

# Education Workforce Council

## ITE Accreditation Fees

## Consultation Report

## 1.0 Introduction

An order was laid before the National Assembly on the 15 February 2017 adding four additional powers to the Education Workforce Council's (EWC) existing statutory duties under the *Education (Wales) Act 2014*, namely:

- accrediting courses or programmes of initial school teacher education;
- monitoring compliance of accredited courses or programmes of initial teacher education with the accreditation criteria;
- withdrawing accreditation of courses or programmes of initial school teacher education;
- charging fees in connection with providing the service.

In carrying out these functions, EWC seeks to ensure that programmes of ITE are professionally appropriate, demanding and lead to student teachers meeting the Qualified Teacher Status (QTS) standards in Wales.

Regulations came into force on the 10 March 2017 setting out further detail of EWC's new role.

The *Education Workforce Council (Accreditation of Initial Teacher Training) (Additional Functions) Order 2017* allows the EWC to charge a fee to partnerships to assess its programme. The fees charged by the EWC may not exceed the cost of providing the service.

Partnerships submitting programmes of ITE which run from September 2019 have not been charged a fee as costs for the initial round of accreditations have been met by the Welsh Government, through grant funding to the EWC.

## 2.0 The consultation process

The consultation process was as follows:

- publication on the EWC's website where the following were made available:
  - consultation document;
  - a downloadable consultation response form;
  - an online consultation response form.
- an email advising stakeholders that the consultation had been published, which included the provision of the website link was sent to the following:
  - ITE Partnerships;
  - Regional Consortia;
  - Estyn;
  - Other GTCs.

- inclusion in the stakeholder newsletter that the consultation had been published, which included the provision of the website link.

Respondents were encouraged to provide a response using the online form or by downloading the questionnaire from the EWC's website and submitting it electronically.

The consultation period ran from 14 May 2018 to 6 July 2018.

### **3.0 Consultation responses – organisations and individuals**

A total of 6 responses to the consultation were received as follows:

- Yr Athrofa, University of Wales Trinity St David
- Ysgol Rhydywaun
- Estyn
- UCAC
- University of South Wales
- Aberystwyth ITE Partnership Group

### **4.0 Main findings**

The consultation questionnaire contained 4 questions and also invited additional comments.

The questions asked were:

Question 1 - Do you agree that the fees charged by EWC may not exceed the cost of providing the service?

Question 2 - The EWC is proposing to proceed on the basis of model 1. Do you agree this is the appropriate model?

Question 3 - In relation to your preferred model, do you agree with the timeframe for the payment or collection of the accreditation fees?

Question 4 - We would like to know your views on the effects the proposed fee model would have on the Welsh language, specifically on:

- i) opportunities for people to use the Welsh language; and
- ii) treating the Welsh language no less favourably than the English language.

Question 5 - Please provide any further comments you have on the proposals within this document.

## Reponses

### **Question 1**

- 4 respondents agreed with this question
- 2 respondent did not agree with this question

### **Question 2**

- 4 respondents agreed with this question
- 2 respondent did not agree with this question

### **Question 3**

- 5 respondents agreed with this question
- 1 respondent did not agree with this question

### **Question 4**

A number of additional comments were provided.

### **Question 5**

A number of additional comments were provided.

Full details of the responses are listed at Annex A.

**ANNEX A**

**CONSULTATION RESPONSES**

## Responses received

### Question 1:

*Do you agree that the fees charged by EWC may not exceed the cost of providing the service?*

