

# **Consultation on proposed new Teaching Council fees for programme monitoring, review, audit, and special review services to Initial Teacher Education providers**

August 2024



**Teaching  
Council of  
Aotearoa  
New Zealand**

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## Purpose

We seek feedback from Initial Teacher Education (ITE) providers about proposed new fees for programme monitoring, reviews, audits, and special review services for English medium ITE programmes. This document describes how the Teaching Council of Aotearoa New Zealand has intended to ensure that any charges to ITE providers reflect the actual and reasonable costs of the services provided. It also provides background contextual information and outlines how these new fees relate to the Teaching Council's revised *ITE Programme Approval, Monitoring, Review, and Moderation Policy*.<sup>1</sup> This information is provided to assist ITE providers in submitting feedback on the proposed new charges.

## Background

1. The Teaching Council's legislated functions in relation to ITE include:
  - establishing and maintaining standards for qualifications that lead to teacher registration
  - reviewing those standards at any time and, after consultation with the Minister of Education, varying, deleting, replacing, adding, or substituting standards
  - conducting, in conjunction with quality assurance agencies, approvals of teacher education programmes.<sup>2</sup>
2. The Education and Training Act 2020 permits the Teaching Council to charge for the actual and reasonable costs incurred by the Teaching Council in performing its functions, including charging fees for any services provided.<sup>3</sup>
3. As you will be aware, ITE providers have directly contributed to the costs of external monitoring and reviews in the past, with a combination of reimbursements and direct contracts. The Teaching Council proposes establishing a fee structure that will enable consistency and efficiency for all parties in providing our functions and services.<sup>4</sup>
4. The Teaching Council's *ITE Programme Approval, Monitoring, Review, and Moderation Policy (2024)* states that the Teaching Council will publish a schedule of fees for the actual and reasonable costs associated with:
  - considering whether or not to approve a programme
  - considering major changes to an approved programme
  - programme monitoring
    - universal monitoring - level one
    - tailored monitoring - level two
    - investigative monitoring - level three
  - reviewing whether or not a programme should continue to be approved
  - undertaking special reviews (where appropriate)
  - audits (where appropriate).

The policy states that these charges 'must be met by the relevant applicant/provider, unless otherwise agreed with the Teaching Council'.<sup>5</sup>

The policy contains a number of new or revised policies in regard to Teaching Council functions that it undertakes for ITE programmes, including different levels of monitoring and a national moderation event or events. Understandably, these new or revised processes have not been operationalised yet.

<sup>1</sup> Teaching Council, *ITE Programme Approval, Monitoring, Review, and Moderation Policy*, Wellington: Teaching Council, 2024.

<sup>2</sup> Education and Training Act 2020, s479(1)(f).

<sup>3</sup> Education and Training Act 2020, ss480(5)(6).

<sup>4</sup> Apart from a small amount of funding provided by the Ministry of Education for specific leadership activities, and system support of Matatū's online system, Hapori Matatū.

<sup>5</sup> Teaching Council, *ITE Programme Approval, Monitoring, Review, and Moderation Policy*, p.27.


5. Since the introduction of the new ITE programme requirements in 2019, the Teaching Council has not recovered its costs related to interim monitoring.

## How we developed our proposed changes to the fee schedule

6. The Teaching Council developed the revised *ITE Programme Approval, Monitoring, Review, and Moderation Policy* in 2022–2023 through substantial consultation with ITE providers. ITE representatives, and representatives from various education sector organisations, also contributed through an ITE Advisory Group, and a Monitoring, Review, and Moderation (MRM) Working Group. As a result of this process, the proposed revised policy was amended to lessen the administrative burden on ITE providers for participating in monitoring, reviews, and moderation of ITE programmes.
7. Following the finalisation of the policy, the Teaching Council undertook an investigation into the likely costs of delivering these services. The fees proposed in this paper reflect our estimate of the actual and reasonable costs of providing services to ITE providers. They include payments to external experts (such as panel members, panel chairs, and external monitors) and Teaching Council expenses such as technology costs and staff time spent on preparation (such as desktop analysis) and follow-up (such as review panel report writing and invoicing). They were calculated on an assessment of the average current costs associated with servicing ITE programme approval and assessment panels, programme change applications, and emergency panels.
8. Proposed fees aim to accurately reflect the staff time involved in monitoring, reviews, and audits. For example, with review panels, the estimated costs for staff time are based on previous experience and include the costs associated with pre-panel liaison, desktop analysis, peer review of documentation, panel preparation, representation on the panel, and administration.

### The proposed new fees

Service type	Proposed new fees	Undertaken online or in person	Total proposed fees (\$) excluding GST
ITE programme monitoring (under <i>ITE Programme Approval, Monitoring, Review, and Moderation Policy</i> )	Universal monitoring (level one)	Online	\$360
	Tailored monitoring (level two)	Online	\$1,560
		In person	\$2,411
	Investigative monitoring (level three)	Online	\$3,060
In person		\$4,091	
ITE programme reviews (under <i>ITE Programme Approval, Monitoring, Review, and Moderation Policy</i> )	Desktop analysis by the Teaching Council	Online	\$860
	One day, two-member review panel	Online	\$6,420
		In person	\$9,824
	One day, three-member review panel	Online	\$7,700
		In person	\$11,955
One day, four-member review panel	Online	\$8,980	
		In person	\$12,384
ITE programme audits (under <i>ITE Programme Approval, Monitoring, Review, and Moderation Policy</i> )	To be discussed and negotiated with provider (please see paragraph 12 below)		
ITE programme special reviews (under <i>ITE Programme Approval, Monitoring, Review, and Moderation Policy</i> )	To be discussed and negotiated with provider (please see paragraph 14 below)		

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9. The occurrence of these fees varies, as outlined in the *ITE Programme Approval, Monitoring, Review, and Moderation Policy*:
- a) Monitoring: In the case of one, two, and three-year programmes, monitoring will be undertaken annually in the first three years of delivery. In the case of four-year programmes, monitoring will be performed annually in the first four years of delivery. Subject to satisfactory monitoring reports, thereafter the approved programme will be monitored every second year, unless that year coincides with a programme review.
  - b) Reviews: The date of first review is after four years for one or two-year programmes and after five years for three-year or longer programmes. Thereafter reviews are to be undertaken no later than five years from the previous review.
  - c) Audits: Are not scheduled. They may occur periodically to check compliance with ITE programme requirements. The Teaching Council will give a provider reasonable notice of any audit that it intends to undertake.
  - d) Special reviews: Are not scheduled. They may be undertaken where concerns about a programme or type of programme have surfaced. The Teaching Council will give a provider reasonable notice of any special review that it intends to undertake (please see following section for information about special reviews).
10. Appendix One outlines the proposed fees in greater detail, with breakdowns and explanations of costs.

## Audits

11. An audit is an inspection or examination of a programme's documented policies and procedures, candidate selection records, and student assessment information to verify regulatory compliance and/or consistency of assessment decisions. They would only occur after extensive engagement with an ITE provider.
12. Fees for audits of an ITE programme will be discussed and negotiated with the relevant ITE provider. As these fees will be negotiated, fixed fees are not detailed here. They will vary according to the outcome of negotiations between the provider and the Teaching Council, and the appropriate depth of auditing that the Teaching Council requires. Subject to negotiation and circumstance, they may involve fees for an external and independent auditor to conduct an in-person one-day visit to an ITE provider and to write a post-visit report, as well as fees for a desktop analysis by a Teaching Council staff member, and a minor fixed administrative fee. Fees for an audit of two or more programmes offered by one ITE provider will cost more than an audit of one programme.

## Special reviews

13. Special reviews would only occur if the Teaching Council has concerns about a programme or type of programme. It is important to note that a special review would only occur following extensive engagement with the provider involved. Special reviews will be an extremely rare event, as they are a last resort option. A variety of options will be considered if the Teaching Council decides a special review ought to occur. Options include:
  - a) An exploratory review which does not determine whether a programme continues to be approved, but instead collects further information about the programme. Exploratory reviews will vary according to the risks identified. They may include a review by an external panel or Teaching Council staff, asking a provider to seek peer support (internal or external), developing a remediation plan, or undertaking consultations with programme partners or student teachers. The type of information collected and whether a physical visit or external panel is required will differ according to the circumstances. Exploratory reviews are likely to

be relatively low cost, although an external panel will cost more.<sup>6</sup>

- b) If the exploratory review indicates a special review panel needs to be established to consider whether a programme continues to be approved, a special review panel will be formed. The size of special review panels, and the length they would sit, would differ according to the level of concern the Teaching Council has about a programme. Panels would be comprised of several external panel members to cover the expertise required and an external panel chair. They would be supported by a Teaching Council staff member. The panels could be held online or in person. They are likely to be relatively high in costs.

