



WALES

RESPONSE TO:

Registration fees for the education workforce in Wales

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The University and College Union (UCU Wales) represents more than 7,000 academics, lecturers, trainers, instructors, researchers, managers, administrators, computer staff, librarians, and postgraduates in universities, colleges, adult education and training organisations across Wales.

UCU Wales is a politically autonomous but integral part of UCU, the largest post-school union in the world: a force for educators and education that employers and government cannot ignore.

UCU was formed on the 1st June 2006 by the amalgamation of two strong partners – the Association of University Teachers (AUT) and the National Association of Teachers in Further and Higher Education (NATFHE) – who shared a long history of defending and advancing educators’ employment and professional interests.

We welcome the opportunity to respond to the consultation on registration fees for the education workforce in Wales.

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

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

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 – Should the Welsh Government seek an amendment to the *School Teachers' Pay and Conditions Document (STPCD)* to remove the reference to the existing subsidy for teachers in maintained schools, in order for the subsidy to be redistributed across the whole workforce, reducing the fee for **all** registrants from 2016, as suggested under model 1?

Supporting comments

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.

Neither do we agree that there should be set fees that are based solely on registration categories.

However, in the event that the costs are to be met by individual registrants, it is agreed that in the first instance the Welsh Government seek an amendment to the STPCD to remove the reference to the existing subsidy for teachers in maintained schools, in order for the subsidy to be redistributed across the whole workforce.

If registrants are expected to pay fees, then whatever subsidy there is available should be redistributed across the entire workforce. It would be wholly inappropriate, in a body that seeks to promote professionalism across the sector, that one category should be favoured over another.

Question 3 – If the *STPCD* **cannot** be amended; or if you believe that the *STPCD* should **not** 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?

Supporting comments

Our members are very clear that it should not be the individual registrants that foot the bill, as they are not convinced of the benefits of the Education Workforce Council as it stands, to them as professionals.

We understand the principles behind model 2, but do not agree that a flat rate should be applied, however should the outlined proposals go ahead and if the STPCD cannot be amended, then it would be appropriate that any fee subsidies applied should result in equitable levels of contribution.

Question 4a – 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 4 of the table, as highlighted on pages 12–13 of the consultation?

Agree	<input type="checkbox"/>	Disagree	x	Neither agree nor disagree	<input type="checkbox"/>
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Question 4b – If you disagree with the use of scale 4 in model 3, please indicate which scale would be more preferable by ticking the relevant box in the table below:

Fee Scale	School and FE Teachers	School and FE Learning Support Workers	
1	£71	£15	<input type="checkbox"/>
2	£68	£20	<input type="checkbox"/>
3	£65	£25	<input type="checkbox"/>
4	£62	£30	<input type="checkbox"/>
5	£58	£35	<input type="checkbox"/>
6	£55	£40	<input type="checkbox"/>
7	£52	£45	<input type="checkbox"/>
8	£49	£49	<input type="checkbox"/>

Supporting comments

If it is necessary that fees are payable by individuals, we would prefer to see a system that bases fee levels on the individual's ability to pay, rather than an 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. It does not seem just, that part time

hourly paid teachers or lecturers should pay twice as much as full time LSA's, who could quite possibly be earning considerably more (option 4) or to pay almost 5 times as much (option 1), nor would it be just that full time LSA's, who earn considerably less than a full time teacher or lecturer at the top of the pay scale, should have to pay the same (option 8).

We would like more detail as to how and who will collect fees for part time hourly paid staff, who work in more than one institution. We have concerns that initial teething problems in the system might result in some part time hourly paid staff being further disadvantaged, by being charged more than once.

Question 5 – Given the option, which fee model would you prefer?

Supporting comments

We would like to see the EWC funded by the Welsh Government or the employers, as it is felt that currently there is very little that the body has to offer lecturers, in terms of supporting and promoting their professional development or status.

However, if it is decided that our members should bear the responsibility for funding the EWC, our preferred model would be a sliding scale based on ability to pay.

Our fundamental problem with the notion that the cost of running the EWC should be the responsibility of its members, is that currently the proposed body does not appear to offer any benefit to those compelled to register.

In terms of truly making an impact on improving the quality of teaching and learning, the proposed model seems to have little to offer either its members or the general public. It appears that the result will be a very costly mechanism for holding a register lecturers and for weeding out a minority who are considered 'unfit' to practice. This seems to be a rather negative role for a body that could potentially provide very positive benefits, in terms of supporting the majority of conscientious, hardworking and dedicated lecturers who are fit to practice. The workforce needs to be supported and valued as professionals, rather than scrutinised and penalised.

However, we agree that the professional status of lecturers needs to be promoted and would gladly work in partnership towards achieving this goal;

but, we do not share the assumption that simply creating a register, will have the effect of improving professional standards.

We note with interest the time and effort that has been put into producing the Professional Learning Model for teachers in maintained schools. We recognise the value of the 'New Deal' and the principles of practitioner lead/evidenced based practice. However, we are alarmed that equivalent opportunities for FE lecturers are not receiving the same attention. This 'gap' will, in our opinion, totally undermine the principles of establishing the EWC for the inclusion of FE lecturers and FE LSA's. Our concern is that the result will be a two tier education workforce; one with access to CPD that is appropriate, available and influenced by practitioner need and one that is not. The unintended consequence of this may be the creation of a professional underclass for FE lecturers, which could potentially generate very negative and damaging public opinion of the quality and provision of further education. We see that the EWC could play a valuable role in bridging this gap.

We believe that to improve the standards of teaching and the quality of learning in Wales, teaching professionals at all levels need access to appropriate continuous professional development. We would expect that a body which has been set up to promote the raising of professional standards would, at a very minimum, support the appropriate continuous development of its members, in return for compulsory membership and fee contribution.

Question 6 – 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 are aware that the GTCW have highlighted in their Annual Report, the difficult financial position that they find themselves in and the lack of reserves available to assist in their transition to the EWC. We are very concerned by the suggestion that:

“...the Council recommends that the Minister should set the Council in its reconfigured form free of government constraints over its registration fee income.”

This is a clear indication that the GTCW/EWC is currently underfunded. Therefore we cannot support the suggestion that the Minister relinquishes

the right of veto over the setting of fee levels, as this will undoubtedly result in the unrestrained setting of fee levels for those required to register.

It is still the overwhelming feeling of our members that the formation of the Education Workforce Council does not benefit them as professionals in terms of offering support and professional development. The establishment of the EWC is regarded as primarily to promote the Welsh Government agenda and to safeguard the interests of the general public; although we are not convinced exactly how this will be achieved. Under these circumstances our members are of the opinion that they should not have to foot the bill and that the costs should be met by the Welsh Government or the employers.

Our members are aggrieved that they are being expected to fund a body that does not appear to represent their interests. The situation has been compounded further by the knowledge that they will have no option but to register, as their details will be supplied directly to the EWC by their employers and that further to this they will have no option but to pay a fee, as it will be deducted at source.

We are disappointed that the process of the setting up the EWC has not been used as an opportunity to seriously engage with practicing lecturers, to build a body that truly represents and supports teaching and learning professionals, in the bid to improve the quality of education in Wales. There is no doubt that lecturers would welcome the move to enhance their professional status and would have engaged wholeheartedly in professional dialogue. Sadly the process has been perceived as one of a fait accompli. We believe that for a EWC to gain the trust and confidence of the general public, it is a basic necessity that those required to register as members have trust and confidence in the remit of the EWC.

The issue of registration fees would likely be less contentious if our members felt a sense of ownership, empowerment and professional recognition.

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: