

Registration fees for the education workforce in wales (2017)

Annex: List of respondents

Published responses

Below are all the responses from the respondents who have agreed for their comments to be published. These responses are published in the language that they were received in.

- Lisa Matthews, Youth Service
- Kenneth Muir, CEO General Teaching Council for Scotland
- Robert William Cooke, Stanwell School
- James Odlum, St Cyres School
- Gaynor Roberts
- Paula Stanford, John Summers High School
- David Morgan, Cardiff and Vale College
- Gwenan Morgan Pugh, Ysgol Syr Thomas Jones
- Ian Roberts
- T Morris, Llantwit Major School
- David Mark Davies
- Dr Lowri Vaughan Brown, Conwy County Borough Council Education Service
- Owen Hathway, NUT Cymru
- Angharad Starr, Mudiad Meithrin
- Chris Keates, NASUWT
- Sarah Lewis, Estyn
- Gareth Newton, Education and Training Standards (ETS) Wales
- Hayden Llewellyn, Education Workforce Council
- Mary van den Heuvel, ATL Cymru
- Eirian Davies, Coleg Sir Gar
- Rebecca Williams, UCAC
- Rob Williams, NAHT Cymru
- Jackie Beckett, B-wbl Consortium
- Enid William, Gwasanaeth Ieuenctid Ynys Mon
- Nia Morris, Gwasanaeth Ieuenctid Gwynedd
- Lisa Edwards, UCU
- Amber Courtney, UNISON
- Jeff Protheroe, National Training Federation for Wales (NTfW)
- Claire Roberts, Colegau Cymru
- Tim Pratt, ASCL Cymru
- Ian Toone, Voice the Union

Published responses

Below are all the responses from the respondents who have agreed for their comments to be published. These responses are published in the language that they were received in.

Name: **Lisa Mathews**

Organisation: **Youth Service**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	X	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
-------	---	----------	--------------------------	----------------------------	--------------------------

Supporting comments

I agree that the fee should be set according to the level of qualification the individual has, therefore all individuals with degrees in the relevant topic should pay an equal amount and those with other relevant qualifications at a lower level including youth support should pay less.

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers' Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	X	No	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
-----	---	----	--------------------------	----------------------------	--------------------------

Supporting comments

--

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	X	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
-------	---	----------	--------------------------	----------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

As a qualified youth worker we are regularly not recognised as professionals although we deliver educational sessions in a range of settings. Having to subscribe to a regulated body ensures individuals continually engage in professional development and work towards set outcomes in order to renew their subscription

Name: **Kenneth Muir (Chief Executive and Registrar)**

Organisation: **General Teaching Council for Scotland**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
-------	-------------------------------------	----------	--------------------------	----------------------------	--------------------------

Supporting comments

GTC Scotland would support some degree of differentiation in fee levels to recognise the different salary levels generally paid to the different practitioners being registered. However, professional fee levels should be sufficiently significant in all categories to recognise the importance of registrants belonging to a valued profession.

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers’ Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
-----	--------------------------	----	-------------------------------------	----------------------------	--------------------------

Supporting comments

It is clear that the Welsh Government has gone to great lengths in successfully establishing the Education Workforce Council (EWC) as a coherent, overarching professional body for education professionals in Wales. Indeed, GTC Scotland would suggest that EWC, as now constituted, is leading the world in this regard.

Having established this world-leading Council, it seems incongruous that the level of EWC fees continues to be linked in any way to teachers’ pay and conditions and subject to Ministerial regulation. GTC Scotland was granted independence from Scottish Government in 2011 and, as part of this, GTC Scotland’s Council has the power to set its own fee levels, without any intervention from Government. This is increasingly the case in modern, dynamic Teaching Councils across the world. It would be unfortunate if the Welsh Government did not consider this as a progressive step for EWC at some point in the near future.

In general, models 1 and 2 would appear to provide the level of funding required by EWC to operate effectively. However, the points above about the continued need for the Welsh Government to “subsidise” EWC fees, directly or indirectly, seems inconsistent with concept of having a modern Workforce Council.

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
-------	-------------------------------------	----------	--------------------------	----------------------------	--------------------------

				disagree	
--	--	--	--	-----------------	--

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

GTC Scotland would support scale 3 or scale 4 for the reasons given in response to question 1. Highly professional practitioners recognise the importance of being part of a professional body such as EWC in terms of the status and public confidence this ensures. Scale points 3 and 4 give the best “balance” of fee levels that reflect salary levels and professional profile.

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Whatever the fee level model adopted, it will be important that it adequately takes account of EWC’s general “running costs”, with sufficient headroom for “developmental activities”. This will be particularly important given the significant changes and developments taking place in the Welsh education system; the implementation of which is likely to continue over several years.

It will also be important that fee levels set just now are at a level that adequately future proofs EWC’s budget for the coming years, without the need for further fee increases in a few years. This need for potential

future flexibility would be another reason for the Welsh Government giving powers to EWC to set their own fee levels.

Name: **Robert William Cooke**

Organisation: **Stanwell School, Penarth**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	X <input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers' Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	X	No	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
------------	----------	-----------	--------------------------	-----------------------------------	--------------------------

Supporting comments

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	X	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	----------	-----------------	--------------------------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Name: **James Odlum**

Organisation: **St Cyres School, Penarth**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	X	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	----------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

--

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers’ Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	X	Neither agree nor disagree	<input type="checkbox"/>
------------	--------------------------	-----------	----------	-----------------------------------	--------------------------

Supporting comments

It is unfair to ask for this fee in one payment. It makes it difficult to plan monthly expenditure, particularly for those on lower wages. By extension it is more difficult to plan when the fee is as high as £78 (even if some is refunded the next month).

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input type="checkbox"/>	Disagree	X	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	----------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4 √	£58	£30
5	£54	£35

6	£51	£40
7	£46	£46

Supporting comments

This seems a fairer percentage increase for school teachers compared with support/youth workers.

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Most importantly I do not believe we should have to pay this fee at all. The argument seems to simply be, that education should have a professional body because other professions do. It also seems simplistic to compare education with nursing, for example, which clearly has a different, and most likely larger, set of rules and standards.

If we must have this body, then it should be funded by the government in its entirety; teachers gain nothing from it, the government does.

If a fee is to be taken, it should not be taken in one payment for reasons stated above. Monthly, or even quarterly, would help the people who are forced to pay it.

Name: **Gaynor Roberts**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers' Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2

is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
------------	--------------------------	-----------	--------------------------	-----------------------------------	--------------------------

Supporting comments

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

--

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

--

Name: **Paula Stanford**

Organisation: **John Summers High School**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

--

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers' Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
------------	--------------------------	-----------	--------------------------	-----------------------------------	--------------------------

Supporting comments

--

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

I have looked at the models proposed and would be happiest with Model 1, the preferred model.

I think that it is important that those who earn the most subsidise those who earn the least.

Good work!

Name: **David Morgan**

Organisation: **Cardiff and Vale College**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
--------------	--------------------------	-----------------	--------------------------	-----------------------------------	-------------------------------------

Supporting comments

Fee level should reflect earnings and not categories. As it stands the fee structure discriminates against part time employees, the majority of who are female.

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers' Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
------------	--------------------------	-----------	--------------------------	-----------------------------------	-------------------------------------

Supporting comments

It is agreed with the proviso that Part time employees should pay a proportional fee

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
--------------	--------------------------	-----------------	--------------------------	-----------------------------------	-------------------------------------

This is agreed with the above comments still pertaining

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

N/A

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

In order to meet the criteria of proportionality as outlined in 6.1 of Welsh Government Consultation Document, fees should be proportional to earnings, and not full time equivalent earnings. Why not 0.01% of net earnings?

Enw: **Gwenan Morgan Pugh**

Sefydliad: **Ysgol Syr Thomas Jones**

Cwestiwn 1 – A ydych yn cytuno y dylai lefel y ffioedd gael ei phennu yn ôl categorïau ymarferwyr, hynny yw athrawon ysgol, athrawon (darlithwyr) AB, gweithwyr ieuentid, gweithwyr cymorth ieuentid, ymarferwyr dysgu seiliedig ar waith, gweithwyr cymorth dysgu addysg bellach/mewn ysgolion?

Cytuno	x	Anghytuno	<input type="checkbox"/>	Ddim yn cytuno nac yn anghytuno	<input type="checkbox"/>
---------------	----------	------------------	--------------------------	--	--------------------------

Sylwadau ategol

Byddai yn deg i edrych ar lefel gwahanol o ffioedd ar gyfer athrawon llanw, ac athrawon addysg gartref gan fod y contracts sydd yn perthnasu iddynt yn ymdebygu i “Zero hour contracts” gan fod cyfnodau sylweddol lle na chynigir unrhyw waith llanw i athrawon llanw, ac os bydd rhiant plenty addysg gartref yn ffonio hanner awr cyn y wers i ganslo ni fydd yr athro yn derbyn ceiniog o dal am yr oriau coll. Felly mae’n annheg i ddisgwyl iddynt gyfrannu yr un faint ac athrawon llawn amser.

Cwestiwn 2 – Ar hyn o bryd, mae'r Ysgrifennydd Gwladol dros Addysg yn ystyried diwygio'r *Ddogfen Cyflog ac Amodau Athrawon (STPCD)*, sef dileu'r cyfeiriad a wneir i'r lwfans presennol ar gyfer athrawon mewn ysgolion a gynhelir yng Nghymru, er mwyn i'r lwfans gael ei ailddosbarthu ar draws y gweithlu ehangach, gan leihau'r ffi ar gyfer pawb sy'n cofrestru o 2017 ymlaen, fel yr awgrymir o dan fodel 1.

Os **nad oes modd** diwygio'r *STPCD*, a ydych yn cytuno bod model 2 yn fodel teg ac addas, er mwyn codi'r arian y bydd ei angen ar Gyngor y Gweithlu Addysg?

Ydw	<input checked="" type="checkbox"/>	Nac ydw	<input type="checkbox"/>	Ddim yn cytuno nac yn anghytuno	<input type="checkbox"/>
-----	-------------------------------------	---------	--------------------------	---------------------------------	--------------------------

Sylwadau ategol

--

Cwestiwn 3a – Os na fydd yr arian ar gyfer y cymorthdal ar gael, bydd angen defnyddio model 3. A ydych yn cytuno â'r cynnig i seilio'r ffioedd ar raddfa 3 y tabl, fel yr amlinellir ym mharagraffau 9.1 – 9.6 yr ymgynghoriad?

Cytuno	<input checked="" type="checkbox"/>	Anghytuno	<input type="checkbox"/>	Ddim yn cytuno nac yn anghytuno	<input type="checkbox"/>
--------	-------------------------------------	-----------	--------------------------	---------------------------------	--------------------------

Cwestiwn 3b – Os byddwch yn anghytuno â defnyddio graddfa 3 model 3, nodwch pa raddfa a fyddai'n well i'w defnyddio drwy roi tic ym mlwch perthnasol y tabl isod:

Opswin ffioedd	Athrawon ysgol, addysg bellach, gweithwyr ieuenctid ac ymarferwyr dysgu seiliedig ar waith	Gweithwyr cymorth dysgu mewn ysgolion ac addysg bellach a gweithwyr cymorth ieuenctid
1	£68	£15
2	£65	£20

3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Sylwadau ategol

Os na fyddwch yn defnyddio model 3 yna dylech ystyried model 2 neu 1, gan fod cymorthyddion dysgu yma yn Ynys Mon eisioes wedi colli cannoedd o bunnoedd y flwyddyn o'i cyflogau drwy'r newid i gyflogaeth tymor yn unig . Os bydd ffioedd yn codi mae tebygolrwydd cryf bydd cymorthyddion cydwybodol yn cael eu gwthio allan o'r professiwn.

Cwestiwn 4 – Rydym wedi gofyn nifer o gwestiynau penodol. Os oes gennych chi faterion perthnasol nad ydym wedi rhoi sylw penodol iddynt, defnyddiwch y blwch isod i roi gwybod i ni amdanynt.

Efalle bod hi'n amserol i atgoffa aelodau o'r sector addysg beth yn union ydym yn gael am ein ffioedd a phwysigrwydd cofrestru, fel bod pawb yn teimlo iddynt gael gwerth eu harian.. Yn yr ardal yma, lle mae cyflogau yn isel ac arian yn dynn fydd cymharu addysg a ffioedd meddygon a deintyddion sydd ar gyflogau uchel yn debygol o godi gwrychyn y gneilledfa yr ydych yn dargedu ac eisiau ennill l'ch ochr.

Name: **Ian Roberts**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	-------------------------------------	-----------------------------------	--------------------------

Supporting comments

I do not believe that there should be a fee at all.

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers' Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested

under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
------------	--------------------------	-----------	-------------------------------------	-----------------------------------	--------------------------

Supporting comments

Again there is no need for the EWC.

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	-------------------------------------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

There should be an option to abolish the charges.

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

--

Name: **T Morris**

Organisation: **Llantwit Major School**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

The variation of salary levels across the education sector should be recognised in the EWC fee level.
--

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers' Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
------------	--------------------------	-----------	--------------------------	-----------------------------------	-------------------------------------

Supporting comments

The fee level for Youth workers does not recognise disparity between pay for these practitioners and teachers.

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	-------------------------------------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

Fee option 1 represents the fairest option for LSW as pay levels are low for these types of workers.

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Consideration needs to be given to how EWC fees are extracted from professionals. Although the fees are subsidised, the single point of extraction can put considerable pressure on families at a time of austerity. For a two teacher household the increase to £78 this year resulted in a shortfall of £156 in a single month. Although the fees are subsidised, the delay in subsidy payment fails to ameliorate this challenge. Proposed changes are a step towards addressing this issue however consideration needs to be given to the scheduling of payments. The requirement for fees to be paid direct from salary could easily be shifted to a monthly contribution as practiced by other professional bodies.

Consideration also needs to be given to the focus of the EWC. The focus on its disciplinary duties may contribute to the maintenance of standards of conduct however it is largely negative and contributes to the erosion of trust in educational workers in the media and public. It also contributes to a negative view amongst educational workers of the value of the EWC. In light of the increasing financial demands, the EWC should consider positive engagement with members.

Name: **Mr David Mark Davies**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input type="checkbox"/>	Disagree	x	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	----------	-----------------------------------	--------------------------

Supporting comments

Everyone in education have one common goal – to educate the public. Therefore I believe that everyone should pay the same registration fee.

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers' Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Neither agree nor disagree	x
------------	--------------------------	-----------	--------------------------	-----------------------------------	----------

Supporting comments

--

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input type="checkbox"/>	Disagree	x	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	----------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46
x		

Supporting comments

Everyone should be on an equal playing field.

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Name: **Dr Lowri Vaughan Brown**

Organisation: **Conwy County Borough Council Education Services**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	--------------------------	--------------------------

				disagree	
--	--	--	--	-----------------	--

Supporting comments

--

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers’ Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
------------	-------------------------------------	-----------	--------------------------	-----------------------------------	--------------------------

Supporting comments

--

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30

5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Name: **Owen Hathway**

Organisation: **NUT Cymru**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	X	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	----------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers' Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	X	Neither agree nor	<input type="checkbox"/>
------------	--------------------------	-----------	----------	--------------------------	--------------------------

				disagree	
--	--	--	--	-----------------	--

Supporting comments

Should the STPCD not be amended then it would mean that the subsidy currently in place for teachers should be retained by teachers. This model appears to work on the basis of the teaching subsidy being contributed by the teaching profession to raise money for a body responsible for a wider workforce. NUT Cymru were supportive of the notion of bringing other elements of the teaching workforce under the EWC umbrella. However, the notion of teachers being responsible for paying for that through their subsidy will not be well-received.

Currently the allowance is paid directly for the benefit of teachers and that is where it must remain. We would oppose any move to amend the STPCD by removing any reference to the existing allowance. That allowance should in fact be increased to cover the whole of the fee.

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input type="checkbox"/>	Disagree	X	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	----------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

As we previously outlined in our response to the EWC registration fee consultation in 2015. We believe there should be one single flat rate fee for registration.

Differentiating between the professionalism of the different groups should be achieved based on roles, responsibilities and qualifications rather than a registration fee. Further, it must always be recognised that monies received by the Welsh Government in respect of teacher registration fees must always be used for that purpose.

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

We note that the annex to the consultation provides a list of different professions and fees paid to the relevant regulatory body. At paragraph 3.2 it is stated that “professionals in those sectors are also required to fund their own registration as a requirement of employment” whilst at 6.3 it says “registrants need to be mindful that they will still continue to have one of the lowest registration fees of all the professional bodies” before making direct reference to the annex. The clear inference is that registrants to the EWC are in some ways better off than other professionals when it comes to any debate about the level of fee charged.

However, both the comments referred to above and the annex itself are flawed and/or deliberately misleading.

For example, it is a fact that the majority of solicitors employed in private practice have their registration or practising certificate fee paid for by their employer. We should also point out here that that fee has actually reduced from the £872 quoted in the consultation to the sum of £798 for 2016/17 and further is charged on a sliding scale depending upon where in the calendar year the payment is required. We are confident that any analysis of many of the other professions identified will reveal similar arrangements as regards payment by the employer and lower charges applicable during the year.

The NUT remains of the view that the EWC registration fee should be fully reimbursed by the employer.

Enw: **Angharad Starr**

Sefydliad: **Mudiad Meithrin**

Cwestiwn 1 – A ydych yn cytuno y dylai lefel y ffioedd gael ei phennu yn ôl categorïau ymarferwyr, hynny yw athrawon ysgol, athrawon (darlithwyr) AB, gweithwyr ieuentid, gweithwyr cymorth ieuentid, ymarferwyr dysgu seiliedig ar waith, gweithwyr cymorth dysgu addysg bellach/mewn ysgolion?

Cytuno	x	Anghytuno	<input type="checkbox"/>	Ddim yn cytuno nac yn anghytuno	<input type="checkbox"/>
---------------	----------	------------------	--------------------------	--	--------------------------

Sylwadau ategol

Cytunwn y dylai lefel y ffioedd gael ei phennu yn ôl categorïau ymarferwyr. Teimlwn mai graddfa ffioedd amrywiol yn seiliedig ar raddfa ffioedd amrywiol rhwng ymarferwyr â galwedigaeth sy'n gyffredinol yn ennill mwy (athrawon ysgol ac AB, ymarferwyr DSW a gweithwyr ieuenctid) ac ymarferwyr â galwedigaeth sy'n gyffredinol yn ennill llai (GCD mewn ysgolion ac AB a gweithwyr cymorth ieuenctid) yw'r ffordd tecaf o osod y ffioedd.