Yes	4	66.7%
No	2	33.3%
Total	6	100%

Comments
<p>Fees should be on a cost recovery basis only and should not prevent ITE partnerships submitting programmes for accreditation, re-accreditation and modification.</p> <p>Further information is needed to clarify:</p> <ul style="list-style-type: none"><li>• The difference between new programmes and existing programmes as the fee per application is the same for both. A rationale for this would be useful.</li><li>• The definition and anticipated extent of 'major changes'. What constitutes a 'major change'? Does the definition take into consideration the university regulations for major modifications of programmes?</li></ul> <p>There is no reference to anticipated numbers on programmes as this might have an impact on the availability of funding to cover accreditation costs. This may be a disincentive for partnerships to seek accreditation for smaller courses that might respond to a particular need or shortage area.</p> <p>The fees for monitoring visits allow for a differentiated approach depending on the extent of monitoring required.</p>
<p>Fees need to be spread out over time. Model 1 could clearly exceed the cost of providing the service.</p>

### Question 2:

*The EWC is proposing to proceed on the basis of model 1. Do you agree this is the appropriate model?*

Yes	4	66.7%
No	2	33.3%
Total	6	100%

Comments
<p>This appears to be the fairest model and avoids unnecessary expenditure by ITE partnerships.</p>

It would be helpful if the EWC provides further information on what constitutes 'direct costs' for accreditation if staffing and overheads are not included in the accreditation fees. The document states that any preferred fee model should be at a sufficient level to ensure that the EWC has a sustainable level of funding. The adopted fee model should also be sustainable for partnerships and not prohibitive. A clearer break down of direct costs would help partnerships understand how the accreditation process provides value for money.

Cytunwn mai talu am y gwasanaethau y mae arnynt eu hangen yn unig yw'r ffordd orau o strwythuro'r ffioedd.

*I agree that paying for the services that they need is the best way of structuring the fees.*

There is an unknown factor to model 1. Monitoring visits could be set up on unclear grounds. We are in support for Model 2. There is a clearer indication of fixed costs and fairer to the number of programmes being reviewed/monitored.

**Question 3:**

***In relation to your preferred model, do you agree with the timeframe for the payment or collection of the accreditation fees?***

<b>Yes</b>	<b>5</b>	<b>83.3%</b>
<b>No</b>	<b>1</b>	<b>16.7%</b>
<b>Total</b>	<b>6</b>	<b>100%</b>

**Comments**

This seems a sensible and potentially efficient timeframe.

**Question 4:**

***We would like to know your views on the effects the proposed fee model would have on the Welsh language, specifically on:***

- i) opportunities for people to use the Welsh language; and***
- ii) treating the Welsh language no less favourably than the English language.***

**Comments**

We do not anticipate any detrimental effects on people's opportunities to use the Welsh language or on the position of equity between languages.

The fee tariff should not have a detrimental effect on the accreditation of Welsh language ITE provision. For instance, it might be that some Welsh language courses have relatively small numbers with more limited income from student fees.

Hyderwn fod pob agwedd o'r broses achredu yn gallu digwydd trwy gyfrwng y Gymraeg, gan gynnwys unrhyw ymweliadau monitro, a bod y posibilrwydd hynny'n cael ei hyrwyddo'n amlwg i'r sefydliadau/partneriaethau dan sylw (h.y. cynnig rhagweithiol).

*We trust that all aspects of the accreditation process can take place through the medium of Welsh, including any monitoring visits, and that possibility is clearly promoted to the organisations / partnerships (ie pro-active offers).*

The effects of the proposed fee models will be significant to partnerships, regardless of preferred language (Welsh or English)

N/A to our programme and no impact.

**Question 5:**

***Please provide any further comments you have on the proposals within this document.***

**Comments**

As noted previously, further information is required on what constitutes 'direct costs' as the accreditation of ITE programmes is a core function of the EWC.

The proposed fees as suggested in the three options provided are significant and, compared with those fees charged by other professional bodies with which HEIs work, are high. Whilst it is acknowledged that there needs to be a fee, this needs to be proportionate to the work and effort involved in and take account of the significant cost to partnerships of developing, validating and sustaining new programmes in accordance with the accreditation criteria.

Whilst the university disagrees with the fees as proposed, we would deem option one to be the least detrimental in financial terms.

Model 2 is more open, transparent and more collegiate.