



Number: WG44232

Welsh Government
Consultation Document

New registration categories for the Education Workforce Council

Proposals to add to the categories of those required to register with the
Education Workforce Council

Date of issue: 1 March 2022

Action required: Responses by 24 May 2022

Overview

This consultation seeks to describe some inconsistencies in the current registration requirements of those working with our young people and invites your opinion on how we can address them.

How to respond

Responses to this consultation should be emailed/posted to the address below to arrive by **24 May 2022** at the latest.

You can respond to the consultation either by completing the online form or by downloading a copy of the questionnaire and emailing or posting it to us.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

[Education Workforce Council](#)

[The Independent School Standards \(Wales\) Regulations 2003](#)

[The Independent Schools \(Provision of Information\) \(Wales\) Regulations 2003](#)

[Education \(Wales\) Act 2014](#)

[The Education Workforce Council \(Registration of Youth Workers, Youth Support Workers and Work Based Learning Practitioners\) Order 2016](#)

[Additional Learning Needs and Education Tribunal \(Wales\) Act 2018](#)

The consultation documents can be accessed from the Welsh Government's website at gov.wales/consultations

Contact details

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This document is also available in Welsh: <https://llyw.cymru/categoriaw-cofrestru-newydd-ar-gyfer-cyngor-y-gweithlu-addysg>



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UK General Data Protection Regulation (UK GDPR)

The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations. Where the Welsh Government undertakes further analysis of consultation responses then this work may be commissioned to be carried out by an accredited third party (e.g. a research organisation or a consultancy company). Any such work will only be undertaken under contract. Welsh Government's standard terms and conditions for such contracts set out strict requirements for the processing and safekeeping of personal data.

In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing. You should also be aware of our responsibilities under Freedom of Information legislation.

If your details are published as part of the consultation response then these published reports will be retained indefinitely. Any of your data held otherwise by Welsh Government will be kept for no more than three years.

Your rights

Under the data protection legislation, you have the right:

- to be informed of the personal data held about you and to access it
- to require us to rectify inaccuracies in that data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection.

For further details about the information the Welsh Government holds and its use, or if you want to exercise your rights under the UK GDPR, please see contact details below:

Data Protection Officer:
Welsh Government
Cathays Park
CARDIFF
CF10 3NQ
e-mail:
Data.ProtectionOfficer@gov.wales

The contact details for the Information Commissioner's Office are:
Wycliffe House
Water Lane
Wilmslow
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0303 123 1113
Website: <https://ico.org.uk/>

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Summary of the main issues

1. Those working in education and youth work are at the core of helping learners fulfil their potential as valued members of society. The Welsh Government seeks to positively reinforce the professionalism of this vital workforce. This consultation seeks to describe some inconsistencies in the current regulation requirements of those working with our young people and invites your opinion on how we can rectify them.
2. The Minister for Education and Welsh Language has proposed these inconsistencies are addressed through new regulations. Your thoughts on these changes can help ensure all learners benefit from the additional safeguards of professional regulation. In addition, should our proposals be introduced, our learning and teaching staff will have parity, regardless of where they work.
3. It is our plan to introduce these new regulations in spring 2023, with a phased introduction of the new categories of registrations by September 2023. These proposals support the work to review the current arrangements for regulating independent schools in Wales. The review seeks to identify the necessary changes to the relevant independent school regulations to reflect current Welsh Government policy. The changes will ensure they safeguard and protect the wellbeing of learners in independent schools. We plan to bring these changes into force in 2023.
4. The consultation response form allows you to give us your opinions and thoughts. You are welcome to comment on all or some of our proposals.

How does registration currently work?

5. Registration is a licence to practise a particular profession. The range of regulated professions in the UK is extensive and growing. Examples include the legal profession, the health and social care sectors, accountancy, engineering and architecture.
6. Registration means the public can be reassured 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. Those working within a profession demonstrate a commitment to maintaining and raising standards, in the interests of the public.
7. Professional standards within the education workforce in Wales are regulated by the Education Workforce Council (EWC). People working in the following categories are required by law to register:
 - School teachers in maintained schools
 - Learning support workers in maintained schools
 - Further education teachers
 - Further education learning support workers

- Work based learning practitioners
 - Qualified youth workers
 - Qualified youth support workers.
8. The register is available to the public via the [EWC's website](#). Currently, the EWC has approximately 80,000 registrants.
 9. The EWC must investigate when it is alleged a registered person is guilty of unacceptable professional conduct, serious professional incompetence or has been convicted of a [relevant offence](#). An investigation can lead to a disciplinary order, which can in the most serious cases, result in removal from the register.
 10. The responsibility for ensuring only registered practitioners are employed to undertake the work specific to their category of registration lies with the employer or agency, as well as the practitioners themselves.

What do we want to change?

11. There are gaps in the current registration requirements which mean the level of professional regulation differs across the education workforce, even when individuals are carrying out the same or very similar roles. For example, a teacher working at a maintained school must register with the EWC, whereas a teacher doing a virtually identical job at an independent school does not. We want to add some staff working within independent schools to the list of those required to register with the EWC. In addition, we would like to update the categories of youth workers and youth support workers who are required to register with the EWC and those in the post-16 education sector.
12. We want to understand your views on whether there should be a requirement for staff, in addition to those identified, to be registered. For example, volunteers and those who deliver activity based services, such as rock climbing.
13. In making these proposed changes, there is no intention to limit the freedom to organise and deliver education. In adding these categories to the requirements to register we aim to:
 - Strengthen the safeguarding measures in place to protect learners and staff
 - Provide parity for those working in similar roles
 - Ensure a level of professionalism across all parts of education sector
 - Set expected behaviours across the sectors
 - Provide staff across the education sector access to a range of training and development tools provided through the EWC
 - Provide a route for individuals or organisations to raise concerns and have those concerns investigated independently.

Why we want some staff working at independent schools to register with the EWC

14. All independent schools in Wales are required to register with the Welsh Government. As a condition of registration and of remaining registered, they must comply with the arrangements for regulating independent schools in Wales including [the requirements set out in the Independent School Standards \(Wales\) Regulations 2003](#) ('the Standards'). *Keeping Learners Safe*, the Welsh Government's statutory guidance on safeguarding in education, also applies to independent schools. Independent schools are inspected by Estyn to ensure their compliance with the Standards. Independent special schools are inspected annually. Care Inspectorate Wales (CIW) inspect independent boarding schools against the National Minimum Standards for Boarding Schools and independent residential special schools against the National Minimum Standards for Residential Special Schools.
15. If a school fails to meet one or more of the Standards and it is considered there is a risk of serious harm to the welfare of the learners the Welsh Ministers may order a school be removed from the register of independent schools. This is subject to a 28 day right of appeal.
16. An inspection may identify a school has failed to meet one or more of the Standards, but does not consider there is a risk of serious harm to the welfare of the learners. In these circumstances the school is required to submit an action plan to the Welsh Ministers. This will outline how it intends to address the identified shortcomings. The Welsh Ministers have the powers to take further action if the school does not comply with the required steps. This could include closing down part of the school or stopping the admission of new learners. Ultimately, a school could be removed from the register for failing to meet one of more of the Standards.
17. However, the Welsh Ministers have no powers to direct an independent school to dismiss or remove a member of staff from their post. Only the proprietor, Board of Trustees or Council of Management of an independent school can do this.
18. The EWC has the powers to investigate allegations that a registered person is guilty of professional misconduct, serious professional incompetence or has been convicted of a relevant criminal offence. To bring some parity with the requirement for some staff in maintained schools to register with the EWC, we propose some staff in independent schools be required to register with the EWC.
19. The Children's Commissioner has recommended widening the scope of registration to staff at independent schools. In 2020 the Commissioner undertook a [review](#) of the exercise of functions of the Welsh Government under Section 72B Care Standards Act 2000. This was focused on home education and independent schools. The review recommended *'the Government's aim must be to substantially update the regulatory position in respect of independent schools, and to ensure that teachers are registered with the Education Workforce Council.'*
20. The Welsh Government has [accepted](#) the Commissioner's recommendation and recognised *'the importance of updating the regulatory position in respect of independent schools to ensure that staff are registered with the Education Workforce Council.'*
21. We do not think the type of school should determine whether a person is required to register with the EWC. Some staff working at independent schools currently register

with the EWC on a voluntary basis. Those who hold qualified teacher status (QTS) register in the school teachers' category. Those who do not hold QTS (whether or not they work as a teacher or in a support role) register as learning support workers. This is an imperfect solution. The description of 'school teacher' does not include those teaching at independent schools, but in the absence of an alternative, this has been an interim solution. Likewise, it is not ideal that those working as teachers register as learning support workers where they do not hold QTS.

