darpariaeth addysg a sgiliau ar draws y sector i'w groesawu yn y cyd-destun hwn ac eithrio dosbarthiadau chwech ysgolion.

25. Mae'r Papur Gwyn yn gywir i ddweud bod dosbarthiadau chwech ysgolion yn rhan bwysig o'r system PCET, gyda thua hanner y bobl ifanc 16 oed yn parhau â'u haddysg amser llawn mewn ysgolion. Wedi dweud hynny, mae dosbarthiadau chwech yn rhan annatod o ysgolion ac er gwaetha'r angen am gydlyniant ar draws y system PCET. Mae CLlLC o'r farn y byddai dosbarthiadau chwech ysgolion yn cael eu trefnu'n well fel rhan integredig o'r ddarpariaeth ysgol cyn-16 gyfredol. Dylai hyn gynnwys cael eu harolygu drwy Estyn a byddai dychwelyd i'r drefn o ariannu dosbarthiadau chwech ysgolion drwy Grant Cymorth Refeniw yr awdurdod lleol yn osgoi trybini ariannol y blynyddoedd diwethaf a'r risg o groes-gymhorthdal rhwng cyllid cyn-16 ac ôl-16.

26. Yr her wedyn fyddai sicrhau bod dosbarthiadau chwech ysgolion, a'r system ysgol ehangach, yn rhan o ddull cydlynol newydd: yn sensitif i'r system PCET ehangach ac wedi ei halinio â hi. Gallai fod yna rôl i'r partneriaethau sgiliau cyfredol yn hyn o beth ac, yn wir, nid oes unrhyw sôn yn y Papur Gwyn am rôl y pedair partneriaeth sgiliau yn y dyfodol.

27. Mae CLlLC yn pryderu rhywfaint hefyd am yr egwyddor o gyfuno'r swyddogaethau comisiynu a rheoleiddio mewn un corff. Mae'r Gymdeithas wedi hir ddadlau am ddull mwy integredig o archwilio ac arolygu yng Nghymru sy'n gymesur â risg. Mae CLlLC yn croesawu felly y dyhead i resymoli'r broses a byddai eisiau sicrwydd bod unrhyw strwythurau newydd yn gwbl angenrheidiol. Mae angen trafod y materion hyn ymhellach.

28. Mae CLlLC yn cefnogi'r seilio'r dull hwn ar Ddeddf Llesiant Cenedlaethau'r Dyfodol (Cymru) 2015 a dull gweithredu Llywodraeth Cymru mewn perthynas â'r Gymraeg.

29. Mae'r Gymdeithas yn cefnogi hefyd y ffocws ar ddeilliannau yn hytrach na phrosesau a byddai'n croesawu rhagor o drafod ar Gytundebau Deilliannau. Mae yna berygl, fodd bynnag, i sefydliadau ganolbwyntio ar ddeilliannau byrdymor ac mae effaith ffocws dwys ar y mesur Lefel 2 Cynhwysol ar lefel TGAU yn rhybudd o'r hyn all ddigwydd pan mae gormod o ffocws ar ystod gul o ddeilliannau. Gallai'r peryglon hyn fod yn waeth os oedd cysylltiad clir rhwng cyllid a deilliannau, ac unwaith eto efallai fod gwersi i'w hystyried yn sgil profiad y System Gynllunio ac Ariannu Genedlaethol.

Casgliadau

30. I gloi, mae CLlLC yn croesawu'r dull gweithredu a nodir yn Nogfen Ymgynghori Llywodraeth Cymru, *Budd y Cyhoedd a Chymru Ffyniannus - Datblygu System Addysg a Hyfforddiant Ôl-orfodol Ddiwygiedig.* Mae'r Gymdeithas yn croesawu'n fras y syniadau a gyflwynir yn y ddogfen a'r dull gweithredu arfaethedig a nodir ar gyfer ymgysylltu â phartneriaid wrth i'r polisi ddatblygu. Mae'r Gymdeithas yn cydnabod yr angen i ddatblygu mwy o gydlyniant yn y system PCET, yr angen am ddull strategol o gynllunio ac ariannu darpariaeth a'r angen i leihau cymhlethdod, gorgyffwrdd a

dyblygu. Mae CLlLC bob amser yn hyrwyddo darparu gwasanaethau cyhoeddus o fewn fframwaith o atebolrwydd democrataidd a lleol a'r egwyddor y dylai defnyddwyr gwasanaethau gael eu cynnwys cymaint â phosibl yn y ffordd y mae gwasanaethau'n cael eu darparu a'u cyflawni. Mae'r Gymdeithas yn cadw at y dull hwn yn yr achos hwn, ac am y rheswm hwn ymhlith eraill, mae o'r farn na ddylai dosbarthiadau chwech ysgolion gael eu cynnwys yng nghylch gwaith y Comisiwn arfaethedig ond y dylent fod yn rhan annatod o'r dull strategol ehangach.

I gael rhagor o wybodaeth cysylltwch â:

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