14. Fees for special reviews will be discussed and negotiated with the relevant ITE provider. As these fees will be negotiated, fixed fees are not detailed here. They will vary according to the outcome of negotiations and the appropriate level of special review that the Teaching Council requires. Costs will be based on the Teaching Council's fees schedule for ITE programme approval panels.<sup>7</sup> Fees are likely to be similar to those proposed for review panels in this document but will vary according to how many days a special review panel sits.

## What is excluded

15. This paper does not propose or discuss fees for some services it provides to ITE providers as follows:

- a) The fees for ITE programme approvals and considering major changes to an approved ITE programme remain unchanged (see Appendix Two for these fees).
- b) The costs of interim monitoring will continue to be met by the Teaching Council through fees and the levy it charges to teachers. Interim monitoring is planned to cease at the end of 2024 for all English medium programmes.
- c) There will be no fee for annual reporting. There are different purposes for the information required to be collected for annual reporting. The information that is easy to source is part of the monitoring the Teaching Council undertakes of ITE providers. The information collected for the purpose of periodic review provides the Teaching Council with a nationwide picture of the ITE sector as a whole.<sup>8</sup> It is thus for the benefit of the entire ITE sector rather than for benefit of individual programmes.
- d) Similarly, there will be no fee for national moderation event(s) because they will accrue general benefit to the whole sector, rather than to individual providers. Accordingly, the costs for the design, organisation, venue hire, and catering for the inaugural national moderation event to be held in late August 2024 will be absorbed by the Teaching Council (although travel and accommodation costs will need to be paid by providers). This is also the case for future national moderation events held biennially thereafter.
- e) There will be no fee for some of the Teaching Council's administrative tasks related to ITE monitoring, reviewing, auditing, and special reviewing because the benefits accrue to all ITE providers in general. This includes such tasks as recruiting panel members (for review and special review panels), developing documentation to support review and special review panels—such as guides and contracts—and liaison with the New Zealand Qualifications Authority.
- f) Some other ITE-related costs are also not charged for as the benefits either accrue to the Teaching Council, or to the wider education sector in general, such as producing newsletters, hosting symposia, and responding to queries.

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<sup>6</sup> For further information, see Teaching Council, *Initial Teacher Education monitoring, review, and moderation: Consultation on proposed changes to Part Two of the ITE Programme Approval, Monitoring and Review Requirements*, Wellington: Teaching Council, 30 August 2023, pp.12-13.

<sup>7</sup> See Teaching Council, 'Updated Teaching Council charges for ITE providers', Appendix One: Schedule of increased fees to apply from 1 April 2023, n.d., c. April 2023. For reference, this is also provided in Appendix Two of this document.

<sup>8</sup> Teaching Council, *ITE Programme Approval, Monitoring, Review, and Moderation Policy*, ss6.5.2a and 6.5.2b, p.19.



## Timing to introduce the new fee schedule

16. It is proposed that all new ITE fees outlined in this paper will be charged from 1 January 2025. The Teaching Council does not have any programme monitoring or reviews planned in 2024. Interim monitoring is still planned for three remaining ITE providers in 2024, but the Teaching Council will cover these costs itself, as it has for previous interim monitoring.
17. After this consultation, we would not expect to review these fees for the next three years. We will consult with the ITE provider sector again for any future review of fees.