Cwestiwn 2 – Ar hyn o bryd, mae'r Ysgrifennydd Gwladol dros Addysg yn ystyried diwygio'r *Ddogfen Cyflog ac Amodau Athrawon (STPCD)*, sef dileu'r cyfeiriad a wneir i'r lwfans presennol ar gyfer athrawon mewn ysgolion a gynhelir yng Nghymru, er mwyn i'r lwfans gael ei ailddosbarthu ar draws y gweithlu ehangach, gan leihau'r ffi ar gyfer pawb sy'n cofrestru o 2017 ymlaen, fel yr awgrymir o dan fodel 1.

Os **nad oes modd** diwygio'r *STPCD*, a ydych yn cytuno bod model 2 yn fodel teg ac addas, er mwyn codi'r arian y bydd ei angen ar Gyngor y Gweithlu Addysg?

Ydw	x	Nac ydw	<input type="checkbox"/>	Ddim yn cytuno nac yn anghytuno	<input type="checkbox"/>
------------	----------	----------------	--------------------------	--	--------------------------

Sylwadau ategol

Dim sylwadau ategol.

Cwestiwn 3a – Os na fydd yr arian ar gyfer y cymorthdal ar gael, bydd angen defnyddio model 3. A ydych yn cytuno â'r cynnig i seilio'r ffioedd ar raddfa 3 y tabl, fel yr amlinellir ym mharagraffau 9.1 – 9.6 yr ymgynghoriad?

Cytuno	<input type="checkbox"/>	Anghytuno	x	Ddim yn cytuno nac yn anghytuno	<input type="checkbox"/>
---------------	--------------------------	------------------	----------	--	--------------------------

Cwestiwn 3b – Os byddwch yn anghytuno â defnyddio graddfa 3 model 3, nodwch pa raddfa a fyddai'n well i'w defnyddio drwy roi tic ym mlwch perthnasol y tabl isod:

Opwin ffioedd	Athrawon ysgol, addysg bellach, gweithwyr ieuenctid ac ymarferwyr dysgu seiliedig ar waith	Gweithwyr cymorth dysgu mewn ysgolion ac addysg bellach a gweithwyr cymorth ieuenctid
---------------	--	---

1	£68	£15
2 ✓	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Sylwadau ategol

Cytunwn gyda'r egwyddor o gael graddfa ffioedd amrywiol rhwng ymarferwyr â galwedigaeth sy'n gyffredinol ennill mwy a'r rhai sydd yn gyffredinol ennill llai. Er hynny, teimlwn y byddai opsiwn 2 fyddai'r opsiwn tecaf i'w ddilyn pe bai angen dilyn y drydedd fodel o ffioedd arfaethedig. Mae opsiwn 2 yn cynyddu'r ffioedd i bob grŵp, ond gyda'r % cynnydd i'w weld yn fwy teg ar draws y grwpiau. Fe fyddai opsiwn 2 yn golygu cynnydd o 45% i Athrawon ysgol ayb, a 33% i weithwyr cymorth dysgu ayb. Teimlwn y byddai opsiwn 3 sydd yn gweld cynnydd annheg i'r ymarferwyr sydd yn gyffredinol ennill lai (cynnydd o 67% yn y ffi cofrestru) o'i gymharu â'r cynnydd yn y ffi i'r ymarferwyr sy'n gyffredinol ennill mwy (cynnydd o 36%).

Cwestiwn 4 – Rydym wedi gofyn nifer o gwestiynau penodol. Os oes gennych chi faterion perthnasol nad ydym wedi rhoi sylw penodol iddynt, defnyddiwch y blwch isod i roi gwybod i ni amdanynt.

Name : **Chris Keates, General Secretary**

Organisation: **NASUWT Cymru**

1. The NASUWT welcomes the opportunity to comment on the Welsh Government's proposals to set the registration fees for the Education Workforce Council (EWC) from April 2017.
2. The NASUWT is the largest teachers' union in Wales representing teachers and school leaders.

GENERAL COMMENTS

3. The NASUWT remains deeply concerned by the decision of the Welsh Government to visit a double detriment on teachers working in Wales in terms of their remuneration, by:
 - (i) seeking the removal of the paragraph in the School Teachers' Pay and Conditions Document (STPCD) which requires the relevant body to pay teachers the sum of £33 towards the cost of registration with the EWC (the subsidy); and
 - (ii) increasing the fee to £78 if the paragraph is not removed, or to £45 if it is removed.
4. The NASUWT condemns the Welsh Government's misuse of a subsidy paid specifically to teachers and believes it is adding insult to injury to then criticise the Westminster Department for Education (DfE) for failing to meet the deadline for the removal of the £33 payment to teachers for the academic year 2015-16. No deadline was set and no recommendation was made for its removal from the 2015 Document for the fee paid in 2016.
5. The NASUWT is disappointed in the Welsh Government for its apparent desire to seize these funds from teachers and misrepresent the position. The recently published 26 Report of the School Teachers' Review Body (STRB) for England and Wales states:

'We recommend that there should, at present, be no amendment to the STPCD in respect of the Education Workforce Council fee allowance in 2016. We further recommend that, subject to the Welsh Government elected in May 2016 providing assurances to the Secretary of State that the fee level and subsidy for school teachers will be commensurate with that for FE teachers, the Secretary of State should, at the request of the Welsh Government, remove the relevant provision from the STPCD.'
6. The NASUWT is clear that the Welsh Government has been, and remains, at fault over the issues of the subsidy provided to teachers enshrined in the STPCD and was pleased to note that the STRB has recommended that it should not be removed at this time.
7. However, the Union also notes the further recommendation of the STRB in relation to subsidy, which allows for the removal of the relevant paragraph at the request of the Welsh Government, pending assurances that the fee level and subsidy for school teachers and FE teachers will be equitable.
8. The NASUWT recognises that Model 1 would allow the requisite assurance to be met, but this not only reduces the subsidy currently

paid to teachers by £32, but also consolidates the increases in the fee visited on teachers in 2015-16. The Union maintains that this approach would be outside the spirit of the STRB recommendation, given that it presents a detriment in terms of remuneration to teachers, and indirectly to FE teachers as well.

9. The fundamental error that the Welsh Government has made throughout is to view the subsidy as a subsidy for the registration of the wider education workforce, whereas it is a subsidy specifically for school teacher registrants, enshrined in statute as part of their overall remuneration package.
10. The NASUWT has consistently warned the Welsh Government that if the subsidy is removed, then it is highly likely that the Westminster Government will no longer provide the funding for it in the Welsh Budget settlement.
11. Consequently, the NASUWT maintains that Model 3 will be the model which will inevitably prevail in the context of this consultation, as Models 1 and 2 rely on the funding for the subsidy paid to teachers to continue to be included in the Welsh Budget settlement.
12. Under Model 1, which assumes the Welsh Government will continue to receive the funding for the subsidy, even though the provision for it would be removed from the STPCD, all registrants would pay the same fee (£45) but the school teachers and others in the same group of higher earner practitioners would receive a £1 subsidy. Practitioners in the lower earner group would receive a £31 subsidy. Whilst this may appear to be a philanthropic approach, it belies the fact that the £33 subsidy is currently part of the overall remuneration package for teachers and this would constitute a 97% reduction in the subsidy paid to teachers.
13. Under Model 2, although the £33 subsidy would remain for teachers, the registration fee would be £33 higher than the other registrant in the same fee bracket (£78 compared to £45). The subsidy for the other registrant, £4 for those in the higher fee bracket and £34 for those in the lower fee bracket, would be funded using the £33 increase in the fee for teachers.
14. Under Model 3, there is no subsidy provided by the Welsh Government, just a 35.5% increase in the fee for registrants paying the higher fee (£45 to £61) and a 66.6% increase for registrants paying the lower fee (£15 to £25).
15. The NASUWT regrets that the Welsh Government has failed to respect the purpose of the subsidy enshrined in the STPCD, preferring instead to seek to either involve the STRB in a slight of hand to secure money in the Welsh Budget settlement to which it

would have no entitlement, or to place an additional tax burden on all EWC registrants.

SPECIFIC COMMENTS

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

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	X	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
-------	---	----------	--------------------------	----------------------------	--------------------------

Supporting comments

The NASUWT agrees, in principle, that practitioners in the lower earner group should pay a lower fee than those in the higher earner group but stands by the view, shared by the Wales TUC, that as registration with the EWC is a condition of employment, the employer should cover the cost of registration.

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers' Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	X	Neither agree nor disagree	<input type="checkbox"/>
-----	--------------------------	----	---	----------------------------	--------------------------

Supporting comments

The NASUWT maintains that the construction of this question is wholly disingenuous as it seeks to suggest that the impetus for the removal of the allowance paid to teachers has come from the Secretary of State for Education rather than the Welsh Ministers.

The NASUWT maintains that it is to the shame of the Welsh Ministers that they have sought to visit a financial detriment on teachers in this way.

