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Consultation – summary of response

Registration fees for the education workforce in Wales (2017)

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Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Registration fees for the education workforce in Wales (2017)

Audience	All bodies involved in the education fields including unions, FE colleges, employment agencies, local authorities, education training providers and awarding bodies.
Overview	This document provides a summary of responses and feedback about the consultation on the principles of registration fees for the wider workforce in Wales.
Action required	None – for information only
Further information	<p>Enquiries about this document should be directed to: Nathan Huish Practitioner Standards and Professional Development Division The Education Directorate Welsh Government Cathays Park Cardiff CF10 3NQ e-mail: ewc.enquiries@wales.gsi.gov.uk</p> <p>Tel: 029 2082 3039</p>
Additional copies	<p>This document can be accessed from the Welsh Government's website at https://consultations.gov.wales/consultations/registration-fees-education-workforce-wales</p>
Related documents	<p><i>Registration fee for the education workforce in Wales (2017) (2017) Consultation document</i> <i>Proposal for the registration of school learning support workers with the Education Workforce Council (2015)</i> <i>Registration of work based learning practitioners (2016)</i> <i>Proposed registration of youth workers (2016)</i></p>

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Background

The Education (Wales) Act 2014 (the 2014 Act) established the Education Workforce Council (“the Council”), this happened on 1 April 2015. From this date, there was a new requirement for all Further Education (FE) teachers to professionally register, and as of 1 April 2016, registration was widened to include both school and FE based Learning Support Workers.

From 1 April 2017, it is the intention that Youth Workers and Work Based learning practitioners will be registered.

The Act gives the Welsh Ministers the power to make regulations in relation to fees payable for registration with the Council. On 27 June 2016, the Welsh Government launched an 8 week consultation seeking your views on the proposals for the registration fee model. Your views and comments will help and inform the development of a new set of regulations to be made under the Act and in place for registration from 1 April 2017.

The consultation

The consultation was circulated across a number of key sectors including stakeholder and practitioners, using a range of networks.

49 written responses to the consultation were received.

The responses were received from the following sectors

Respondent	Number of responses
Unions	9
Local Authorities	4
Schools, Colleges and Universities	16
Work Based Learners	1
Education Training Providers	3
National Organisations and Charities	3
Youth Workers	5
Consortia	1
Individuals	7
Total	49

This document sets out the results of the consultation structured around the responses to each question. It does not aim to capture every point raised by respondents, but rather highlights the key issues and themes. A list of respondents along with their responses can be seen in a separate Annex.

Summary of responses

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?

Consultation response:

We received 49 responses to this question. 35 respondents agreed that the fee should be set according to practitioner categories, 7 respondents disagreed; and 7 respondents either chose not to respond or neither agreed or disagreed to the question.

The majority of respondents who answered this question were in favour that the fee should be set by practitioner categories, whilst some provided supporting comments, many merely agreed and didn't justify their decision.

A number of respondents felt that the registration fee should reflect the level of their earnings regardless of the category of registration.

Some of the common themes raised by respondents are listed below:

- 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'.
- 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
- (ETS Wales). We agree with this proposal
- 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.
- The PYOG agrees that fee levels should reflect the ability of groups of workers to pay registration fees i.e. that lower paid workers should pay a lower fee than those on higher pay structures.
- Everyone in education have one common goal - to educate the public. Therefore I believe that everyone should pay the same registration fee.

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

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?*

Consultation response

We received 49 responses to this question. 20 respondents said yes that model two was a fair and appropriate model to use if the STPCD could not be amended, 14 respondents said no; and 15 respondents either chose not to respond or neither agreed or disagreed to the question.

Not all respondents provided supporting comments to this question. For those that had provided comments, some of the common themes in response are listed below:

- In general, models 1 and 2 would appear to provide the level of funding required by EWC to operate effectively. However, the continued need for the Welsh Government to “subsidise” EWC fees, directly or indirectly, seems inconsistent with concept of having a modern Workforce Council.
- If the sum cannot be taken as desired in model 1 then the duties and administration of the organisation should be cut to reflect the reduced income.
- 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).
- It is agreed with the proviso that Part time employees should pay a proportional fee.
- No response provided to this question as the reference to the existing allowance for teachers in maintained schools in Wales has now been removed from the STPCD 2016.
- The NASUWT does not accept that Model 2 is a fair and appropriate model as it merely seeks to claw back the allowance from teachers by raising the fee they will be required to pay.
- We agree in principle, however, we believe that it is important that the EWC clarifies the benefits of registration for practitioners.
- We think this is an appropriate option, but only if necessary.
- Model 1 is the preferred option and should be pursued.