## Seeking your feedback: what we'd like to hear from you

18. We want to hear your thoughts on the proposals in this paper. We do not want to constrain your feedback, but it may be useful for you to use the question prompts that follow:
  - Do you accept the rationale for the proposed fees? If not, why not?
  - Do you agree with the basis of the calculation of proposed new fees? If not, why not?
  - Do you have any suggestions for alternative ways of structuring or recovering our costs, or reducing our costs?
  - Will the special review fees potentially penalise those programmes and providers most at risk? If so, is that raising equity issues, and should some of the costs be shared by all providers?
  - Any other comments?

Please send your feedback by 5:00pm Tuesday 10 September 2024 to:  
[ITEconsultation@teachingcouncil.nz](mailto:ITEconsultation@teachingcouncil.nz)

## Next steps

19. We will collate your feedback and take it into account before making any final decisions on fees. That decision, once it is made, will be communicated to the sector together with information on when new fees will be charged. We will also share a summary of submissions from providers.



# Appendix One: Details of proposed fees

## Proposed ITE programme monitoring fees

20. The Teaching Council undertakes two monitoring services:

- **ITE programme monitoring.** The Teaching Council undertakes three different levels of programme monitoring: universal, tailored, and investigative. Teaching Council staff use the criteria set out in the *ITE Programme Approval, Monitoring, Review, and Moderation Policy* to determine which level of programme monitoring that an ITE provider will be subject to.
- **Annual reporting.** Annual reporting is intended to be a less extensive process than programme monitoring. It does not require in-person visits but instead involves desktop analysis of documentation that ITE providers already have. As noted above, because annual reporting fees are of general benefit to the ITE sector, ITE providers will not be charged for this task.

21. For monitoring costs, external monitors will only be engaged for deeper levels of monitoring, namely tailored and investigative monitoring. We propose below that external monitors will be hired for one day for tailored monitoring, and two days for investigative monitoring. Tailored and investigative monitoring can either be undertaken online or in-person. Below in Table 1 we outline the costs for monitoring of one programme. Fees to monitor two or more programmes offered by one ITE provider will cost more. The initial costs of monitoring will be covered by the Teaching Council, and once the monitoring process is complete, ITE providers will be charged for the actual and reasonable costs of monitoring.

**Table 1. Proposed monitoring fees of one programme by level**

Level of monitoring	Online	Pre-monitoring Teaching Council administrative fees	Teaching Council desktop analysis fees <sup>9</sup>	External monitor fees <sup>10</sup>	External monitor report writing fees	Accommodation fees <sup>11</sup>	Travel fees <sup>12</sup>	Taxi, mileage, and parking fees <sup>13</sup>	Total proposed fees (\$), excl. GST
Universal monitoring (level one)	Online	\$60	\$300 (four hours)	N/A		N/A	N/A	N/A	\$360
Tailored monitoring (level two)	In person	\$60	\$300 (four hours)	\$800 (one day)	\$400 (four hours)	N/A	\$760	\$91	\$2,411
	Online	\$60	\$300 (four hours)	\$800 (one day)	\$400 (four hours)	N/A	N/A	N/A	\$1,560
Investigative monitoring (level three)	In person	\$60	\$600 (eight hours)	\$1,600 (two days)	\$800 (one day)	\$180	\$760	\$91	\$4,091
	Online	\$60	\$600 (eight hours)	\$1,600 (two days)	\$800 (one day)	N/A	N/A	N/A	\$3,060

## Proposed ITE programme review fees

22. Reviews can take several forms. If the Teaching Council decides a review panel is unnecessary, the review may be either a self-assessment by the ITE provider, or a desktop analysis review by Teaching Council staff. In both occurrences, the review will require a desktop analysis review by Teaching Council staff. The fees for that analysis are outlined in Table 2 below.

<sup>9</sup> Charged at \$75 per hour.

<sup>10</sup> Charged at \$100 per hour, based on current NZQA rates for monitors.

<sup>11</sup> Charged at \$180 per person per night based on average accommodation costs for an ITE programme approval panel.

<sup>12</sup> Charged at \$760 per person based on average flight costs for an ITE programme approval panel.

<sup>13</sup> Charged at \$91 per person based on average costs for an ITE programme approval panel.

23. If a review panel is considered necessary, they will consist of an independent chair, and several panel members who may be ITE teacher educators, teachers, Māori representatives, Pacific people's representatives, NZQA representatives (as appropriate), and people with expertise in assessment, curriculum design, and inclusive education.

24. The detailed fees below are for one-day review panels comprising of two, three, or four panel members to cover the various expertise a panel may require and an independent chair. Additionally, a Teaching Council representative will attend. Options are provided for an online review panel, and a kanohi ki te kanohi (in-person) review panel. All charges below detail fees for a review of one programme. A review of two or more programmes offered by one provider will cost more.

25. The charges are largely based on the current fees for ITE programme approval panel costs for both panel members and Teaching Council staff.<sup>14</sup> Fees for review panels are proposed to be cheaper than programme approval panels because review panels will aim to last one day, while they take three days for programme approvals.

**Table 2. Proposed desktop analysis review fees**

Role	Teaching Council fixed administrative fee	Teaching Council representative fee	Post-desktop analysis administration fee	Total proposed fees (\$), excl. GST
Teaching Council representative	\$60	\$600 <sup>15</sup>	\$200	\$860

**Table 3. Proposed review panel fees (for online, one day, two-member review panel)**

Role	Pre-panel fee	Panel fee	Post-panel administration fee	Total proposed fees (\$), excl. GST	Explanation/rationale
Panel member 1	\$320	\$960		\$1,280	<b>Panel Members and Chair:</b> Panel fees are a daily rate. All preparation is encompassed in the pre-panel fee. The pre-panel event discusses what questions members have prior to the event and sets the direction for the panel.
Panel member 2	\$320	\$960		\$1,280	
Panel Chair	\$480	\$1,920		\$2,400	
Teaching Council representative (present at panel)	\$600	\$600	\$200	\$1,400	<b>Teaching Council Representative:</b> The pre-panel and panel fees have been taken from the schedule of ITE fees, which includes panels.
Teaching Council fixed administrative fee			\$60	\$60	The post-panel administration fee is a set or fixed fee for each panel as outlined in the current fees schedule.
<b>Total proposed fees</b>				<b>\$6,420</b>	

<sup>14</sup> See Teaching Council, *Initial Teacher Education: Panel Information for Initial Teacher Education Providers*, 2022, Appendix One.

<sup>15</sup> Eight hours at \$75 per hour.





**Table 4. Proposed review panel fees for one day, in person, three-member review panel (additional costs to those outlined in Table 3)**

Role	Proposed fees (\$), excl. GST
Costs of panel members and chair, Teaching Council representative and administration fee (as detailed above in Table 3)	\$6,420
Flight costs for two panel members, one chair and one Teaching Council staff member (at \$760 per person)	\$3,040
Cost of taxi, mileage, and parking (at \$91 per person)	\$364
<b>Total proposed fees</b>	<b>\$9,824</b>

**Table 5. Proposed review panel fees (for online, one day, three-member review panel)**

Role	Pre-panel fee	Panel fee	Post-panel administration fee	Total proposed fees (\$), excl. GST	Explanation/rationale
Panel member 1	\$320	\$960		\$1,280	<b>Panel Members and Chair:</b> Panel fees are a daily rate. All preparation is encompassed in the pre-panel fee. The pre-panel event discusses what questions members have prior to the event and sets the direction for the panel.
Panel member 2	\$320	\$960		\$1,280	
Panel member 3	\$320	\$960		\$1,280	
Panel Chair	\$480	\$1,920		\$2,400	
Teaching Council representative (present at panel)	\$600	\$600	\$200	\$1,400	<b>Teaching Council Representative:</b> The pre-panel and panel fees have been taken from the schedule of ITE fees, which includes panels.
Teaching Council administrative fixed fee			\$60	\$60	The post-panel administration fee is a set fee for each panel as outlined in the current fees schedule.
<b>Total proposed fees</b>				<b>\$7,700</b>	

**Table 6. Proposed review panel fees for one day, in person, three-member review panel (additional costs to those outlined in Table 5)**

Role	Proposed fees (\$), excl. GST
Costs of panel members and chair, Teaching Council representative and administration fee (as detailed above in Table 5)	\$7,700
Flight costs for three panel members, one chair and one Teaching Council staff member	\$3,800
Cost of taxi, mileage, and parking	\$455
<b>Total proposed fees</b>	<b>\$11,955</b>