The NASUWT does not accept that Model 2 is a fair and appropriate model as it merely seeks to clawback the allowance from teachers by raising the fee they will be required to pay.

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input type="checkbox"/>	Disagree	X	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	----------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

The NASUWT questions the need to increase the fee since the number of registrants has increased considerably. This, of itself, will increase the income of the EWC.

Further, the Union maintains that if the fee is to be increased, then payment should be voluntary in order to establish the value registrants place on the work of the EWC.

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

The NASUWT is concerned that the proposals proffered in this consultation document, all of which seek to visit detriment on teachers,

could provide a stark warning of the implications for teachers working in Wales, if teachers' pay and conditions were devolved to the Welsh Government.

Name: **Sarah Lewis**

Organisation: **Estyn**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We agree with the principle of proportionality in respect of the difference in average earning between the groups of practitioners.

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers' Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
------------	-------------------------------------	-----------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We agree in principle, however, we believe that it is important that the EWC clarifies the benefits of registration for practitioners.

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Have you considered a scale within the higher fees, which takes account of those professionally qualified staff who because they are part-time are not paid as much as their full-time colleagues?

Name: **Gareth Newton**

Organisation: **Education and Training Standards (ETS) Wales: (Chair of ETS)**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We agree with this proposal. Registrant categories will encompass significant differences in regard to working patterns, full time or part time status, and salary earned. Given these factors, it is not desirable to set a single level of annual fee across all categories.

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers’ Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
------------	-------------------------------------	-----------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We agree that model 2 is both equitable and appropriate. We note that this model posits a slight increase in the annual fee to be charged to Youth Support Workers – from £15 a year to £18 a year – but we do not consider this to be an unreasonable increase. We recognise that a subsidy will continue to apply to Registrants under both model 1 and model 2.

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	-------------------------------------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2 X	£65	£20
3	£61	£25

4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

We would prefer to use the expression “equitable” rather than “fair” in this instance. In regard to the Welsh Government’s preferred fee model 1, the annual fee to be paid by Youth Support Workers is set at approximately one-third of that to be paid by Professional Youth Workers. We think this is an equitable and proportionate level. Option 2 under fee model 3 is the option that most closely represents the differential proposed under fee model 1. On that basis, we prefer option 2.

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Your name: **Hayden Llewellyn**

Organisation: **Education Workforce Council (EWC)**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

The Council supports the proposal to set fee levels according to practitioner / registrant categories. This will help to recognise and take account of the fact that the groups have differing roles, responsibilities and (in general) levels of income.

The Council understands that this was the view from the majority of

respondents to previous Welsh Government consultations on proposals for the registration of the wider education workforce in Wales.

This principle is also well established amongst a number of other regulators, for example in Dentistry where Dentists and Dental Care Professionals pay different amounts.

The Council wishes to highlight that while some respondents may state a preference for a system where fees are based on actual salary, the complexity, administrative burden and cost of running such a system, both for the EWC and employers would be problematic. In turn, it would result in an increase in registration fees to cover the additional costs. Council officers have previously provided details and costs to Welsh Government officials for such a system.

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers' Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
-----	--------------------------	----	-------------------------------------	----------------------------	--------------------------

Supporting comments

The Council is aware that since the issue of the consultation document, the settlement to teachers in the *STPCD* has now been removed. However, the Welsh Government still requires the approval of the National Assembly for Wales Finance Minister to transfer the sum of this money to the EWC. Given that this matter has yet to be fully concluded, the EWC answers the original question asked in this consultation.

The Council emphasises that the EWC must have registration fee levels for each registrant group that generate sufficient income to enable it to effectively carry out the functions set out in the Education (Wales) Act 2014 and to establish financial reserves that allow it to deal with unexpected costs. The Council confirms that based on its projections of registration numbers for 2017-18 onwards, model 2 would generate sufficient income to meet its operating costs.

However, the Council notes that if model 2 needs to be adopted, the Welsh Government is proposing to increase the registration fee for learning support staff from £15 in 2016-17 to £18 in 2017-18 but leave the fees for school and FE teachers unchanged. The Council invites the Welsh Government to reconsider this and suggests that it would be more appropriate to spread the very small increase between all registrant groups rather than attributing it just to learning support staff.

The Council saw a great deal of confusion by registrants and employers when collecting 2016-17 registration fees due to the way in which the Welsh Government chooses to present the table in paragraph 8.4. This resulted in incorrect fees being remitted and queries about subsidies that registrants believed they were entitled to. The Council remains concerned that this model is not simple and transparent and will continue to lead to confusion as to what the fee and subsidy levels actually are. Officers have discussed these points with Welsh Government officials previously.

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

The Council agrees with the proposal to base registration fees on scale 3 of the table, confirming that based on its projections of registration numbers for 2017-18 onwards, this would generate sufficient income to meet its operating costs.

The Council highlights that the lack of government subsidies under model 3 are likely to be unpopular with registrants and their trade unions, however, the EWC has no remit for pay, terms and conditions and thus it is for practitioner trade unions and others to argue the case for subsidies of the registration fee.

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

The Council notes that the questions asked in this consultation are the same or similar to those in the Welsh Government’s consultation which closed in November 2014 in relation to fees from April 2016-17. As such, the core of the EWC’s response reflects that of the GTCW in responding to the November 2014 consultation.

The Council has a number of additional comments it wishes to make in respect of registration fees:

- 1. The Welsh Government will inevitably receive responses to the consultation which advocate that registrants should not pay a registration fee. The Council however takes the view that a fee should be payable by registrants and therefore considers it appropriate to comment briefly on this matter here.**

It is an established principle in the UK and many other countries worldwide that professions which the public have a legitimate interest in, should be regulated in order to protect / safeguard the public. In practice, this means that:

- the public can be reassured that the people working in a particular profession are suitably qualified, their knowledge and skills are kept up to date and their conduct and competence is of an appropriate standard (they are fit to practise their profession);**
- those working within a particular profession are able to demonstrate that they:**
 - individually and collectively, have a commitment to maintaining and raising standards, in the interests of the public;**
 - are part of a profession of high status and standing, with specific entry requirements and expectations of conduct and competence rather than just being in a job which anybody can work in.**

In achieving these objectives, most regulatory bodies have broadly the same statutory responsibilities, which are to:

- maintain a Register of persons able to practise;**
- develop standards which those working within a profession**

- must comply with, including a Code of Practice and Conduct;
- develop standards for education and training, which those working within a profession must comply with;
 - deal with concerns raised about a person's "fitness" to practise their particular profession.

There are broadly speaking 2 models of regulation worldwide. One is that government regulates a particular profession and therefore the persons within that profession do not pay a fee. The second is that a profession has a stake in regulating itself. The second model is much more common and is regarded as the more preferable for the profession concerned as the profession itself is entrusted with certain responsibilities with minimal government intervention.

One factor with self-regulation is that those professionals have to pay for it. However, in the main such professions are prepared to do this in return for:

- having a level of control over their own registration and regulation;
- demonstrating that "what they do" is more than just an occupation, which anybody can do, but is a "profession", with specific standards for entry to that profession and for continued practice within that profession. Such an approach has potential knock-on benefits in terms of public perception / status and for negotiating pay, terms and conditions with government.

As stated earlier in this response, the Council takes the view that reimbursement of the fee is a separate consideration to the issue of the fee itself and is a matter that should be taken up with the Welsh Government by other organisations such as trade unions and associations.

2. The Council emphasises that the EWC must have registration fee levels for each registrant group that generate sufficient income to enable it to effectively carry out the functions set out in the Education (Wales) Act 2014 and also to begin to establish financial reserves that allow it to deal with unexpected costs.

The registration fees set for the education workforce are likely to be lower than those for other professions, however the fee needs to be kept under continuous review.

The Council understands that each of the fee models proposed in this consultation seeks to provide total annual fee income of approximately £3.4 million from 2017-18. The Council considers that this is an acceptable sum, however it is imperative that the fee levels must be kept under review and will inevitably increase over time.

3. Further to points 1 and 2, as an independent organisation it is essential that responsibility for setting registration fees is passed from the Cabinet Secretary to the EWC in order that it can determine its own fee structure based on the actual costs of its statutory work. Only the EWC will be able to determine these costs accurately through its planning and budgeting processes. At present, the EWC has to seek approval from the Minister for any increase in the registration fee. The Council welcomed statements made by the previous Minister during the debate on the Education (Wales) Bill that responsibility for fee-setting could be looked at again in the future. The EWC would urge the Cabinet Secretary to allow the EWC to set its own fee at an early opportunity.

Name: **Mary van den Heuvel**

Organisation: **ATL Cymru**

Our response

We welcome the opportunity to respond to this consultation on the setting of fees for registration with the Education Workforce Council Wales (EWC).

We firmly see any fees for the EWC as a tax on the whole education profession and believe that if the EWC is to charge fees then they must be a democratic body which is at least partly elected.

We note that the subsidy has been removed from the STPCD¹, which we are led to believe means the preferred model would be implemented. However, whilst we have concerns about the first model, should model 3 be needed instead we would be very strongly concerned. We would seek reassurance about where the monies previously given via the STPCD subsidy are now.