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?

Consultation response

We received 49 responses to this question, 19 respondents agreed, 22 respondents disagreed and 8 respondents either chose not to respond or neither agreed or disagreed to the question.

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.

Consultation response

The majority of respondents did not express a preferred option to which scale level the fee should be based if fee model 3 was used. Of those that did express an option; four respondents indicated scale 1, five respondents indicated scale 2, five respondents indicated scale 3, one respondent indicated scale 4 and two respondents indicated scale 7. Interestingly not one respondent liked scales 5 and 6.

Some of the common themes raised by respondents are listed below:

- If the sum cannot be taken as desired in model 1 then the duties and administration of the organisation should be cut to reflect the reduced income.
- Scale 4 seems a fairer percentage increase for school teachers compared with support/youth workers.
- Scale 2 because it is not too much of a jump from what the current level is.
- If a professional body is needed (They do not need one in England) then access and fees should be equal for all.
- Scale option 1 represents the fairest option for LSW as pay levels are low for these types of workers.
- Scale 3 appears to be the most reasonable option for both school teachers and school learning support workers. Both groups will experience an increase in their registration fee, but the amounts proposed ensure that the increases are relatively fair.

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.

Consultation response

This final question was not designed to solicit a yes/no answer, but allowed respondents to record their general thoughts and comments. We received 49 responses, of which 35 respondents provided comments. Those comments covered a range of issues, and there were some recurring themes raised here and throughout the consultation. Respondents raised the arguments about fees being based on actual salaries, that the cost of the fee should be paid by the employer or government; and that the EWC still had work to do to gain the respect and confidence of the education workforce.

Some of the common comments raised by respondents are listed below:

- 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.
- As the fee is taken from payslips as a forced charge, would a monthly fee not be more reasonable as this would stop the penalty those who enter the teaching and allied professions within a tax year pay. At this time when teachers are becoming scarce can this additional barrier be justified?
- 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.
- 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.
- 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?
- 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.

Government response

The Welsh Government was pleased to see that the majority of respondents to this consultation supported and agreed to the implementation of fee model one.

In both the 2014 and 2016 'Registration fees for the education workforce in Wales' consultations the Welsh Government made clear that their preferred fee model was fee model one; which saw an amendment to the STPCD and the redistribution of the £33 allowance teachers working in maintain schools in Wales received.

In response to the 2014 consultation; and in considering all responses made, the Welsh Government gave a commitment to continue discussions with the Secretary of State (SoS) for Wales and the School Teachers' Review Body (STRB) on the necessary amendment to the STPCD to implement fee model one.

In August, the STRB approved the amendment to the STPCD and subsequently removed section 28 and the school teacher's £33 allowance. Following this approval, the Cabinet Secretary for Finance and Local Government and the Cabinet Secretary for Education approved the transfer of £1million, with effect from 2017-18, from the Revenue Support Grant to support the registration subsidy for all practitioners. The Welsh Government noticed, while carefully considering each response to this consultation, that a recurring theme was raised relating to registration fees being set in accordance to practitioner's earnings/salaries and the need to take account whether practitioners are working full or part time.

Creating a fee model with differentiated fees based on salary scales was considered in the development of the 2014 Act. The Welsh Government has considered this again following responses received to this consultation. However, on further analysis, this kind of model proves to be extremely complex and would be an administrative burden to both the Council and employers to manage; thus resulting in an increase in registration fees for all practitioners to cover the additional administrative costs.

With this in mind, and following decisions by the Secretary of State, the STRB and the Cabinet Secretary for Finance and Local Government; the Welsh Government will draft new regulations and laid these before the National Assembly for Wales for approval. All practitioners will now see the benefit of the £1million subsidy, particularly those practitioners registering in the lower paid categories.