22. We are proposing the creation of a new category of registration for teaching staff at independent schools. This is in recognition of the similarity between the roles and responsibilities of teaching staff at independent schools and those at maintained schools. It is proposed not to require QTS as we acknowledge not all independent schools require their teaching staff to hold QTS. However, we would expect teaching staff to be responsible for the following 'specified work' as set out in [regulation 7 of The Education Workforce Council \(Main Functions\) \(Wales\) Regulations 2015](#):

- planning and preparing lessons and courses for learners
- delivering lessons to learners
- assessing the development, progress and attainment of learners
- reporting on the development, progress and attainment of learners.

23. We expect this category will include the following groups of staff at independent schools who may or may not hold QTS recognised in Wales:

- Full-time teaching staff
- Part-time teaching staff
- Those responsible for leading the learning at the school, for example head teacher or proprietor
- Supply staff – procured through an agency or otherwise
- Peripatetic teaching staff – for example music and sports teachers
- Advisory teaching staff who spend a proportion of their time in a teaching capacity, involving direct unsupervised pupil contact
- Home tutors who are employed by an independent school to teach learners unable to attend school on a regular basis
- Any other staff who may have more than one role within a school, one of which includes teaching, for example houseparent, careers advisor, tutors.

24. We also propose learning support workers at independent schools be required to register with the EWC if they support teachers to:

- plan and prepare lessons and courses of study for learners
- deliver lessons to learners (including through distance learning and virtual techniques)
- assess the development, progress and attainment of learners
- report on the development, progress and attainment of learners.

25. We think the current learning support workers category is sufficiently broad to include staff with similar roles and responsibilities within the independent sector including:

- Teaching assistant
- Classroom assistant
- Learning support assistant
- Higher level teaching assistant (HLTA)
- Special/additional needs assistant
- Bilingual support assistant
- Pastoral/welfare assistant
- Support assistant
- Tutors (residential and non-residential)
- Early years assistants
- Instructors
- Cover supervisor
- Technicians
- Learning coaches.

26. In addition, there are other groups of staff who may have regular and unsupervised access to learners and young people. This can be during weekdays, in the evenings or at weekends. These staff may include house parents, matrons, boarding assistants, and staff who organise evening and weekend activities outside of normal studies. Often they provide welfare and pastoral support to learners outside the formal school day.
27. They may also live in close proximity to the learners, for example at boarding schools. Some may also be required to register with another regulator, for example residential child care workers are registered with Social Care Wales. However, there will be some staff who fall outside the scope of any regulator.
28. We would like to know whether you think staff who have regular access to learners and young people, but do not fall into the current or proposed categories, should be required to register with the EWC. If so, which categories of staff?
29. We intend to avoid the need for dual registration of any professionals. For example, staff employed at independent schools as registered nurses or occupational therapists would not need to register with the EWC unless they are undertaking a teaching or learning support role. If a person is in such a role they would need to register with the EWC, regardless of whether they are already registered with another professional body.

Why we want to change some of the requirements for youth workers and youth support workers to register with the EWC

30. The Education (Wales) Act 2014 ('the 2014 Act') and the Education Workforce Council (Registration of Youth Workers, Youth Support Workers and Work Based Learning Practitioners) Order 2016 ('the 2016 Order') outlines when youth workers and youth support workers must register with the EWC. Youth workers and youth support workers currently do not need to register with the EWC where they:
- Are not working in a paid capacity (whether for a '[relevant body](#)' or otherwise)

- Are not qualified, which include those currently studying for a qualification specified in the 2016 Order
- Work in a paid capacity in a setting which is not a 'relevant body', for example, in a housing/mental health/health/faith based organisation.