Our position on the EWC charging fees remains unchanged since the 2014 consultation. Therefore, this response is based on the conclusions of our previous work on the EWC. Please see the background to our response to the 2014 consultation:

“In order to respond to this consultation we asked our members to answer questions on the EWC and the level of fees suggested.² Of the members who responded, 47% were teachers, 18% FE lecturers and 14%

¹ <https://www.gov.uk/government/publications/school-teachers-pay-and-conditions-2016>

² We undertook an online survey with our membership, from 7 October to 26 October 2014.

support staff. Three quarters (74%) worked full time, and one quarter part time (26%).

Some key findings from our survey are:

Better communication with those expected to register is needed
Of FE lecturers we surveyed barely half (57%) knew that they had to register with the EWC from April 2015. There urgently needs to be clear communication with FE lecturers about the expectation on them to register and what they can expect from the EWC.

The suggested models for raising EWC fees are not good enough
Although happy to have some differentiation between teachers and support staff, when asked if there should be further levels of differentiation, less than one in ten (8%) were happy with the proposed categories alone. There was clear support for the fee level to be set according to actual pay (43%), and whether someone was working full or part-time (52%). Nearly one in three (29%) said it should also be based on pay grade.

There is a negative feeling about the EWC
In order to gain the trust and support of the education profession work needs to be undertaken to ensure there is sector buy in. Two thirds 66% of those who chose to leave a 'free' comment at the end of the survey expressed scepticism about the new body.

The STPCD should be redistributed amongst the whole work force
Seven in ten (71%) of our membership agree that the STPCD should be redistributed amongst the whole workforce. We believe every effort should be made to ensure that this happens.

More work needs to be done to ensure the EWC is fit for purpose and that the fee level is right, and that the EWC is fulfilling all its functions in order to gain buy-in and trust from the education profession."

The full 2014 consultation response can be seen at:

https://www.atl.org.uk/Images/ATL_Cymru_response_to_registration_fees_for_the_education_workforce_in_Wales.pdf

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	-------------------------------------	-----------------------------------	--------------------------

Supporting comments

We believe that not only should the employer be paying these fees, but that they should be based on the level of income which the individual earns.

In the same way that a local authority pays the fees for their lawyers to be part of a professional body, we would expect them to pay the fees for education professionals.

Further education professionals in particular may be on very part time contracts and expected to pay higher rates of fees than those earning more than them.

Should the fees be more in line with earnings we would be able to see this model as the better option.

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers’ Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
------------	--------------------------	-----------	-------------------------------------	-----------------------------------	--------------------------

Supporting comments

Whilst it is welcome that some fees appear to be going down we would question the parity for part-time staff.

The higher fee for work based learning professionals will do nothing to encourage recruitment in areas such as plumbing, where it is challenging to get the staff to teach in FEIs.

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	-------------------------------------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

As stated above we cannot agree with a model which does not take actual earnings into account.

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Name: **Eirian Davies**

Organisation: **Coleg Sir Gar**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	X	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	----------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We agree that categories are appropriate and that registration of the groups named recognises the professional nature of the work they undertake.

However, we are concerned that WBL practitioners are being considered in the same category as FE lecturers in the costing models as their salaries are not comparable. WBL practitioner’s salaries are comparable with those of youth support workers.

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers’ Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	X	Neither agree nor disagree	<input type="checkbox"/>
------------	--------------------------	-----------	----------	-----------------------------------	--------------------------

Supporting comments

As for the above the concern is with the rates suggested. WBL practitioners’ salaries are significantly lower than FE teachers and we feel the contribution expected should reflect this.

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input type="checkbox"/>	Disagree	X	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	----------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25

4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

Again the concern is the grouping of WBL practitioners with that of FE lecturers. This should be equal to that of your support workers.

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Enw: **Rebecca Williams, Swyddog Polisi**

Sefydliad: **UCAC**

Cwestiwn 1 – A ydych yn cytuno y dylai lefel y ffioedd gael ei phennu yn ôl categorïau ymarferwyr, hynny yw athrawon ysgol, athrawon (darlithwyr) AB, gweithwyr ieuenctid, gweithwyr cymorth ieuenctid, ymarferwyr dysgu seiliedig ar waith, gweithwyr cymorth dysgu addysg bellach/mewn ysgolion?

Cytuno	✓	Anghytuno	<input type="checkbox"/>	Ddim yn cytuno nac yn anghytuno	<input type="checkbox"/>
---------------	---	------------------	--------------------------	--	--------------------------

Sylwadau ategol

Cytunwn ei fod yn rhesymol i bennu ffioedd yn ôl categorïau ymarferwyr gan fod gwahaniaethau sylweddol o ran cyflog rhwng y categorïau. Er nad yw'r ymgynghoriad hwn yn gofyn am farn yn benodol ar y mater, cymrwn y cyfle i ail-ddatgan ein pryder ynghylch ehangu aelodaeth Cyngor y Gweithlu Addysg i gynnwys gweithwyr ieuenctid a gweithwyr cymorth ieuenctid.

Nid yw gweithwyr ieuenctid yn rhan o'r gweithlu addysg fel y'i deallir yn gyffredinol. Hynny yw, nid ydynt fel arfer yn gweithio mewn lleoliad/sefydliad addysg, nac yn cael eu cyflogi gan leoliad/sefydliad o'r fath, ac nid addysgu ffurfiol yw eu prif swyddogaeth.

Teimla UCAC y byddai cynnwys y grŵp hwn o weithwyr fel aelodau o Gyngor y Gweithlu Addysg yn ehangu aelodaeth y corff gam yn rhy bell,

ac yn ei gwneud hi'n anoddach i gadw ffocws priodol ar flaenoriaethau'r gweithlu addysg.

Yn ogystal, ni theimlwn fod Cyngor y Gweithlu Addysg wedi cael cyfle i wneud gwaith digonol hyd yma o ran creu safonau proffesiynol, strwythur gyrfa a phennu cymwysterau ar gyfer staff cymorth dysgu (ysgolion a cholegau addysg bellach). Teimlwn mai gwell fyddai canolbwyntio ar y gwaith pwysig hwn cyn ymestyn y cwmpas i gynnwys gweithlu arall sy'n gymhleth ac amrywiol iawn ei natur.

Mi allai, felly, fod yn niweidiol i'r Cyngor ei hun, ei hygredd ac 'integriti' ei weledigaeth.

Cwestiwn 2 – Ar hyn o bryd, mae'r Ysgrifennydd Gwladol dros Addysg yn ystyried diwygio'r *Ddogfen Cyflog ac Amodau Athrawon (STPCD)*, sef dileu'r cyfeiriad a wneir i'r lwfans presennol ar gyfer athrawon mewn ysgolion a gynhelir yng Nghymru, er mwyn i'r lwfans gael ei ailddosbarthu ar draws y gweithlu ehangach, gan leihau'r ffi ar gyfer pawb sy'n cofrestru o 2017 ymlaen, fel yr awgrymir o dan fodel 1.

Os **nad oes modd** diwygio'r *STPCD*, a ydych yn cytuno bod model 2 yn fodel teg ac addas, er mwyn codi'r arian y bydd ei angen ar Gyngor y Gweithlu Addysg?

Ydw	<input type="checkbox"/>	Nac ydw	<input checked="" type="checkbox"/>	Ddim yn cytuno nac yn anghytuno	<input type="checkbox"/>
-----	--------------------------	---------	-------------------------------------	---------------------------------	--------------------------

Sylwadau ategol

Mae UCAC o'r farn mai'r cyflogwr ddylai dalu ffioedd cofrestru Cyngor y Gweithlu Addysg yn llawn.

Ymhellach, nid yw'r ddogfen ymgynghorol yn ei gwneud yn glir pam ddylai Model 2 fod yn wahanol i Fodel 1. Mae paragraff 8.3 (ii) yn dweud 'heb y diwygiad angenrheidiol i'r Ddogfen, ni châi digon o gymhorthdal ei gynhyrchu o ganlyniad i'r niferoedd uwch na'r disgwyl o GCD... i allu cadw'r ffi ar gyfer y gweithlu ehangach ar £15'. Mae niferoedd y GCD yr un fath p'un ai yw'r arian yn dod drwy'r Ddogfen i Awdurdodau Lleol ac yn cael ei ailgyfeirio drwy ffioedd athrawon, neu os yw'r arian yn dod fel cyllid bloc yn syth i Lywodraeth Cymru ac oddi yno i'r Cyngor.

Os mai ehangu cwmpas y Cyngor i gynnwys gweithwyr ieuenctid a gweithwyr cymorth dysgu (h.y. taenu cymhorthdal athrawon ysgol hyd yn oed yn deneuach), mae hynny'n reswm arall eto dros beidio ag ymestyn y cwmpas.

Cwestiwn 3a - Os na fydd yr arian ar gyfer y cymhorthdal ar gael, bydd angen defnyddio model 3. A ydych yn cytuno â'r cynnig i seilio'r ffioedd ar raddfa 3 y tabl, fel yr amlinellir ym mharagraffau 9.1 - 9.6 yr ymgynghoriad?