**Table 7. Proposed review panel fees (for online, one day, four-member review panel)**

Role	Pre-panel fee	Panel fee	Post-panel administration fee	Total proposed fees (\$), excl. GST	Explanation/rationale
Panel member 1	\$320	\$960		\$1,280	<b>Panel Members and Chair:</b> Panel fees are a daily rate. All preparation is encompassed in the pre-panel fee. The pre-panel event discusses what questions members have prior to the event and sets the direction for the panel.
Panel member 2	\$320	\$960		\$1,280	
Panel member 3	\$320	\$960		\$1,280	
Panel member 4	\$320	\$960		\$1,280	
Panel Chair	\$480	\$1,920		\$2,400	
Teaching Council representative (present at panel)	\$600	\$600	\$200	\$1,400	<b>Teaching Council Representative:</b> The pre-panel and panel fees have been taken from the schedule of ITE fees, which includes panels.
Teaching Council administrative fixed fee			\$60	\$60	The post-panel administration fee is a set fee for each panel as outlined in the current fees schedule.
<b>Total proposed fees</b>				<b>\$8,980</b>	

**Table 8. Proposed review panel fees for one day, in person, four-member review panel (additional costs to those outlined in Table 7)**

Role	Proposed fees (\$), excl. GST
Costs of panel members and chair, Teaching Council representative and administration fee (as detailed above in Table 7)	\$8,980
Flight costs for four panel members, one chair and one Teaching Council staff member	\$4,560
Cost of taxi, mileage, and parking	\$546
<b>Total proposed fees</b>	<b>\$12,384</b>



# Appendix Two: Schedule of current ITE programme approval fees

For reference, below we republish the current fees schedule for ITE programme approvals. This schedule has been in place since April 2023.<sup>16</sup>

Service area	Current charges (ex GST)	Updated and new fees from 2023 (ex GST)
<b>Pre panel preparation</b>		
Liaison with ITE providers and partners to ensure alignment of new programmes with Code and Standards and ITE requirements	\$no charge: costs absorbed by TC	\$2,590 per panel (fixed charge)
Portal licence fee and establishment support	\$no charge: costs absorbed by TC	\$50 per panel (fixed charge)
Organisation of panel, including contact with Chair and panellists, communications with Lead Advisors	\$no charge: costs absorbed by TC	\$1,590 per panel (fixed charge) – excludes travel for TC staff and panel members
<b>Sub-total pre-panel costs</b>	<b>\$no charge: costs absorbed by TC</b>	<b>\$4,230 per panel</b>
<b>Panel Assessment Event (based on a two- programme three-day panel event)</b>		
Panel Assessment including:	\$4,080 per panel	\$4,800
<ul style="list-style-type: none"> <li>• Desktop analysis and peer review of documentation RFI</li> <li>• Programme approval panel event</li> <li>• Panel report writing</li> </ul>		
<b>Subtotal panel preparation, assessment and approval costs</b>	<b>\$4,080</b>	<b>\$4,800*</b>
<b>Post Panel Administration</b>		
Approval of memo, final panel report and CE letters	\$no charge: costs absorbed by TC	\$200 per panel (fixed charge)
Administration support: invoicing providers and paying panel members	\$no charge: costs absorbed by TC	\$220 per panel (fixed charge)
<b>Total charges for pre-panel, programme approval, and post panel activities</b>	<b>\$4,080 per panel</b>	<b>\$9,450* per panel</b>
<b>Additional new charges</b>		
8.8 Change and Emergency Triage	\$no charge: costs absorbed by TC	\$590 per application
8.8 Change and Emergency Panel	\$no charge: costs absorbed by TC	\$630 (only if application requires an external panel – excludes panel costs)
TC presentations to students	\$no charge: costs absorbed by TC	\$200 per presentation (online) or in-person option if provider pays travel and time costs

\* Costs based on a 2-programme 3-day panel event. Shorter and longer panels will face slightly lower or higher costs respectively

<sup>16</sup> 'Schedule of increased fees to apply from 1 April 2023' from the Teaching Council's 'Updated Teaching Council charges for ITE providers' (letter sent to ITE providers in c. April 2023).



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