31. This means there are people who are being paid to work as either a youth support worker or youth worker who are actively working with young people who are not required to register. We believe this poses a potential safeguarding risk for young people and this consultation seeks to address these gaps.
32. The Interim Youth Work Board's [report](#) recommended '*Welsh Government should strengthen the current Education Workforce Council (EWC) legislation so that the gaps in registration criteria are closed*'. The Board believes implementing this recommendation will address '*a fundamental safeguarding issue arising in relation to youth work services, thus ensuring that all youth work in Wales takes place in safe and secure environments*' and will '*help to improve standards within the youth work sector by ensuring that all youth workers are registered and qualified to work with young people.*'
33. The views of the Board are similar to those expressed by some stakeholders in responding to the [previous consultation](#) ahead of registration being brought in. These are that regulation can help drive up the quality of youth work provision and help raise awareness of the impact of youth worker interventions, as well as creating parity across the education workforce.
34. We believe there are gaps in registration which could impact on the safety and wellbeing of young people. We have identified the following gaps:
- People in paid employment who are working towards a youth work qualification at level 2 and above
 - Paid youth workers and youth support workers who work in settings which are not relevant bodies such as housing, faith based organisations, private organisations, those working in emergency services such as the police and fire services and others. Unfortunately, we are not able to quantify the number of people this may include or the full range of settings they work in
 - Paid staff who are delivering youth work services and work with young people but who are not qualified. This could include people who have worked in a setting for some time and worked their way to their current role, but have not undertaken any youth work specific qualifications
 - Paid staff who are working towards a qualification but have not yet achieved it but deliver youth work services as either a youth worker, or a youth support worker.
 - Students who are not in paid employment but will, as part of their training, deliver youth work services to young people.
35. We would appreciate your views to help us consider how to strengthen registration to improve safeguarding for young people accessing services. Currently, only qualified youth workers or youth support workers who have a qualification specifically listed on Part 1 of Schedule 1, or Part 1 of Schedule 2 to the 2016 Order are able to register with the EWC. If the title of a qualification changes, or a new qualification is developed, this can impact whether individuals can register with the EWC, as the exact

qualification received no longer matches those listed in the Schedules. The list of qualifications in the 2016 Order rapidly becomes out of date.

36. Amendments to orders take time and it is unlikely changes could be undertaken fast enough to keep up with changes to approved qualifications. This lack of flexibility means there will be an impact for people who have undertaken qualifications which have not been added to the list. Similarly, where the name of the qualification has changed and is therefore not recognised by the EWC. This means we could have unregistered youth workers working with young people in Wales. Whilst the employer should have carried out Disclosure and Barring Service (DBS) checks, safeguarding could remain an issue. For example, a person could rely on their 'employed' status to gain alternative employment rather than having been subject to fitness to practice boards and there may also be issues not covered by DBS checks. It could also impact on the ability of qualified staff to apply for jobs, as they are not able to register.
37. Additionally, we are aware there is a small number of people who have previously registered with a Level 2 Certificate which was contained in the qualification list; however, this does not qualify them to be youth support workers as a full Level 2 Award is needed. The qualification list needs to be updated to better reflect this difference.
38. We are also aware that the description of a youth worker and a youth support worker in the 2016 Order are alike. This may cause confusion at registration because the category is based on qualification level rather than role. The Welsh Government has, in its Programme for Government, committed to future legislation changes in this area. This is in response to the recommendation of the Interim Youth Work Board to strengthen the legislative basis for youth work. Whilst further consideration of the roles of youth workers and youth support workers may be part of future legislative changes, we feel we can add clarity to the qualification requirement for each role in line with the this statement:

'A qualified youth support worker could be expected to have a level 2 or 3 qualification in Youth Work Practice or agreed historical equivalent. A professional youth worker could be expected to be qualified to at least degree level 6, or agreed historical equivalent, in a course that has been recognised and endorsed by Education Training Standards Wales or the UK and Ireland relevant bodies.'
39. Our proposal is to remove the list of specific qualifications from the 2016 Order, update and hold it elsewhere so it can be easily accessed by all, and to regularly update. An updated list of what we believe are the current qualifications is at Annex A. We would appreciate your views on removing the list of qualifications from the 2016 Order, and on the appropriateness of the revised list in Annex A.
40. We are also considering future work on registration of volunteers within the youth work sector, and this links to the 'Volunteers' section below. We know from previous consultations and other work over the past few years there are differing views on the need to register volunteers within this sector. There is currently no process which requires all volunteers to register with a regulatory body.

