



**WALES
CYMRU**

**RESPONSE TO:
Registration fees for the education
workforce in Wales (2017)**

Contact Details:

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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. It 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 (2017)

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		Disagree	x	Neither agree nor disagree	
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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"/>
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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		Disagree	x	Neither agree nor disagree	
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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

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.

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: