Consultation on proposed changes to Teaching Council of Aotearoa New Zealand fees

FINAL 28 January 2020

TEACHING COUNCIL

NEW ZEALAND | Matatū Aotearoa

Contents

Purpose of the consultation	3
At a glance	
About the Teaching Council	3
Summary of the proposed changes	4
Background and timeline	
Consultation and timeframe	
Why is the Teaching Council consulting about a proposed increase to current fees?	
Statutory functions of the Teaching Council – What we must do	
What it costs for the Teaching Council to deliver its functions	
Reasonableness of Teaching Council costs	
Current funding framework	
Legal authority to set fees	
Principles for setting fees	
Current sources of funding	
Teaching Council reserves	
Forecast financial position	
Improving efficiencies and reduction of expenditure	
Professional Responsibility (Conduct and Competence)	
Registration/certification and renewal of practising certificates	
Fees out of alignment with other professional regulatory bodies	
Options for fee changes being consulted for implementation in mid-2020	
Proposed Professional Responsibility Levy	
Proposed increase to registration/certification fee for overseas applicants and Australian	ΤĊ
registered teachers	16
Proposed increase to fee for teachers moving from a Provisional or 'Subject to Confirmation	
Tiwhikete Whakaakoranga Pūmau Full Practising Certificate (Category Two) to a Tiwhikete	
Whakaakoranga Tūturu Full Practising Certificate (Category One)	
	Τ,
Proposed discontinuance of transitional rebate for teachers moving from provisional to full	17
practising certificate within a triennial cycle	
Fees to be kept under regular review	
Changes to payment methods for fees	
For employers	
Impact of new fees	
Summary	Τ2
Appendix One: Fees (GST inclusive) charged by the Teaching Council compared to other New	00
Zealand professional bodies	20
Comparison to Australian teacher registration fees	
Appendix Two: Impact of fees proposals	
Impact of Option 1 on teachers	
Impact of Option 1 on Teaching Council financial sustainability	
Impact of Option 2 on teachers	
Impact of Option 2 on Teaching Council financial sustainability	
Appendix Three: Forecast operating costs by statutory function	
Appendix Four: 2020 Consultation feedback template for written feedback	
Contact information	
Privacy & Consent	
Feedback on Teaching Council fee proposals	
Comments:	. 26



Purpose of the consultation

The Teaching Council of Aotearoa New Zealand ('Teaching Council') is consulting on proposed changes to fees charged to teachers for initial registration and certification, and subsequent renewals of practising certificates.

At a glance

The Teaching Council is concerned that it cannot deliver its statutory obligations with the current fee settings beyond June 2020.

After carefully considering how to achieve financial sustainability, the Council has taken the position that a fee increase is needed from 01 July 2020. No final decision on an increase will be made until after those affected have been consulted, and their views considered with an open mind, consistent with our statutory obligations.

To address this, the Teaching Council is consulting on new fees to take effect from 1 July 2020 and has proposed two options for consultation. The Council is seeking feedback from teachers on their preferences and the proposed fee increases under each consultation option.

Feedback is being sought by **21 February 2020** using the <u>online survey form</u>. If submitters are unable to use the <u>online survey</u>, the forms prescribed in **Appendix Four** can be emailed to <u>feedback@teachingcouncil.nz</u>.

About the Teaching Council

The Teaching Council of Aotearoa New Zealand is the professional body representing all New Zealand registered teachers from early childhood education through to primary and secondary schooling in English and Māori medium schools.

We are an independent statutory entity, which gives us the strategic independence to set our own work programme (informed by our continuing engagement and dialogue with the sector and the parameters we've been given by law), in the interests of teachers and learners. This contrasts with our predecessor, the New Zealand Teachers Council, which was a Crown agency and whose work programme was set by the Minister of Education and largely regulatory in nature.

The Teaching Council was established by the Education (Amendment) Act 2015, which amended the Education Act 1989, to raise the status of the teaching profession by championing good practice, new ideas, inspirational leadership, strengthened accountability and high standards. Our role is to help attract the brightest, and the best, to the teaching profession and keep them there for longer.

We speak up and out for our profession through building the public's understanding of the role quality teaching and educational leadership play in building a strong and successful nation.

We have a much broader mandate than the New Zealand Teachers Council which we replaced on July 1, 2015. Section 377 of the Education (Amendment Act) Act 2015 defines our purpose:

"to ensure safe and high-quality leadership, teaching, and learning for children and young people in early childhood, primary, secondary, and senior secondary schooling in English medium and Māori medium settings through raising the status of the profession."

In September 2018 the Education (Teaching Council of Aotearoa New Zealand) Amendment Act renamed the Education Council as the Teaching Council. The Act changed the Council's name and



governance arrangements to include elected representatives; however, the roles and functions of the organisation remained the same and can be summarised as follows:

- a. Professional leadership including teacher capability and policy
- b. Registration and Certification of teachers
- c. Professional Responsibility including teacher conduct and competence

Summary of the proposed changes

Since establishment on 01 July 2015 the Teaching Council has received a significant amount of establishment and transition funding from government on the understanding that the organisation is required to be independently financially sustainable from 01 July 2020.

The current three-yearly fee of \$220.80 paid by New Zealand teachers for registration/certification, or renewal of a practising certificate, was last increased in 2010, despite the significant expansion of the functions of the Teaching Council of Aotearoa New Zealand since its establishment on 1 July 2015

With the end of government transition funding on 30 June 2020, and current teacher fees only covering around 40% of the expenditure required to carry out our functions, we are concerned that we will be unable to deliver our statutory obligations with the current fee settings beyond June 2020. We are therefore consulting on proposed options to increase fees to ensure the ongoing financial sustainability of the Teaching Council.

The table below sets out the proposed fees/fees structure for both consultation options in comparison to the current fees:

Table 1 - Current and Proposed Fees

I am	What you currently pay	What's proposed you would pay under Option 1	What's proposed you would pay under Option 2
A Registered teacher renewing my current practising certificate ¹ :	\$220.80 for 3 years	\$470° for 3 years	\$500° for 3 years
A graduate from an approved New Zealand Initial Teacher Education (ITE) programme applying for Kaiako Whai Rēhitanga Teacher Registration and a Tiwhikete Whakaakoranga Tōmua Provisional Practising Certificate:	\$220.80 for 3 years	\$470 ^a for 3 years	\$300 ^a for 3 years
An overseas trained teacher ² applying for Kaiako Whai Rēhitanga Teacher Registration and a Tiwhikete Whakaakoranga Tōmua Provisional Practising Certificate:	\$302.57 for 3 years	\$570 ^{a,b} for 3 years	\$400 ^{a,b} for 3 years
A provisionally certificated or certificated 'Subject to Confirmation' / Tiwhikete Whakaakoranga Pūmau Full Practising Certificate (Category Two) teacher now	\$302.57 for 3 years	\$570 ^{a,c} for 3 years	\$600 ^{a,c} for 3 years

¹ Under the new 'Policy for Teacher Registration, Practising Certificates and Limited Authority to Teach' which will come into effect on or before 1 July 2020 this will apply to any teacher renewing a current Practising Certificate including Tiwhikete Whakaakoranga Tūturu | Full Practising Certificate (Category One) and Tiwhikete Whakaakoranga Pūmau | Full Practising Certificate (Category Two) and Tiwhikete Whakaakoranga Tōmua | Provisional Practising Certificate



^a Includes the proposed <u>Professional Responsibility Levy</u> of \$135

 $^{^{2}}$ Includes applications made under the Trans-Tasman Mutual Recognition Agreement (TTMRA)

^b Includes an additional fee of \$100 in consideration of the additional costs incurred in evaluating overseas applications

^c Includes an additional fee of \$100 in consideration of the additional costs incurred in evaluating these applications

applying for Tiwhikete Whakaakoranga Tūturu Full Practising Certificate (Category One):			
Lodging my renewal application <u>after the expiry</u> date of my current practising certificate ³ :	\$270.80 ^f for 3 years	\$570 ^{a,d} for 3 years	\$600 ^{a,d} for 3 years
Applying for a Türanga Whakaako Whai- herenga Limited Authority to Teach (LAT):	\$168.66 for 3 years \$112.44 for 2 years \$56.22 for 1 year	\$470° for 3 years \$313° for 2 years \$157° for 1 year	\$500° for 3 years \$333° for 2 years \$167° for 1 year
A Registered teacher who hasn't completed any teaching in New Zealand in the last 5 years applying for a Returning to Teaching in Aotearoa New Zealand Practising Certificate ⁴ :	N/A	\$470° for 3 years	\$500° for 3 years
A graduate from an approved New Zealand ITE programme applying for Kaiako Whai Rēhitanga Teacher Registration only:	N/A	\$470 for 3 years	\$300 for 3 years

In April 2017 the Education Council consulted with the teaching profession on the introduction of new fees and proposed fee increases. Due to the announcements of several major education system reviews, these proposals were not progressed at the time.

The current consultation will focus on what teachers pay for, when they pay it and how much they pay. Unlike the 2017 consultation process which related to a single proposed option, the current consultation puts forward two alternative options for the teaching profession and other affected parties to consider.

Both options propose an increase to the current fees paid by teachers from 01 July 2020. However, the second option seeks to reduce the financial impact on beginning teachers based on feedback that we should try to make the fee more affordable for graduates who are seeking their first teaching role and are less able to pay a full fee. Option 2 proposes that the fee for initial registration and a practising certificate for a beginning teacher is set at 60% of the renewal cost for existing teachers.

Both proposed options also include a <u>Professional Responsibility levy</u> of \$135 included in the total fee which represents the current cost of operating the mandated conduct and disciplinary processes under the current legislation and <u>Teaching Council Rules 2016</u>. Professional Responsibility is an area that teachers can directly influence to reduce future costs.

An additional fee of \$100 has been proposed for:

- overseas applicants including Australian registered teachers;
- teachers going from a provisional certificate to full practising certificate; and
- teachers who apply to renew their practising certificate after the expiry date of their current certificate.

What teachers would actually pay under each proposed option depends on the year they apply for registration/certification, or renewal, as it is proposed that fees would be subject to annual increases to offset the impact of inflation.

⁴ Comes into effect under the <u>'Policy for Teacher Registration, Practising Certificates and Limited Authority to Teach'</u> or before 1 July 2020



³ The Late Fee applies where a teacher is currently employed in a teaching position where they do not hold a current certificate of the kind required to legally undertake that role and applies for registration or certification.

f Includes the existing Late Fee of \$50

^d Includes the proposed Late Fee of \$100

^e Includes the proposed Professional Responsibility Levy of \$135 per 3 years on a pro-rata basis

The earliest date that any proposed fee increase would come into effect, if implemented following consultation, is **1 July 2020**.

The Teaching Council has an open mind and is seeking your input into which proposed consultation option, if any, should be adopted and implemented.

Background and timeline

The current triennial fee of \$220.80 paid by New Zealand teachers for registration/certification, and renewal of a practising certificate, was last increased in 2010 by the Teaching Council's predecessor, the New Zealand Teachers Council, and has not been increased since.

A 2012 Review of the New Zealand Teachers Council concluded that income from teachers' registration fees was insufficient to register teachers, maintain the register and share registration information with legitimate users, let alone undertake building a broad professional community, public reputation, quality assurance or professional leadership. The 2012 report recommended reviewing the current fee levels to bring them in line with other major state sector social service professions, but this was not subsequently actioned.

In response to increasing operating deficits, in November 2014 the New Zealand Teachers Council commissioned financial specialist Jeffrey Bull to undertake an analysis of the organisation's finances, to assess the efficiency of the current operation and the case for an increase in fees.

The Bull review concluded that there was a strong need for a fees increase to preserve the New Zealand Teachers Council's financial position and prevent it from becoming insolvent by October 2017.

The Education Amendment Act 2015:

- (a) Disestablished the New Zealand Teachers Council;
- (b) Established the Education Council of Aotearoa New Zealand (the Education Council) as an independent statutory body as at 1 July 2015;
- (c) Substantially expanded the Council's statutory role, functions, and powers compared with its predecessor; and
- (d) Required the Council to operate in a financially responsible manner and to prudently manage its assets and liabilities.

In 2015, the new Education Council noted the recommendation of the 2014 Review that fees should be reviewed; but decided not to seek an increase in fees until further analysis and consultation could be undertaken and to honour the commitment made by the Transition Board in March 2015 not to increase fees in the first year of establishment.

A further analysis of the financial position of the new Education Council in early 2016 indicated that without additional revenue, the Council could be insolvent by March 2018.

In October 2016 Cabinet agreed to provide the Education Council with interim funding of \$21.34m for the period through to 30 June 2019 to enable sufficient time for the Education Council to fully investigate issues relating to financial sustainability and to consult with the profession on new fees that would take effect from 1 July 2019.

To determine the level of fee revenue required for the Council to be financially sustainable, the costs of delivering the statutory functions of the Council were modelled in February/March 2017 with the assistance of Deloitte (who had been engaged as the Education Council's financial advisors).



The Deloitte financial modelling used to determine proposed new fees was reviewed by the Ministry of Education as part of their review of the Council's development of a Business Plan. PricewaterhouseCoopers also reviewed the modelling when they undertook a further independent financial review of the Council in October 2017.

The Education Council consulted on the introduction of new fees and fee increases in April 2017 and considered the feedback on the proposed fees and related issues over the course of several subsequent meetings. In September 2017 the Teaching Council agreed a new fees regime and were ready to announce new fees. However, due to the initially unclear outcome of the September 2017 general election, the Council subsequently decided to defer making an announcement at that time until they had spoken to the new Minister of Education about funding.

In November 2017, the new Minister of Education announced a review of Tomorrow's Schools including a review of the roles and functions of education sector entities such as the Education Council of Aotearoa New Zealand. Considering this announcement, the Council decided in February 2018 to put any decision on fees on hold until the functions of the Council were confirmed as this could impact on the level of fee income required.

When it became apparent that the outcome of the Tomorrow's Schools review was not likely to be finalised until after the 30 June 2019 deadline to achieve financial sustainability, Council engaged with the Ministry of Education to discuss options post 30 June 2019.

At that time, the financial model was further reviewed, and it confirmed that the Education Council would have a deficit of approximately \$9.6m in the 2019/20 financial year without an increase in fees or alternative revenue. A briefing paper to the Minister was prepared by the Ministry (with assistance from the Council) in October 2018 that provided three options.

They were:

- (a) That the Council go ahead and announce new fees; or
- (b) That the Minister extends the funding agreement by a further year (the Council sought a two-year extension; however, this was not supported by the Ministry or the Minister); or
- (c) That the Minister agrees to extend the funding agreement and the Council announces a partial fee increase.

In February 2019, Cabinet approved an extension to the funding agreement for a further year to 30 June 2020, on condition that the Teaching Council would be financially sustainable from 1 July 2020.

Following the first Teaching Council elections in March 2019, the current Teaching Council commenced their three-year term of office on 1 July 2019.

Following its review of the Teaching Council's financial model and the requirement to become financially sustainable from 1 July 2020, the Teaching Council resolved that it needs to consult with the teaching profession and other affected parties this financial year on implementing proposed fee changes by mid-2020, so that it can continue to perform its statutory functions and responsibilities in a sustainable manner from 1 July 2020.

This is consistent with the Teaching Council's statutory obligation under clause 7 of Schedule 21 of the Education Act to ensure that it operates in a financially responsible manner and, for this purpose, that it prudently manages its assets and liabilities.



Consultation and timeframe

The Teaching Council is now consulting with the teaching profession and other affected parties on two options proposing new fees from July 2020, consistent with its obligation to act in accordance with the rules of natural justice.5

After carefully considering how to achieve financial sustainability, the Council has taken the position that a fee increase is needed from 01 July 2020. No final decision on an increase will be made until after those affected have been consulted, and their views considered with an open mind, consistent with our statutory obligations.

The Teaching Council has issued this consultation paper to give parties affected by the proposed fee changes relevant information regarding the proposal, and a reasonable opportunity to make an informed response.6

If the Teaching Council decides, following consultation, to introduce any of the proposed fees, the earliest implementation date for a change of fees would be 1 July 2020.

The Teaching Council is seeking your feedback before making any decision on whether or not to implement the proposed fee changes in Option 1 or Option 2. Your feedback on the consultation options is important.

The Teaching Council's preferred way to receive your submissions on the consultation options is by way of online survey. Please complete the online survey providing your feedback on the proposed fee change options to the Teaching Council by 5pm on 21 February 2020.

All submissions will be considered and taken into account by the Teaching Council with an open mind before it makes a decision whether to implement any proposed fee changes.

Should the Teaching Council decide to implement any of the proposed fee changes following consultation, we will communicate those decisions to teachers prior to publishing a notice in the Gazette.7

Why is the Teaching Council consulting about a proposed increase to current fees?

The legislation that established the Teaching Council requires it to be independently financially sustainable in performing its statutory functions by generating non-government revenue to cover all its costs.

Although the Teaching Council must exercise its own discretion, it is relevant that there has been no further Government grant commitment beyond 30 June 2020 to supplement funding in the future for the Teaching Council. It must therefore consider increasing fees to cover the costs of carrying out its statutory functions.

Statutory functions of the Teaching Council – What we must do

The Education Amendment Act 2015 and the Education Amendment Act 2019 have significantly expanded the Teaching Council's functions from those of the former New Zealand Teachers

⁷ The Teaching Council must notify all fees charged under s 383(1) in the Gazette under s 383(2) of the Education Act 1989. Fees prescribed under s 364(1) must be notified in the Gazette under s 364(2), and fees prescribed under s 372 must be notified under s 372(2).



⁵ Education Act 1989, s 382(3).

⁶ This is consistent with the core principles of consultation, as discussed in Wellington International Airport Ltd v Air New Zealand [1993] 1 NZLR 671 (CA) at 676.

Council. The 18 functions of the Teaching Council set out in section 382(1) of the Education Act 1989 are now as follows:

- (a) to provide leadership to teachers and direction for the education profession:
- (b) to enhance the status of teachers and education leaders:
- (c) to identify and disseminate best practice in teaching and leadership and foster the education profession's continued development in light of research, and evidence of changes in society and technology:
- (d) to carry out the functions under Part 31 relating to teacher registration:
- (e) to establish and maintain any criteria for teacher registration under Part 31 that the Education Council considers necessary or desirable:
- (ea) to review, at any time, the criteria for teacher registration established under paragraph (e) and, after consultation with the Minister,—
 - (i) vary, delete, or replace 1 or more of the criteria; or
 - (ii) add 1 or more criteria; or
 - (iii) delete all of the criteria and substitute new criteria:
- (f) to conduct, in conjunction with quality assurance agencies, approvals of teacher education programmes:
- (fa) to review, at any time, the standards for qualifications established under paragraph (f) and, after consultation with the Minister,—
 - (i) vary, delete, or replace 1 or more of the standards; or Reprinted as at 14 May 2019 Education Act 1989 Part 32 s 382 563
 - (ii) add 1 or more standards; or
 - (iii) delete all of the standards and substitute new standards:
- (g) to conduct, in conjunction with quality assurance agencies, approvals of teacher education programmes:
- (h) to establish and maintain-
 - (i) standards for ongoing practice; and
 - (ii) criteria for the issue of practising certificates of different kinds:
- (i) to ensure that appraisals made by professional leaders for the issue and renewal of practising certificates achieve a reasonable and consistent standard, by auditing and moderating the appraisals made for at least 10% of the practising certificates issued or renewed in each year:
- (j) to establish and maintain a code of conduct for teachers under section 387:
- (k) to monitor and enforce the requirements relating to mandatory reporting in this Part and Part 31:
- (I) to perform the disciplinary functions in this Part relating to teacher misconduct and reports of teacher convictions:
- (m) to set the criteria for reporting serious misconduct and for reporting on competence issues:
- (n) to perform the functions in this Part relating to teacher competence:
- (o) to co-ordinate a system providing for the vetting by the Police of all teachers:
- (p) to perform any other functions conferred on it by this Act or any other enactment.

What it costs for the Teaching Council to deliver its functions

We forecast the operating costs for the Teaching Council to deliver its core statutory functions will be \$18.3 million for the 2020-21 financial year, broken down as follows:

a. Professional Responsibility including teacher conduct and competence: \$8.4 million per annum.



- b. Professional leadership and teacher capability: \$5.0 million per annum.
- c. Registration and Certification: \$4.9 million per annum.

A further breakdown of the forecast operating costs for the Teaching Council to deliver its statutory functions is provided in Appendix Three.

Over the three-year period 01 July 2020 to 30 June 2023 the Teaching Council is forecasting it requires income of \$55.9 million to deliver its statutory functions. In that same three-year period, fees paid by teachers (excluding GST) are forecast to provide \$23.9 million in income at their current levels.

Reasonableness of Teaching Council costs

In considering whether or not to propose an increase in fees, the Teaching Council has been informed by factors including:

- i. the significant number of reviews of the organisation that have been undertaken in the past (discussed above in pages 5 and 6) that have concluded the need for fees to increase;
- ii. broad comparisons with the fees charged by other relevant professional bodies in New Zealand and Teacher Registration bodies in Australia (as set out in Appendix One), acknowledging that the ability to undertake detailed benchmarking of Teaching Council costs against those organisations is limited by significant differences in the scope of statutory functions and volume of 'members'; and
- iii. the legal requirement to fulfil all its statutory roles, functions, and obligations under section 382 and schedule 21 of the Education Act 1989.

The functions that the Teaching Council is solely responsible for performing serve important purposes, including quality assurance of Initial Teacher Education and teacher discipline, competence and conduct⁸, which are critical to ensuring the safety of children and young people in educational settings, and quality teaching. Accordingly, there are potentially serious ramifications for the reputation of the teaching profession, child safety, and the quality of education if the Teaching Council lacks the capability to perform its statutory functions due to inadequate funding.

Current funding framework

Legal authority to set fees

The Teaching Council has the power to set fees under sections 364, 372 and 383 of the Education Act 1989, including for:

- (a) registration effected in different circumstances:9
- (b) the issue of practising certificates of different kinds;¹⁰
- (c) the granting of a limited authority to teach;11
- (d) any addition or alteration to a person's registration as a teacher;12
- (e) any addition or alteration to a person's limited authority to teach;13

⁸ Education Act 1989, ss 382(1)(d)-(1)(o).

⁹ Education Act 1989, s 364(1)(a). The Teaching Council may also charge fees for any addition or alteration to a person's registration as a teacher (s 383(1)(a)), and recover any reasonable costs incurred in the proposed or actual cancellation of a person's registration as a teacher (s 364(5)).

¹⁰ Education Act 1989, s 364(1)(b). The Teaching Council may also charge fees for any addition or alteration to a person's practising certificate (s 383(1)(b)).

¹¹ Education Act 1989, s 372(1).

¹² Education Act 1989, s 383(1)(a).

¹³ Education Act 1989, s 383(1)(b).

- (f) any addition or alteration to a person's practising certificate;¹⁴
- (g) inspection of the register of registered teachers or any other register or any other documents kept by the Teaching Council that are open to inspection;¹⁵
- (h) the supply of a copy of any entry in a register or other documents kept by the Teaching Council that are open to inspection. 16
- (i) the provision of professional leadership;¹⁷
- (j) costs relating to the performance of disciplinary functions;¹⁸
- (k) any other matter for which this Act provides that the Teaching Council may charge fees;¹⁹ and
- (I) the provision of goods and services.²⁰

The Teaching Council's fee-setting powers are broadly stated, and do not prescribe criteria limiting when the Teaching Council may fix a fee, or the level of such a fee. Nor does the Teaching Council, as an independent statutory body, require Ministerial approval in order to prescribe fees.

Principles for setting fees

Although the Teaching Council has a broad statutory discretion when prescribing fees, it has also considered existing guidance on setting charges in the public sector, including the Treasury's *Guidelines for Setting Charges in the Public Sector*²¹ and the Office of the Auditor General's *Good Practice Guide: Charging fees for public sector goods and services*, in developing the proposed fee changes.²²

Current sources of funding

Excluding temporary financial support from the government, at present, the Teaching Council's funding is mainly derived from fees charged for teachers' registration, practising certificates, and limited authorities to teach. These fees comprised \$7.631 million of the Teaching Council's total revenue of \$23.031 million (33%) in the 2018/19 fiscal year.

Fees are the primary fixed source of income the Teaching Council receives to meet all ongoing costs associated with its statutory functions, as well as its operating and administration expenses and secretariat costs.

Teaching Council reserves

The Teaching Council's Investment Cash and Reserves policy provides that the Council seek to maintain an Operating Reserve equivalent to three months average operating expenditure. The purpose of the reserve is to ensure that the Council can financially weather any unexpected events.

The Teaching Council is forecasting to have approximately \$6.8 million in reserves as at 30 June 2020, around \$1.7 million more than the minimum specified requirement.

The Teaching Council carefully considered using some portion of its reserves to lessen the impact of any fee increase on teachers. However, this one-off use of reserves would not address the ongoing funding shortfall. The Teaching Council considered the short-term benefit of an initial lower fee for the first three years against the long-term loss of reserves in case of unexpected events.

²² Office of the Controller and Auditor General Good Practice Guide: Charging fees for public sector goods and services (2008).



¹⁴ Education Act 1989, s 383(1)(c).

¹⁵ Education Act 1989, s 383(1)(d).

¹⁶ Education Act 1989, s 383(1)(e).

¹⁷ Education Act 1989, s 383(1)(f).

¹⁸ Education Act 1989, s 383(1)(g).

¹⁹ Education Act 1989, s 383(1)(h).

²⁰ Education Act 1989, s 383(5).

²¹ The Treasury Guidelines for Setting Charges in the Public Sector (2002).

The Teaching Council has decided to retain the current level of reserves in order to meet its statutory duty to operate in a financially responsible manner and to prudently manage its assets and liabilities.

Forecast financial position

An overview of the Teaching Council's actual and forecast financial performance of the New Zealand Teachers Council and the Education/Teaching Council from the 2012/13 year through to 2022/23 is set out in the table below.

In the 2018/2019 financial year the Council received funding from the government to develop an online platform to deliver its core functions. This funding was recognised as grant revenue when it was received in the financial year; and resulted in an operating surplus of \$3.484m for that year. The Council spent all of the grant revenue received from the government on the project during the year; however, approximately 50% of the project costs were not treated as operating expenditure as it was used to develop a capital asset. The capital costs will be expensed as depreciation and amortisation charges over its useful life.

The forecasts are based on the Business Plan approved by the Teaching Council in June 2019. This demonstrates that the fees currently prescribed by the Teaching Council do not allow it to sustainably fund the performance of its statutory functions. The 2019/20 financial year reflects the budget approved by the Council in June 2019.

The following three years are based on the financial model with the current (2010) fee settings, which results in a significant deficit each year. Under this scenario, in the absence of any fee changes, the Teaching Council would be insolvent by the third quarter of the 2020/21 financial year.

Financial Year	Total Income (\$m)	Total Expenditure (\$m)	Operating Surplus (Deficit) before government transition funding (\$m)	Government transition funding ²³ (\$m)	Operating Surplus (Deficit) after government transition funding (\$m)
2012/13 Actual	\$7.702	\$7.719	(\$0.017)	-	(\$0.017)
2013/14 Actual	\$8.046	\$8.622	(\$0.576)	-	(\$0.576)
2014/15 Actual	\$8.942	\$9.402	(\$0.460)	-	(\$0.460)
2015/16 Actual	\$16.680[2]	\$10.520	\$6.160	-	\$6.160
2016/17 Actual	\$9.432	\$14.180[3]	(\$4.748)	\$4.934	\$0.186
2017/18 Actual	\$10.156	\$17.754[4]	(\$7.598)	\$6.484	(\$1.114)

²³ Initial Cabinet funding package of \$21.34m less \$0.785m transferred to NZ Police to fund a priority vetting service plus extension for 2019/20 of \$9.60m

^[4] The increase in expenditure in 2017/18 through 2019/20 is related to one-off costs associated with the online services project.



^[2] The increase in revenue in 2015/16 reflects the one-off revenue recognition policy adjustment (see note 18, 2015/16 Education Council Annual Report) and the Grant funding from the Government to assist with the establishment of the Council.

^[3] The increase in expenditure between 2015/16 and 2017/18 largely reflects the growth in the Education Council required to deliver its expanded statutory functions.

2018/19 actual	\$13.894	\$19.547	(\$5.653)	\$9.137	\$3.484
2019/20 forecast	\$9.862	\$20.247	(\$10.385)	\$9.600	(\$0.785)
2020/21 forecast	\$10.213	\$18.293	(\$8.080)	-	(\$8.080)
2021/22 forecast	\$9.208	\$18.586	(\$9.378)	-	(\$9.378)
2022/23 forecast	\$9.146	\$19.026	(\$9.880)	-	(\$9.880)

Improving efficiencies and reduction of expenditure

In considering whether it is necessary to introduce new fees, the Teaching Council has also taken significant steps, such as the introduction of online applications, to increase the efficiency of its operations with the aim of reducing the costs borne by the profession.

Although these efficiencies will save costs and time in the long-term, many of these measures are still being implemented, and there are costs involved in achieving these efficiencies, some of which are described below.

Professional Responsibility (Conduct and Competence)

The Teaching Council's statutory disciplinary role in teacher misconduct is vital to both protecting the safety of children and the reputation of the teaching profession.

Over the period 1 July 2016 to 30 June 2019, the Teaching Council received:

- 1,878 cases that were either resolved without investigation by <u>triage</u> process (419 cases) or were referred for formal investigation (1,459 cases);
- 980 cases requiring investigation that related to conduct;
- 479 cases requiring investigation that related to competence; and
- 241 cases were referred to the Disciplinary Tribunal 45 in the year ended 30 June 2017, 51 in the year ended 30 June 2018 and 155 in the year ended 30 June 2019.

Based on our analysis of these historic cases and most recent trends we would expect:

- to receive up to 650 new cases in 2019-20 and each subsequent year, of which around 75-80% will require investigation;
- that over 50% of these new cases are likely to be related to conduct with many being complex cases; and
- that over 50% of new cases related to conduct are likely to be referred to the Disciplinary Tribunal (up from 13% in 2016-17) due to changes stemming from the Education Amendment Act 2015 and the Teaching Council Rules 2016 that now require all cases that may constitute serious misconduct to be referred to the Disciplinary Tribunal.

These forecasts exclude cases that might arise as an outcome of the Royal Commission of Inquiry into Abuse in Care which reports back on 3 January 2023.

Registration/certification and renewal of practising certificates

The Teaching Council is in the process of rolling out a new registration policy and online registration and practising certificate application system to replace paper application forms. It will enable teachers to electronically submit an application and for this to be processed in a far timelier manner than the current paper-based system. The new online system has been funded by a government grant and is based on an education workforce shared platform.



Implementing an online system will reduce the time needed for teachers to complete compliance processes, improving the efficiency of the Teaching Council's services to the profession. It will bring administrative and compliance cost savings for both the Teaching Council and teachers by way of reduced printing, document management, data entry and fees for accessing certified copies of documents. An estimate of the anticipated efficiency savings has been factored into the two proposals.

Time saved in reduced administration and compliance will enable the Teaching Council to focus on supporting teachers by delivering increased capability and leadership development.

Fees out of alignment with other professional regulatory bodies

The Teaching Council has also undertaken a comparison of the fees it charges for the performance of its statutory functions and its provision of goods and services compared to other professional regulatory bodies in New Zealand and Australia (as set out in **Appendix One**). This comparison review indicated that the Teaching Council is a significant outlier compared to other bodies.

Options for fee changes being consulted for implementation in mid-2020

The Teaching Council is considering two separate options for increasing fees under section 383(1) of the Education Act 1989 to enable sufficient funding to deliver its increased statutory functions discussed above.

Both options, which are set out in the table below, are based on the Teaching Council's approved 2019/20 to 2022/23 Business Plan and a number of key assumptions, including (but not limited to):

- a. Teaching Council Personnel costs based on current mid-point salaries escalated over the period of the plan by inflation and a workforce plan to deliver the Teaching Council's functions;
- b. The provisions of the existing Council approved Investment, Cash and Reserves Policy of February 2019 will continue to apply, requiring Council to maintain an Operating Reserve equivalent to three months average operating expenditure;
- c. Other Operating Costs use the 2019/20 budget as a baseline, which is adjusted for CPI each year;
- d. The number of teachers holding a Practising Certificate remains constant at 104,000;
- e. There is no allowance for Police Vetting fees beyond the free standard service for organisations with Charitable status;
- f. The volume of Conduct and Competence cases will remain at a materially similar level to the 2019-20 financial year;
- g. That fees will be subject to an annual increase of 2.3% per annum to offset the cost of inflation.



I am	What you currently pay	What's proposed you would pay under <i>Option 1</i>	What's proposed you would pay under Option 2
A Registered teacher renewing my current practising certificate ¹ :	\$220.80 for 3 years	\$470° for 3 years	\$500° for 3 years
A graduate from an approved New Zealand Initial Teacher Education (ITE) programme applying for Kaiako Whai Rēhitanga Teacher Registration and a Tiwhikete Whakaakoranga Tōmua Provisional Practising Certificate:	\$220.80 for 3 years	\$470 ^a for 3 years	\$300° for 3 years
An overseas trained teacher ² applying for Kaiako Whai Rēhitanga Teacher Registration and a Tiwhikete Whakaakoranga Tōmua Provisional Practising Certificate:	\$302.57 for 3 years	\$570 ^{a,b} for 3 years	\$400 ^{a,b} for 3 years
A provisionally certificated or certificated 'Subject to Confirmation' / Tiwhikete Whakaakoranga Pūmau Full Practising Certificate (Category Two) teacher now applying for Tiwhikete Whakaakoranga Tūturu Full Practising Certificate (Category One):	\$302.57 for 3 years	\$570 ^{a,c} for 3 years	\$600 ^{a,c} for 3 years
Lodging my renewal application <u>after the expiry</u> <u>date</u> of my current Practising Certificate ³ :	\$270.80f for 3 years	\$570 ^{a,d} for 3 years	\$600 ^{a,d} for 3 years
Applying for a Türanga Whakaako Whai- herenga Limited Authority to Teach (LAT):	\$168.66 for 3 years \$112.44 for 2 years \$56.22 for 1 year	\$470° for 3 years \$313° for 2 years \$157° for 1 year	\$500° for 3 years \$333° for 2 years \$167° for 1 year
A Registered teacher who hasn't completed any teaching in New Zealand in the last 5 years applying for a Returning to Teaching in Aotearoa New Zealand Practising Certificate ⁴ :	N/A	\$470° for 3 years	\$500° for 3 years
A graduate from an approved New Zealand ITE programme applying for Kaiako Whai Rēhitanga Teacher Registration only:	N/A	\$470 for 3 years	\$300 for 3 years

Proposed Professional Responsibility Levy

Both proposed options include a Professional Responsibility levy of \$135 in the total fee which represents the current cost of operating the mandated conduct and disciplinary processes under the current legislation and Teaching Council Rules 2016. This approach reflects our view that teaching professionals collectively have the greatest ability to influence positive changes in regard to conduct and competence matters within the teaching profession.

Other professional bodies have chosen to charge a separate disciplinary levy that reflects the actual costs of dealing with complaints and disciplinary matters. The Teaching Council is not



 $^{^{\}rm a}$ Includes the proposed $\underline{\text{Professional Responsibility Levy}}$ of \$135

^b Includes an additional fee of \$100 in consideration of the additional costs incurred in evaluating overseas applications

^c Includes an additional fee of \$100 in consideration of the additional costs incurred in evaluating these applications

f Includes the existing Late Fee of \$50

^d Includes the proposed Late Fee of \$100

e Includes the proposed Professional Responsibility Levy of \$135 per 3 years on a pro-rata basis

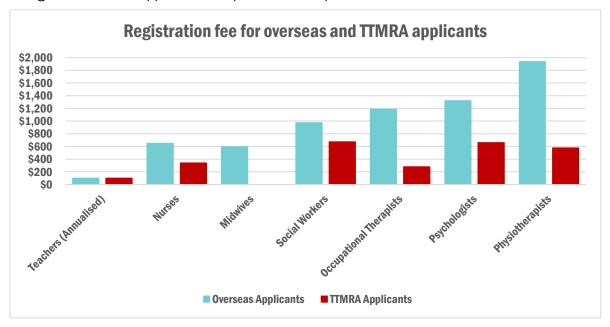
proposing such a separate fee but is proposing to clearly identify the current professional responsibility (teacher conduct and competence) costs within the total fee proposed.

The Teaching Council is currently undertaking work to review the reasonableness of the current threshold for serious misconduct under the legislation and Teaching Council Rules in case law reform is needed. If the current threshold was to change or where the costs associated with the Teaching Council's Professional Responsibility functions were to materially reduce, we would seek to transparently pass those savings on to teachers through a reduction in fees in subsequent years.

Proposed increase to registration/certification fee for overseas applicants and Australian registered teachers

The Teaching Council is proposing to increase the registration and issue of first practising certificate fee for overseas applicants (including those applying under the Trans-Tasman Mutual Recognition Agreement (TTMRA)). The fee of \$302.57 (GST inclusive) that the Teaching Council currently prescribes for registering and issuing a first practising certificate to such applicants is much lower than the fee charged by other professional regulatory bodies, which charge higher fees to reflect the greater administrative costs involved in processing such applications compared to domestic applicants.

The chart below demonstrates that the Teaching Council is a significant outlier in terms of the fees charged to overseas applicants compared to other professional bodies.



Overseas applicants from other professions also have to pay an additional fee for their first practising certificates. For example, an overseas (non-TTMRA) candidate applying to be registered as a nurse in New Zealand would pay \$650 for registration and \$110 for a one-year practising certificate, a total of \$760. This is nearly seven times the fee charged to overseas teacher applicants on an equivalent annual basis.

The Teaching Council is considering increasing the additional fee for overseas applicants from \$81.77 to \$100, consistent with its fee-setting powers under section 364(1)(a) of the Act.



The proposed fee increase considers the significant additional costs the Teaching Council incurs in evaluating overseas applications, which typically involves additional steps and increased complexity relative to applications from graduates of an approved New Zealand ITE programme.

The Teaching Council must assess whether the applicant is of good character and fit to hold a practising certificate, has sufficient language competency, and whether the applicant has the skills and experience appropriate to advance the learning of a student or group of students, or has skills that are in short supply.²⁴ The Teaching Council also must arrange for Police vetting to ensure the applicant have not been convicted of a specified offence as defined in the Vulnerable Children Act 2014.²⁵

Proposed increase to fee for teachers moving from a Provisional or 'Subject to Confirmation' / Tiwhikete Whakaakoranga Pūmau | Full Practising Certificate (Category Two) to a Tiwhikete Whakaakoranga Tūturu | Full Practising Certificate (Category One)

The Teaching Council is proposing to increase the fee for provisionally certificated teachers, or teachers certificated Subject to Confirmation / Tiwhikete Whakaakoranga Pūmau | Full Practising Certificate (Category Two), to be issued with a Tiwhikete Whakaakoranga Tūturu | Full Practising Certificate (Category One) valid for three years. This is to reflect the additional costs involved in evaluating those applications.

Proposed increase to the Late Fee

The Teaching Council is proposing to increase from \$50 to \$100 the additional late fee paid by teachers where they are currently employed in a teaching position where they do not currently hold certification of the kind required to legally undertake that role, and subsequently submit an application for registration or certification.

This proposed fee increase, if implemented, would be fixed in accordance with s 364(1)(a) of the Education Act 1989, which permits the Teaching Council to charge different fees for registration and certification effected in different circumstances.

The Council wants all teachers to submit their applications before their current certificate expires; however, approximately 10% of teachers submit their applications late and, if they are in a teaching position, then they would need to apply for an extension. This increases cost as Teaching Council staff have to undertake additional work. Ensuring that teachers meet the prescribed standard required to be issued with a practising certificate is critical to maintaining the safety of learners in Aotearoa New Zealand.

Proposed discontinuance of transitional rebate for teachers moving from provisional to full practising certificate within a triennial cycle

In 2015, the Teaching Council established a transitional practice of offering a rebate to teachers being issued with their first full practising certificate if there was greater than one year left on their provisional practising certificate. Prior to this, the teacher concerned effectively upgraded their current provisional certificate to a full certificate and maintained the existing expiry date and only paid the difference between the \$302 and \$220 fees. The rebate offer had been intended as a transitional arrangement, so the practice is being reviewed at the same time the teaching profession is being consulted on current fees.



²⁴ Education Act 1989, ss 366(2), 366(4)(a) and 368(2).

²⁵ Education Act 1989, s 366(4)(b).

The Teaching Council's experience has been that a significant number of teachers who are offered the rebate do not respond in order to uplift it. In many cases the administrative cost of offering the rebate outweighs the potential benefit to an individual teacher whose circumstances may qualify for the offer under the current practice.

In the context of the current consultation process on fees for practising certificates, the Teaching Council is consulting with teachers about whether this transitional arrangement is still needed. We therefore seek your feedback on whether the rebate offer should be discontinued.

Fees to be kept under regular review

The Teaching Council intends to keep its fees under regular periodic review to ensure that it can fund sufficient capacity and resources to meet its statutory functions, and to ensure that the level of fee charged remains adequate, taking into account factors such as inflation, reflected by changes in the consumer price index ('CPI') and labour cost index ('LCI').

The Teaching Council has included an allowance of 2.3% per annum in its financial modelling as projected cost increases for the 2021/22 and 2022/23 years and beyond.

The Teaching Council is committed to ensuring that it operates in a transparent and cost-effective manner, while also ensuring an appropriate balance is maintained between the effective discharge of its statutory responsibilities and affordability for the profession.

Changes to payment methods for fees

Many teachers can no longer have their Practising Certificate fees reimbursed under their current collective agreement and will be required to pay all applicable Teaching Council fees in full at the time of application.

The Teaching Council has no facility for teachers to pay fees by instalments in arrears as it is a legal requirement that all applicable fees are paid in full prior to a Practising Certificate being issued. Neither does the Teaching Council have the facility to support the pre-payment of fees by instalment in advance.

From the time that the Teaching Council's new digital services platform Hapori Matatū goes live in 2020, the only payment methods that will be available to teachers will be Debit / Credit card or internet banking via POLi. Payment via cash or cheque will not be available.

For employers

Where employers are making payment of Teaching Council fees on behalf of an individual teacher or a group of teachers, note that no alternate or bulk payment facilities exist. Separate payment in full for the applicable fees for each individual teacher is required at the time of application.



Impact of new fees

The Teaching Council has modelled the impacts of proposed increased fees in both options 1 and 2. They are set out in **Appendix Two**.

Summary

The Teaching Council is concerned that it cannot deliver its statutory obligations with the current fee settings beyond June 2020.

To address this, the Teaching Council has proposed two options for increasing fees and is seeking feedback on your preferred option and the proposed fee increases under each option.

Feedback is being sought by 21 February 2020 using the online survey form.

If consultees are unable to use the <u>online survey</u>, the forms prescribed in **Appendix Four** can be emailed to <u>feedback@teachingcouncil.nz.</u>



Appendix One: Fees (GST inclusive) charged by the Teaching Council compared to other New Zealand professional bodies

	April 2017			August 2019			
	New Zealand Applicant	Australian Applicant ²⁶	Overseas Applicant	New Zealand Applicant	Australian Applicant	Overseas Applicant	
Teaching Council (Equivalent Annual Fee)	\$73.60	\$100.86	\$100.86	\$73.60	\$100.86	\$100.86	
Nursing Council (Annual Fee)	\$110	\$340	\$650	\$110	\$340	\$650	
Midwifery Council (Annual Fee)	\$250			\$445		\$595	
Social Workers Registration Board (Annual Fee)	\$368	\$623	\$923.55	\$418	\$673.55	\$973.55	
Occupational Therapy Board (Annual Fee)	\$558	\$322	\$690	\$477	\$280	\$1,188	
New Zealand Psychologists Board ²⁷ (Annual Fee)	\$479	\$484	\$1,144	\$655	\$660	\$1,320	
Physiotherapy Board (Annual Fee)	\$477.23	\$230	\$1,532.50	\$555.50	\$576.50	\$1,936	

26 The fees listed for TTMRA and Overseas applications for annual practising certificates are those charged to obtain the first practising certificate. Subsequent practising certificates are charged at the NZ rate.

²⁷ The one-off registration fees charged by the New Zealand Psychologists Board and the Physiotherapy Board are higher for TTMRA and overseas applicants than for New Zealand graduates. The difference between the registration fee for these applicants compared to the New Zealand fee has been added to the application fee above.

Comparison to Australian teacher registration fees

Teacher Registration Bodies	Victoria	NSW	QLD	New Zealand (current)
# Registered / accredited / approved Teachers	103,856	163,899	108,220	137,183
Initial Registration / accreditation / approval Fee (One Off)	A\$131.28+	A\$100#	A\$150.85 [^]	NZ\$220.80~
Initial Registration / accreditation / approval Fee (interstate or overseas qualifications) (One Off)	A\$152.11+	N/A	A\$259	NZ\$302.57~
Annual fee for renewal of registration / accreditation / approval	A\$97.94+ (or A\$129.19 including late fee)	A\$100	A\$89.75 (or A\$120.30 including late fee)	NZ\$73.60~
Criminal Record Check	A\$56.26+	Not included	A\$15.25^	Included
Scope of Operations: Registration / Certification Conduct & Competence Professional Services Professional Leadership	✓ ✓ ✓ ×	✓ ✓ ✓ ×	✓ ✓ ✓ ×	✓ ✓ ✓
Responsible Organisation	VIT	NESA	QCT	Teaching Council
Total Revenue	A\$15.6M	A\$149M	A\$10.8M	NZ\$19.4M
Revenue derived from core Registration / accreditation / approval functions	A\$15.6M	A\$12.2M	A\$10.8M	NZ\$7.4M

⁺ See https://www.vit.vic.edu.au/registered-teacher/fees . From 2020 schedule of fees



[#] See https://educationstandards.nsw.edu.au/wps/portal/nesa/teacher-accreditation/how-accreditation-works/guide-to-accreditation/fees/. Excludes accreditation fees for Highly Accomplished (A\$605) or Lead Teacher (A\$715)

[^] See https://www.qct.edu.au/registration/fees As of November 2018. Registration is for a five-year period but payable annually. If the annual fee is not paid a restoration fee (of A\$84.60) is also payable

 $[\]sim \text{See $https://teaching.council.nz/sites/default/files/Education} \ 20 \text{Council} \ 20 \text{gazette} \ 20 \text{notice} \ 201 \ 202 \ 1$

[&]amp; Excludes accreditation fees for Highly Accomplished (A\$605) or Lead Teacher (A\$715)

Appendix Two: Impact of fees proposals

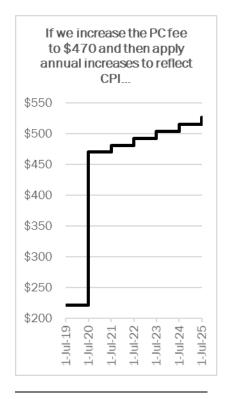
Impact of Option 1 on teachers²⁸

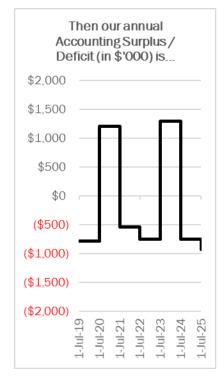
Option 1: Reset Base Case (inclusive of GST)	FY 2020/21	FY 2021/22	FY 2022/23	FY 2023/24	FY 2024/25	FY 2025/26
Proposed fee for a New Zealand Registered teacher to renew their current practising certificate ²⁹	\$470.00	\$480.82	\$491.87	\$503.19	\$514.76	\$526.60
Proposed fee for a graduate from an approved New Zealand ITE programme applying for Registration and a Provisional Practising Certificate ²⁹	\$470.00	\$480.82	\$491.87	\$503.19	\$514.76	\$526.60

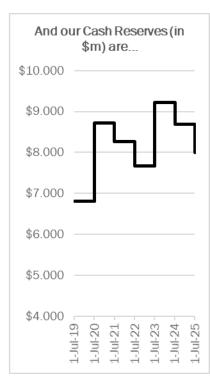
Impact of Option 1 on Teaching Council financial sustainability

Option 1: Reset Base Case (\$'000)	FY 2020/21	FY 2021/22	FY 2022/23	FY 2023/24	FY 2024/25	FY 2025/26
Forecast Income	\$19,496	\$18,051	\$18,271	\$20,792	\$19,238	\$19,472
Forecast Expenditure	\$18,293	\$18,586	\$19,026	\$19,496	\$19,982	\$20,466
Forecast Accounting Surplus / Deficit	\$1,203	-\$535	-\$755	\$1,297	-\$744	-\$993
Forecast Cash Reserves	\$8,714	\$8,263	\$7,663	\$9,222	\$8,693	\$8,003

Note: The forecast accounting surplus or deficit includes non-cash expenditure e.g. depreciation expense and excludes capital expenditure or any movements in working capital. The increase or decrease in cash reserves reflects the surplus / deficit after depreciation, capital expenditure, and movements in working capital.







 $^{^{28}}$ Option 1 includes all the proposed fees listed in Table 1 which are omitted here for the sake of simplicity



 $^{^{29}}$ Including indicative inflation indexing from 2020/21 onwards

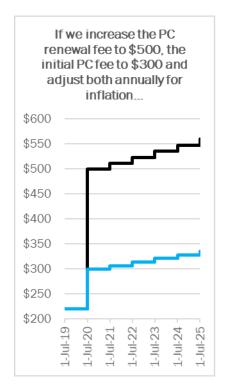
Impact of Option 2 on teachers³⁰

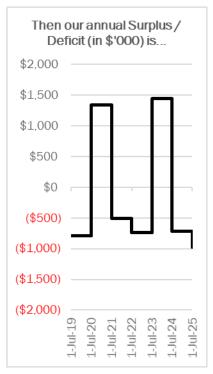
Option 2: Reduce Impact on Beginning Teachers (inclusive of GST)	FY 2020/21	FY 2021/22	FY 2022/23	FY 2023/24	FY 2024/25	FY 2025/26
Proposed fee for a New Zealand Registered teacher to renew their current practising certificate ²⁹	\$500.00	\$511.50	\$523.26	\$535.30	\$547.61	\$560.20
Proposed fee for a graduate from an approved New Zealand ITE programme applying for Registration and a Provisional Practising Certificate ²⁹	\$300.00	\$306.90	\$313.96	\$321.18	\$328.56	\$336.12

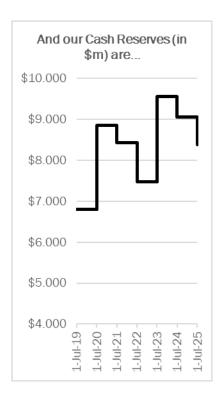
Impact of Option 2 on Teaching Council financial sustainability

Option 2: Reduce Impact on Beginning Teachers (\$'000)	FY 2020/21	FY 2021/22	FY 2022/23	FY 2023/24	FY 2024/25	FY 2025/26
Forecast Income	\$19,634	\$18,076	\$18,286	\$20,944	\$19,268	\$19,493
Forecast Expenditure	\$18,293	\$18,586	\$19,026	\$19,496	\$19,982	\$20,466
Forecast Accounting Surplus / Deficit	\$1,341	-\$511	-\$740	\$1,448	-\$714	-\$973
Forecast Cash Reserves	\$8,856	\$8,426	\$7,842	\$9,556	\$9,054	\$8,384

Note: The forecast accounting surplus or deficit includes non-cash expenditure e.g. depreciation expense and excludes capital expenditure or any movements in working capital. The increase or decrease in cash reserves reflects the surplus / deficit after depreciation, capital expenditure, and movements in working capital.





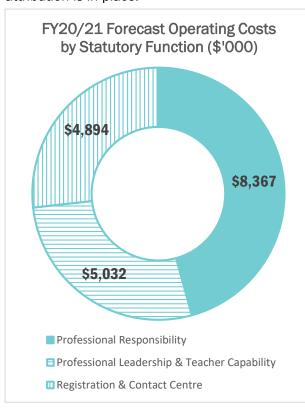


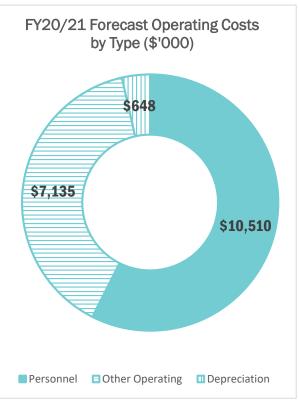
 $^{^{30}}$ Option 2 includes all the proposed fees listed in Table 1 which are omitted here for the sake of simplicity



Appendix Three: Forecast operating costs by statutory function

In forecasting the operating costs for the Teaching Council to deliver its statutory functions, we have allocated corporate and project costs based on proportion of personnel costs, where no direct attribution is in place.





FY20/21 Forecast Costs (\$000s)	Direct Costs	Allocated Costs	Total Costs
Professional Responsibility			\$8,367
Personnel	2,821	1,790	4,611
Other Operating	2,057	1,421	3,478
Depreciation	-	278	278
Professional Leadership & Teacher Capability			\$5,032
Personnel	1,900	1,032	2,932
Other Operating	1,121	819	1,940
Depreciation	-	160	160
Registration & Contact Centre			\$4,894
Personnel	1,613	1,353	2,967
Other Operating	643	1,074	1,717
Depreciation	-	210	210
TOTAL	10,155	8,138	18,293

Appendix Four: 2020 Consultation feedback template for written feedback

Contact information

Name*			
Sector*	ECE	Primary	
	Intermediate	Secondary	
	Tertiary	Other	
	Kura	(Please Specify):	
Email*			
Role*	Teacher	Professional Le	ader 🗆
	Peak Body	Union	
		Other	
		(Please Specify):

Privacy & Consent

Written feedback, including your name and your submission in full may be published on the Teaching Council's website if you provide consent as indicated below.

Please check the box if you consent to publication of your written submission. \Box

Feedback on Teaching Council fee proposals

1) Please indicate whether you agree or disagree with the following proposals:

	Agree	Disagree	Don't Know / Unsure
Teachers applying for Registration and their first three-year practising certificate should pay a lower fee	0	0	0
Overseas teachers should pay a higher fee for registration and their first Provisional Practising Certificate to reflect the additional costs involved in evaluating their applications	0	0	0
Provisionally certificated teachers or teachers certificated 'Subject to Confirmation' should pay a higher fee when applying for full certification to	0	0	0



^{*} Mandatory fields for written submissions only

reflect the additional costs involved in evaluating those applications					
The Late Fee for a teacher to renew their practising certificate after the expiry date of their current certificate should increase from \$50.00 to \$100.00			0	0	0
Fee Rebates should discontinue for teachers who move from provisional certification to full certification		าด	0	0	0
2) Please indicate yo	ur preference for the two	optio	ns proposed:		
0	I would prefer Option 1	Beginning teachers and experienced teachers should pay the same amount			
0	I would prefer Option 2	Beginning teachers should pay a lower amount to support their entry into the teaching profession			
0	I have no preference for either option				
3) Please provide an consultation propo	y other feedback or compsals:	nments	s you may wish	n to make w	th regard to the