41. If this is something which is considered vital for youth services, we would like to understand how you think we should take this forward. For example, should there be a separate, informal, non-regulated register of volunteers? This could encourage individuals and/or organisations to indicate they use Youth Work Principles and Practices and ensure their volunteers are appropriately vetted, for example via DBS checks. This is something that could be explored further by the Youth Work Implementation Board which is currently being recruited.

Why we want to change the requirements for staff working in post-16 education to register with the EWC

42. The Education (Wales) Act 2014 and the Education Workforce Council (Main Functions) (Wales) Regulations 2015 as amended, set out the requirements for practitioners to register in the category or categories of registration for the work they undertake.
43. Currently included in these regulations are the following:
- Persons delivering learning for or on behalf of a further education (FE) institution, including those who deliver community based adult learning
 - Support workers delivering learning for or on behalf of a FE institution
 - Persons delivering learning or skills training for or on behalf of a [Work Based Learning \(WBL\) provider](#) contracted to the Welsh Government (this also applies to all sub-contractors and consortium members delivering training funded by the Welsh Government).
44. As part of the proposed amendments to the current legislation, we recommend addressing the following groups who are not required to register with the EWC:
- Persons delivering community based adult learning on behalf of a local authority
 - Practitioners at specialist FE establishments (known as Independent Special Post-16 Institutions (ISPIs) under the Additional Learning Needs and Education Tribunal Act 2018 (ALNET Act 2018))
 - Sector leaders who do not directly deliver teaching
 - WBL practitioners who are not funded directly by the Welsh Government to deliver apprenticeship programmes
 - Persons who only deliver higher education courses within a FE Institution.
45. Practitioners providing community based adult learning for or on behalf of a local authority are not currently required to register. There is no practical difference between the types of work carried out by these practitioners. Whether a person is delivering learning on behalf of an FE institution, on behalf of a local authority or through an independent specialist FE institution, the type of interaction with potentially vulnerable people is broadly similar.
46. This is why we are recommending all community based adult learning providers, employed through local authorities should be required to register with the EWC.
47. Headteachers at maintained schools are required to register with the EWC even if they have no teaching commitment at the school. Currently, leaders in FE and work based learning who do not undertake the respective services as set out in legislation for each sector do not need to register.

48. We believe we should have a consistent approach across our providers and recommend all leaders should be required to register with the EWC regardless of whether they undertake any direct teaching.
49. The current legislation includes an exemption which means staff who deliver higher education courses in FE institutions do not have to register. However, since 2016 all teaching staff working in FE institutions are employed on the basis of a common contract. This requires them to register with the EWC as FE teaching staff. Any staff, even those only delivering HE courses, are required to register. Therefore, we recommend removing the exemption from the legislation.
50. Currently, WBL practitioners who are not funded directly by the Welsh Government to deliver apprenticeship programmes are not able to register with the EWC. This means any WBL practitioner employed through some form of publicly funded programme, for example by the Welsh Government or local authorities, may not be registered. As a result, these practitioners do not have access to the benefits provided through registration to a professional body, and employers and learners do not have the safeguarding assurances the EWC provides.
51. We recommend all WBL practitioners delivering provision funded through a public body should be registered with the EWC.
52. Our intention is to extend the requirements to register with the EWC to include practitioners at specialist FE establishments, also known as ISPIs under the ALNET Act 2018. This would only be for those establishments based in Wales.
53. The ALNET Act 2018 makes provision for a new statutory framework for supporting children and young people with additional learning needs (ALN). It will replace existing legislation surrounding special educational needs (SEN) and the assessment of children and young people with learning difficulties and/or disabilities (LDD) in post-16 education and training.
54. Amongst other things, the 2018 Act requires the Welsh Ministers to establish, maintain and publish a list of ISPIs in Wales and England (the list). The Welsh Ministers may only include an institution in the list on application by its proprietor.
55. An ISPI is an institution which provides education or training for persons over compulsory school age and is specially organised to provide such education or training for persons with additional learning needs. But further education institutions, independent schools (included in the register for Wales), independent educational institutions (included in the register for England) and 16-19 Academies are not ISPIs.
56. Section 56 of the ALNET Act 2018 Act requires the Welsh Ministers to make regulations providing for:
 - The content of the published list
 - Requirements to be complied with as a condition of being included on the list

- Requirements to be complied with while the institution is listed (including requirements for approval by the Welsh Ministers of arrangements at the institution and change of such arrangements)
- Removal of the institution from the list
- Rights of appeal to the First-tier Tribunal for proprietors of institutions against decisions
 - (i) To refuse to list an institution
 - (ii) To remove an institution from the list
 - (iii) Not to approve or not to approve a change arrangements at the institution.

The Additional Learning Needs (List of Independent Special Post-16 Institutions) (Wales) Regulations 2020 have been made under this section.

57. Currently, teaching staff and teaching support staff at ISPIs are not required to register with the EWC. In the report on Independent Schools, the Children’s Commissioner did not specifically mention ISPIs when making the recommendation to widen the scope of EWC. However, we consider that these staff at all ISPIs in Wales should be required to register, regardless of whether the ISPI is included in the list. As with the case made previously in this document, we believe all persons working in post–16 should be required to register regardless of the type of institution to bring some parity to the professions.

Volunteers

58. Volunteers provide a valuable and vital service supporting our learners and young people. Without them many services would not be able to operate. We want to ensure we do not disrupt this or do anything to prevent this essential and important work.
59. We do not think it is reasonable or appropriate to require volunteers to register with the EWC. Requiring volunteers in the education sector to register with the EWC would place them in a different position from volunteers across other sectors. This would be a barrier to being able to attract informal and short term support.
60. Recent mapping work, for example in the youth work sector, has indicated high levels of volunteers across the sector. Volunteers may be helping on a casual or ad–hoc basis or for very few hours per week/month. They can also be under the age of 18. We have concerns about the proportionality and reasonableness of requiring volunteers to register.
61. One of the reasons for requiring registration is to ensure standards of professionalism are met. Such professional standards cannot be required from volunteers as they do not have the same level of training and qualification requirements to undertake their role. Also attendance is optional rather than mandated by employment contracts.
62. As part of regulated registration there is an ability to impose a range of sanctions on registered persons, including their removal from the register. However, with volunteers this would not prevent them undertaking volunteering work across other sectors. Many organisations carefully manage and supervise interactions between volunteers and the learners and young people they work with. Additionally, there are official means of dealing with inappropriate behaviour by volunteers, for example vetting by the DBS or criminal proceedings.

The other issues we need to consider

63. Registration with the EWC comes with an annual fee for all registrants. This is set out in [regulations](#) at £46 per registrant. The Welsh Government subsidises the fee for registrants via a payment direct to the EWC. The fee payable by registrants is £45 or £15 dependent on the category of registration. Further information about the current fees is available on the [EWC's website](#).
64. At this stage, we are not consulting on the level of fees to be paid. When we have further developed our thinking and agreed the changes to the requirements for registration, we will seek your views on the appropriate fee.
65. We are mindful of the need to consider the operational practicality for the EWC if thousands of people in Wales become subject to registration and regulation. In the past, new groups have been added in a phased way to ensure they are registered in time to enable them to operate in their roles.

What will be different if the new arrangements are put in place?

66. If these proposals are accepted, there will be strengthened safeguarding of our learners and young people, together with equality of professionalism.
67. In addition to the current groups of registrants, the following categories would be required to register with the EWC:
 - Teaching staff and learning support workers at independent schools
 - Paid youth workers and youth support workers who are not qualified or who work in a setting which is not a 'relevant body'
 - Those working in specialist FE institutions, also known as ISPIs
 - Practitioners providing community based adult learning for or on behalf of a local authority
 - Those who only deliver higher education courses at FE institutions
 - Publicly funded WBL providers who are not funded directly by the Welsh Government to deliver apprenticeship programmes
 - Principals and senior leaders (including Chief Executive Officers) in non-teaching roles in post-16 institutions and work based learning practitioners.

Please tell us what you think

68. Thank you for taking the time to read this document. Please feel free to make any comment you wish on this document. However, we would particularly welcome comments on any or all of the questions within the consultation response form. If you would like to add more, please make use of the space available in the form to let us know more.