Cytuno	<input type="checkbox"/>	Anghytuno	<input type="checkbox"/>	Ddim yn cytuno nac yn anghytuno	<input checked="" type="checkbox"/>
--------	--------------------------	-----------	--------------------------	---------------------------------	-------------------------------------

Cwestiwn 3b – Os byddwch yn anghytuno â defnyddio graddfa 3 model 3, nodwch pa raddfa a fyddai'n well i'w defnyddio drwy roi tic ym mlwch perthnasol y tabl isod:

Opsiw'n ffioedd	Athrawon ysgol, addysg bellach, gweithwyr ieuencid ac ymarferwyr dysgu seiliedig ar waith	Gweithwyr cymorth dysgu mewn ysgolion ac addysg bellach a gweithwyr cymorth ieuencid
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Sylwadau ategol

Cwestiwn 4 – Rydym wedi gofyn nifer o gwestiynau penodol. Os oes gennych chi faterion perthnasol nad ydym wedi rhoi sylw penodol iddynt, defnyddiwch y blwch isod i roi gwybod i ni amdanynt.

Noda'r ddogfen ymgynghorol ym mharagraff 5.3 fod y Cyngor 'yn ystyried ffyrdd o symleiddio ei wasanaethau a lleihau ei gostau gweithredu yn barhaus.'

Mae gennym bryder penodol ynghylch un o weithdrefnau'r Cyngor a allai arwain at wastraff adnoddau difrifol. Mae'r pryder ynghylch geiriad Adran 8, cwestiwn 3 y datganiad ar y ffurflen gofrestru. Mae'n gofyn i rywun sy'n ymgeisio i gofrestru â'r Cyngor i ddatgan 'unrhyw gamau gweithredu neu ymchwiliad a gynhaliwyd drwy gydol hanes eich cyflogaeth ac nid cyflogaeth yn ymwneud â gwaith yn y sector Addysg yn unig'.

Er ein bod yn eithriadol o ymwybodol o'r angen i sicrhau prosesau diogelwch, mae gennym wrthwynebiad mewn egwyddor i'r cais hwn am wybodaeth – sy'n cynnwys achosion ble canfuwyd nad oedd achos i'w ateb, neu ble na arweiniodd at gamau disgyblu.

Ond o safbwynt yr ymgynghoriad hwn, sy'n gofyn ynghylch codi ffioedd ar y gweithlu addysg – yng nghyd-destun gwerth am arian, mae UCAC

yn gadarn iawn o'r farn na ddylai Cyngor y Gweithlu Addysg fod yn treulio amser ac adnoddau'n ymchwilio i ffug-gyhuddiadau, a materion lefel isel mewn cannoedd neu filoedd o achosion.

Name: **Rob Williams (Director of Policy)**

Organisation: **NAHT Cymru**

NAHT welcomes the opportunity to submit a response to the consultation. NAHT represents more than 29,000 school leaders in early years, primary, secondary and special schools, making us the largest association for school leaders in the UK. We represent, advise and train school leaders in Wales, England and Northern Ireland. We use our voice at the highest levels of government to influence policy for the benefit of leaders and learners everywhere. Our new section, NAHT Edge, supports, develops and represents middle leaders in schools.

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

The response to the above question does not alter our assertion that the principle of requiring a fee for professional registration during a significant period of time when pay levels in the public sector have seen real terms cuts is both unacceptable and unfair.

- NAHT Cymru assert that the fees should be paid for by the employer or as a minimum that the level of fee that is ultimately set should be included as a salary increase for the financial year when the fee first begins**
- The level of fee should be proportionate and not significantly impact upon the workforce**

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers' Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?**

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
------------	-------------------------------------	-----------	--------------------------	-----------------------------------	--------------------------

Supporting comments

The response to the above question does not alter our assertion that the principle of requiring a fee for professional registration during a significant period of time when pay levels in the public sector have seen real terms cuts is both unacceptable and unfair.

•NAHT Cymru assert that the fees should be paid for by the employer or as a minimum that the level of fee that is ultimately set should be included as a salary increase for the financial year when the fee first begins

•The level of fee should be proportionate and not significantly impact upon the workforce

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

The response to the above question does not alter our assertion expressed in the responses to questions 1 and 2

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

As one of the key aims of the EWC is to contribute to the improvement of standards of teaching and the quality of learning in Wales, and within that role support the principles of the New Deal and related continuous professional development of the workforce, it would be useful to establish how the EWC is able to fulfil that additional role.

- **What role will the EWC undertake in terms of professional development?**
- **Are there additional resource / cost implications for the EWC in order to fulfil this role?**
- **In the future, will any additional resource needs required to fulfil this training role, ultimately have an impact upon EWC fees?**

Name: **Jackie Beckett**

Organisation: **B-wbl Consortium**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We agree that categories are appropriate and recognise how by considering school and FE teachers, Youth Workers and WBL practitioners together helps to recognise the professional nature of the work they complete.

However, we are concerned that WBL practitioners are being considered alongside FE teachers in the costing models as salaries are not comparable. WBL practitioners' salaries are more comparable with those of youth support workers.

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers' Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
-----	--------------------------	----	-------------------------------------	----------------------------	--------------------------

Supporting comments

As above the concern is with the rates suggested. WBL practitioners' salaries are lower than FE teachers and we feel the contribution expected should reflect this.

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
-------	--------------------------	----------	-------------------------------------	----------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

The concern is not the scale so much but the grouping of WBL practitioners with FE teachers. We feel practitioners should not be expected to pay the same contribution as teachers.

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

--

Enw: **Enid Williams**

Sefydliad: **Gwasanaeth Ieuentid Ynys Mon**

Cwestiwn 1 – A ydych yn cytuno y dylai lefel y ffioedd gael ei phennu yn ôl categorïau ymarferwyr, hynny yw athrawon ysgol, athrawon (darlithwyr) AB, gweithwyr ieuentid, gweithwyr cymorth ieuentid, ymarferwyr dysgu seiliedig ar waith, gweithwyr cymorth dysgu addysg bellach/mewn ysgolion?

Cytuno	X	Anghytuno	<input type="checkbox"/>	Ddim yn cytuno nac yn anghytuno	<input type="checkbox"/>
---------------	----------	------------------	--------------------------	--	--------------------------

Sylwadau ategol

--

Cwestiwn 2 – Ar hyn o bryd, mae'r Ysgrifennydd Gwladol dros Addysg yn ystyried diwygio'r *Ddogfen Cyflog ac Amodau Athrawon (STPCD)*, sef dileu'r cyfeiriad a wneir i'r lwfans presennol ar gyfer athrawon mewn ysgolion a gynhelir yng Nghymru, er mwyn i'r lwfans gael ei ailddosbarthu ar draws y gweithlu ehangach, gan leihau'r ffi ar gyfer pawb sy'n cofrestru o 2017 ymlaen, fel yr awgrymir o dan fodel 1.

Os **nad oes modd** diwygio'r *STPCD*, a ydych yn cytuno bod model 2 yn fodel teg ac addas, er mwyn codi'r arian y bydd ei angen ar Gyngor y Gweithlu Addysg?

Ydw	X	Nac ydw	<input type="checkbox"/>	Ddim yn cytuno nac yn anghytuno	<input type="checkbox"/>
------------	----------	----------------	--------------------------	--	--------------------------

Sylwadau ategol

--

Cwestiwn 3a – Os na fydd yr arian ar gyfer y cymorthdal ar gael, bydd angen defnyddio model 3. A ydych yn cytuno â'r cynnig i seilio'r ffioedd ar raddfa 3 y tabl, fel yr amlinellir ym mharagraffau 9.1 – 9.6 yr ymgynghoriad?

Cytuno	X	Anghytuno	<input type="checkbox"/>	Ddim yn cytuno nac yn anghytuno	<input type="checkbox"/>
---------------	----------	------------------	--------------------------	--	--------------------------

Cwestiwn 3b – Os byddwch yn anghytuno â defnyddio graddfa 3 model 3, nodwch pa raddfa a fyddai'n well i'w defnyddio drwy roi tic ym mlwch perthnasol y tabl isod:

Opwin ffioedd	Athrawon ysgol, addysg bellach, gweithwyr ieuentid ac ymarferwyr dysgu seiliedig ar waith	Gweithwyr cymorth dysgu mewn ysgolion ac addysg bellach a gweithwyr cymorth ieuentid
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Sylwadau ategol

Graddfa 1

Cwestiwn 4 – Rydym wedi gofyn nifer o gwestiynau penodol. Os oes gennych chi faterion perthnasol nad ydym wedi rhoi sylw penodol iddynt, defnyddiwch y blwch isod i roi gwybod i ni amdanynt.

Dylid ystyried bod y mwyafrif o Weithwyr Ieuentid Rhan-amser yn gwneud eu Cwrs Hyfforddiant yn ystod eu blwyddyn neu 2 gyntaf mewn gwaith. Nid yw'n bosib felly i ddweud na chaiff person weithio fel Gweithiwr Ieuentid heb gofrestru. Hefyd, er mwyn medru penodi siaradwyr Cymraeg bron yn ddieithriad mae Gweithwyr Ieuentid Proffesiynol yn gorfod ennill cymhwyster ar ol cael eu penodi i swydd. Mae hyn yn wahanol i gofrestru athrawon, sydd ddim yn gallu ymgeisio am swydd heb gymhwyster, neu Gymorthyddion, lle nad oes angen cymhwyster. Mae angen nodi trefniant arbennig felly ar gyfer Gweithwyr Ieuentid dan hyfforddiant

Enw: **Nia Morris**

Sefydliad: **Gwasanaeth Ieuenctid Gwynedd**

Cwestiwn 1 – A ydych yn cytuno y dylai lefel y ffioedd gael ei phennu yn ôl categorïau ymarferwyr, hynny yw athrawon ysgol, athrawon (darlithwyr) AB, gweithwyr ieuenctid, gweithwyr cymorth ieuenctid, ymarferwyr dysgu seiliedig ar waith, gweithwyr cymorth dysgu addysg bellach/mewn ysgolion?

Cytuno	X	Anghytuno	<input type="checkbox"/>	Ddim yn cytuno nac yn anghytuno	<input type="checkbox"/>
---------------	----------	------------------	--------------------------	--	--------------------------

Sylwadau ategol

--

Cwestiwn 2 – Ar hyn o bryd, mae'r Ysgrifennydd Gwladol dros Addysg yn ystyried diwygio'r *Ddogfen Cyflog ac Amodau Athrawon (STPCD)*, sef dileu'r cyfeiriad a wneir i'r lwfans presennol ar gyfer athrawon mewn ysgolion a gynhelir yng Nghymru, er mwyn i'r lwfans gael ei ailddosbarthu ar draws y gweithlu ehangach, gan leihau'r ffi ar gyfer pawb sy'n cofrestru o 2017 ymlaen, fel yr awgrymir o dan fodel 1.

Os **nad oes modd** diwygio'r *STPCD*, a ydych yn cytuno bod model 2 yn fodel teg ac addas, er mwyn codi'r arian y bydd ei angen ar Gyngor y Gweithlu Addysg?

Ydw	X	Nac ydw	<input type="checkbox"/>	Ddim yn cytuno nac yn anghytuno	<input type="checkbox"/>
------------	----------	----------------	--------------------------	--	--------------------------

Sylwadau ategol

--

Cwestiwn 3a – Os na fydd yr arian ar gyfer y cymorthdal ar gael, bydd angen defnyddio model 3. A ydych yn cytuno â'r cynnig i seilio'r ffioedd ar raddfa 3 y tabl, fel yr amlinellir ym mharagraffau 9.1 – 9.6 yr ymgynghoriad?

Cytuno	X <input type="checkbox"/>	Anghytuno	<input type="checkbox"/>	Ddim yn cytuno nac yn anghytuno	<input type="checkbox"/>
---------------	--------------------------------------	------------------	--------------------------	--	--------------------------

Cwestiwn 3b – Os byddwch yn anghytuno â defnyddio graddfa 3 model 3, nodwch pa raddfa a fyddai'n well i'w defnyddio drwy roi tic ym mlwch perthnasol y tabl isod:

Opwin ffioedd	Athrawon ysgol, addysg bellach, gweithwyr ieuenctid ac	Gweithwyr cymorth dysgu mewn ysgolion ac addysg bellach a
---------------	--	---

	ymarferwyr dysgu seiliedig ar waith	gweithwyr cymorth ieuenctid
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Sylwadau ategol

Graddfa 1

Cwestiwn 4 – Rydym wedi gofyn nifer o gwestiynau penodol. Os oes gennych chi faterion perthnasol nad ydym wedi rhoi sylw penodol iddynt, defnyddiwch y blwch isod i roi gwybod i ni amdanynt.

Dylid ystyried bod y mwyafrif o Weithwyr Ieuenctid Rhan-amser yn gwneud eu Cwrs Hyfforddiant yn ystod eu blwyddyn neu 2 gyntaf mewn gwaith. Nid yw'n bosib felly i ddweud na chaiff person weithio fel Gweithiwr Ieuenctid heb gofrestru. Hefyd, er mwyn medru penodi siaradwyr Cymraeg mae Gweithwyr Ieuenctid Proffesiynol yn gorfod ennill cymhwyster ar ol cael eu penodi i swydd. Mae pob aelod o staff sydd wedi eu penodi ganddom wedi gorfod ennill cymhwyster tray n gwneud y gwaith. Mae hyn yn wahanol i gofrestru athrawon, sydd ddim yn gallu ymgeisio am swydd heb gymhwyster, neu Gymorthyddion, lle nad oes angen cymhwyster. Mae angen nodi trefniant arbennig felly ar gyfer Gweithwyr Ieuenctid dan hyfforddiant.

Name: **Lisa Edwards, Policy and Communications Officer**

Organisation: **UCU Wales**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input type="checkbox"/>	Disagree	x	Neither agree nor disagree	<input type="checkbox"/>
-------	--------------------------	----------	---	----------------------------	--------------------------

Supporting comments

Fee levels should be related to income, not category. Our response is unchanged from the 2014 Fees Consultation: “The proposed system for setting the level of fee, is based on the premise that on average teachers and lecturers will earn more than learning support assistants. However it is very likely that a full time LSA could receive a higher salary than a part time hourly paid teacher or lecturer. As the role of the Council will not differ according to registration category, this does not seem to be the most appropriate way of deciding the fee level. The costs of running the EWC will presumably be dependent on the number of registrants and the work that this involves. The cost of disciplinary procedures for example, will not be determined by category of registrant. If it is considered necessary to charge employees, then in our opinion any fee payable should be determined on a sliding scale, based on the ability to pay and not on a categorisation determined by the savings to be made by the administrators and the employers”

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers’ Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
-----	--------------------------	----	--------------------------	----------------------------	--------------------------

Supporting comments

Any allowance/subsidy, should be spread evenly across the entire workforce, however, we do not consider that individual registrants should be subject to fees. It is our opinion that the costs of the EWC should be met by the Welsh Government or the employers.

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input type="checkbox"/>	Disagree	x	Neither agree nor disagree	<input type="checkbox"/>
-------	--------------------------	----------	---	----------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

Fees should not be based on categories but on individual income. This makes the assumption that registrants in one category will on average earn more than others. Part time hourly paid members of staff are already disadvantaged in as much as they often have low income and face job insecurity; it would seem inappropriate to penalise them and their families further. The table of examples above, highlights the inequality that would be produced by using a flat rate method. This clearly does not meet the key principle of ‘proportionality’. However our members are very clear that it should not be individual registrants who foot the bill, as they are not convinced of the benefits of the Education Workforce Council as it stands, to them as professionals.

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

UCU Wales still has an issue with members paying to belong to a body that does not represent them. There are currently no perceived benefits to our members; Welsh Government proposals for the role of the EWC are based on school needs and often ignore the role of and input from FE lecturers. If Welsh Government is serious about improving quality and standards in teaching and learning, and in maintaining and improving professional

conduct in further education, genuine engagement with lecturers is crucial. There are fundamental issues that need to be addressed, such as:

- *unmanageable workloads;
- *meaningful opportunities for professional development and reflective practice;
- *the overuse of fixed term hourly paid lecturers and
- *the use of agency workers.

Simply dealing with the consequences through the use of disciplinary panels, will not enhance the quality and professional standards aspired to. We need to deal with the causes.

It is interesting to note that

“Maintaining public trust and confidence” and
“Safeguarding the interest of parents and the general public”
are no longer listed as aims of the EWC. If the EWC not considered to be of benefit to these groups, and can offer nothing constructive for our members either, it raises the question of the purpose and existence of such a body for staff in FE and particularly, why they should be compelled to pay a fee, over which they have no control.

Currently it appears to our members that the EWC does nothing but give rise to public humiliation of colleagues, before a final decision has even been made.

We agree that professional status and career pathways for FE lecturers need to be enhanced and promoted, and will gladly continue to work in partnership with the EWC and Welsh Government to achieve this. We are encouraged by recent developments in CPD, the PLP and Professional Standards; but as yet there is very little that the EWC has to offer our members in exchange for any increase in the fee.

Name: **Amber Courtney**

Organisation: **UNISON Cymru/Wales**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
--------------	--------------------------	-----------------	--------------------------	-----------------------------------	-------------------------------------

Supporting comments

Foremost, UNISON's position remains unchanged – we cannot endorse low paid Support Workers paying a fee for EWC registration.

UNISON does not believe it is sufficient to set the fee level by practitioner category alone. If workers are to be expected to pay registration fees then this fee should reflect the pay and circumstances of its members, particularly part time workers and those receiving term-time only pay.

The proposed models do not make any differentiation between full and part time workers and that is a concern to UNISON as this will disproportionately affect support staff. The 2015/16 Pupil Level Annual School Census (PLASC) for Wales shows that 51% of support staff work part-time compared to 19% of teaching staff. This highlights the disproportionate effect this decision will have on the lowest paid members of staff.

The decision not to differentiate between full and part-time workers also ignores a serious inequality experienced by many support staff, which is term time only pay. This leads to lower pay for these workers not accounted for in the models proposed within this consultation. Staff working fewer hours will be unfairly penalised.

Furthermore, there must be assurances that, despite the proposed differential in registration fees, that each staff group be given parity in terms of quality of service they receive from the EWC.

Qualified teachers in schools and lecturers in Further Education benefit from nationally agreed terms and conditions, pay levels, progression and professional development which reflect their status. Pay levels for support staff are often low and don't recognise the level of professional commitment and dedication to their pupils that is expected of them in practice. There is no clarity in regard to professional boundaries of support staff roles, no professional standards, no clear structure, varied rates of pay, no standard job descriptions, and hundreds of job titles covering the same roles. Additionally, support staff have had little access to training and development and what little that is available is susceptible to cuts.

Under the current circumstances described in this response, the EWC is only able to provide a sub-standard service for support staff. The education system typically focuses on teaching staff – a situation UNISON sees repeatedly replicated in negotiations. The most basic example of differential treatment is the reference in the EWC code of conduct to professional standards which don't exist for the majority of support staff. This is a fundamental requirement of code of conduct that omits a significant proportion of the workforce. Furthermore, the New Deal proposals linked to Donaldson's curriculum reform are largely focussed on teachers.

Without addressing the issues of disparity in the sector, there will be no value to registering irrespective of the cost.

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers’ Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
------------	--------------------------	-----------	--------------------------	-----------------------------------	-------------------------------------

Supporting comments

UNISON has concerns around both models 1 and 2. Our view is that the registration fee and the contribution should be the same and that the subsidy should not be a factor in deciding the payable amount. Whilst we appreciate the attempt to provide financial assistance to the lower paid members of the workforce, there is no guarantee that the subsidy will remain an available and viable method of offsetting the cost to the individual. If the subsidy funding becomes unavailable then school support staff will pay a high personal cost and there will be no adequate mechanism available to protect them from such a hike.

Furthermore, when the registration fee is considered, UNISON cannot agree that all staff groups should have a fee of £46. The differentials in pay between the different groups are significant and we would argue that those who earn more should have a higher registration fee applied to them. Similarly, with model 2 we cannot agree that there is currently parity between youth workers and youth support workers, for example, and so it is unreasonable for them to both be registered at £46, irrespective of the subsidy and actual contribution for the reasons outlined above.

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	-------------------------------------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

UNISON believes that increasing the charge of registration for support staff would cause serious problems both for the individual workers and for the loss of confidence they would experience in the Workforce Council. Support staff have reported to us that any additional costs are a burden at a time when family budgets are already stretched and reliance on 'in work' benefits is higher than ever. Furthermore, we have growing concerns about the use of zero hours contracts and agency staff in the education sector. These contracts offer no job security and make it extremely difficult for people to forward plan their budgets, so registration fees generally and any rise in those fees can have a significant negative impact on a person's finances.

The necessary funding and resources for the work of the EWC need to be guaranteed by the Welsh Government if the body is truly considered to necessary and important.

Furthermore, the wording of the consultation implies that the move to model 3 would be triggered automatically and there would be no further consultation. UNISON strongly disagrees with this.

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

UNISON remains of the view that, irrespective of the fee model adopted, registration fees for support staff should be paid by the Welsh Government, local authorities, or employers. The burden of payment

should not fall upon the shoulders of members of the workforce who are often on low paid, term-time only contracts.

Many of work based learning practitioners are employed in the private sector and are being required to register with the EWC. However, we note that the workforce in private schools in Wales, including teaching and support staff, is not required to do so. If possible we believe this discrepancy should be addressed.

It is worth considering, as a separate point, that many support staff, particularly in a school environment, are required to offer increasingly intimate care for young people as part of their work, including the administration of medication, such as insulin, and use of catheters etc. Our members tell us that they are often asked to do such work without the necessary training and guidance. The delivery of such sensitive care to young people could engender the risk of disciplinary action for professional misconduct for members. Clear role profiles and appropriate training provision is obviously of paramount importance to minimise the risk to both pupils and registrants.

Additionally, recent figures have indicated there are significantly more learning support staff in Wales than originally reported and so this will have a positive impact in terms of income for the EWC and therefore should be reflected in the registration rate of learning support staff.

Name: **Jeff Protheroe**

Organisation: **National Training Federation for Wales (NTfW)**

The National Training Federation for Wales (NTfW) is a membership organisation of over 100 organisations involved in the delivery of learning in the workplace. It is a Wales wide representative body for all those organisations or individuals involved in the training industry. Members range from small specialist training providers to national and international organisations, as well as Local Authorities, Further Education Institutions and third sector organisations.

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

NTfW agrees with the principle that the fee level should be set as to reflect the varying salary scales across the whole education workforce. NTfW also believes that there should be no differentiation between part-time and full-time staff, as this has the potential of being a complex (and costly) administrative ‘burden.’

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers’ Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	----------------------------	--------------------------

Supporting comments

NTfW believes that it would be an unfortunate situation if the Welsh Government were not able to amend the STPCD, and were therefore required to adopt a situation where registration fees for School Teachers are being set artificially high, in order that subsidies can be maintained. Ultimately, the individual practitioner (or indeed their employer) will still need to contribute themselves

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
-------	-------------------------------------	----------	--------------------------	----------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25

4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

NTfW feels that in a situation where individual practitioners (or indeed their employers) need to fund the EWC directly, then the model adopted needs to be fair and equitable.

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Name: **Claire Roberts**

Organisation: **ColegauCymru**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	V	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	----------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

At present the fee level should be set according to practitioner categories. This model allows for the fee level to consider level of responsibility, role and status and sets the amount accordingly. Not to say that this will not need to be reviewed or re-evaluated in the future.

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers' Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* cannot be amended, do you agree that model 2

is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
------------	--------------------------	-----------	-------------------------------------	-----------------------------------	--------------------------

Supporting comments

Fee model 1 is the preferred model.

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

The preferred fee model is Fee model 1.

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

We welcome the rational of spreading the subsidy more widely to support the wider workforce of practitioners in Wales and eagerly await implementation in April 2017. Consistent and fair policy decisions and developments considering outcomes on the whole education sector are welcomed by ColegauCymru.

Name: **Tim Pratt**

Organisation: **ASCL Cymru**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	x	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	----------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers' Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	x	No	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
------------	----------	-----------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We agree this is an appropriate option, but only if necessary.

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	x	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	----------	-----------------	--------------------------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

It is important that the system be easy to understand for practitioners, and easy to administer, to avoid any confusion.

Name: **Ian Toone**

Organisation: **Voice the Union**

Question 1 – Do you agree that the fee level should be set according to practitioner categories, i.e. school teachers, FE teachers (lecturers), youth workers, youth support workers, work-based learning practitioners, school/FE learning support workers?

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	-------------------------------------	-----------------------------------	--------------------------

Supporting comments

We are in agreement with the general principle that the fee level should be commensurate with earnings. Whilst differentiation by practitioner category may appear to be the most appropriate way of achieving this, consideration should also be given to an additional level of differentiation so that those who are part-time (in any category) should not be disadvantaged by having to pay the same fee as someone who is full-time in the same practitioner category. Negotiations should also be held with employers with a view to securing their agreement to pay fees on behalf of their employees. This is especially important for teachers, as payment of this fee by a third party has, historically, been a statutory entitlement for school teachers and, therefore, an essential part of the remuneration element of their terms and conditions of service.

Question 2 – The Secretary of State for Education is currently considering an amendment to the *School Teachers’ Pay and Conditions Document (STPCD)* to remove the reference to the existing allowance for teachers in maintained schools in Wales, in order for the allowance to be redistributed across the whole workforce, reducing the fee for all registrants from 2017, as suggested under model 1. If the *STPCD* **cannot** be amended, do you agree that model 2 is a fair and appropriate model in order to raise the funding that the Education Workforce Council will require?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
------------	--------------------------	-----------	-------------------------------------	-----------------------------------	--------------------------

Supporting comments

We are concerned that increases in contributions are being made to those categories of workers who are least able to afford it. We do not accept the premise that ‘without the necessary amendment to the STPCD, there would not be enough subsidy generated as a result of the higher than expected numbers of LSW’s (30,000 approx.), for the fee for the wider workforce to remain at £15’. An increase in registrants would, in most organisations facilitate greater economies of scale and, therefore, greater efficiency. In such circumstances, one might expect fees to decrease rather than increase. After all, an increase in registrants will lead to an increase in income for the EWC, even if fee levels remain unchanged.

Question 3a – If the funding for the subsidy becomes unavailable, model 3 will be required. Do you agree with the proposal to base the fees on scale 3 of the table, as highlighted in paragraphs 9.1–9.6 of the consultation?

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	-------------------------------------	-----------------------------------	--------------------------

Question 3b – If you disagree with the use of scale 3 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below.

Fee option	School, FE teachers, youth workers and work-based learning practitioners	School and FE learning support workers and youth support workers
1	£68	£15
2	£65	£20
3	£61	£25
4	£58	£30
5	£54	£35
6	£51	£40
7	£46	£46

Supporting comments

Whilst we agree with the principle of proportionality, we believe that, if funding for the subsidy becomes unavailable, attempts should first be made to secure alternative funding (primarily from employers) before any attempt is made to pass on costs direct to registrants. We are aware that at least half of all local authorities in Wales are already paying registration fees on behalf of school support staff, which provides evidence that negotiations with local authorities (and other employers) are worth pursuing.

Question 4 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

As the EWC is still relatively new, there is an urgent need for the EWC to establish its credibility and to win the trust and confidence of all categories of registrants by showing that it can add value by championing registrants and providing high quality and much needed continuing professional development, rather than emphasising its regulatory functions at the expense of its support functions.