

# Registration fees for the education workforce in Wales (2017)

## Consultation response form

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Responses should be returned by **30 September 2016** to:

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Welsh Government  
Cathays Park  
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or completed electronically and sent to:

e-mail: [ewc.enquiries@wales.gsi.gov.uk](mailto:ewc.enquiries@wales.gsi.gov.uk)

## 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 STPCD<sup>1</sup>, 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.

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

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.<sup>2</sup> Of the members who responded, 47% were teachers, 18% FE lecturers and 14% 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.”**

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

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](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?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input checked="" type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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**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?

<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input checked="" type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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**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?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input checked="" type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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**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.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: