

Governing Council

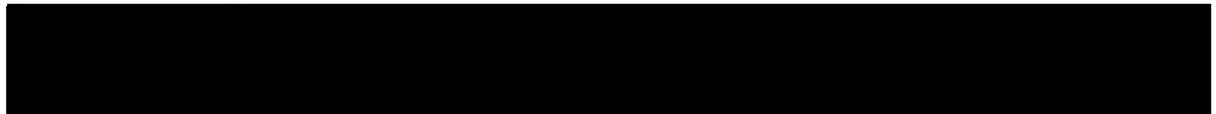
17 December 2021



17 Hakihea 2021 – Matairangi Boardroom

- 9:00am – 4:00pm
- Level 11, 7 Waterloo Quay, Pipitea

Topic: Governing Council Hui - 17th December
Time: Dec 17, 2021 09:00 AM Auckland, Wellington



Council Paper

Item 6
Council Meeting
17/12/2021

SUBJECT:	Options for consultation on 2022 fees and levies		
TO:	Governing Council		
FROM:	Tamahau Rowe, Tatai Heke Maori		
PREPARED BY:	[REDACTED]		
FOR:	<input checked="" type="checkbox"/> Approval	<input checked="" type="checkbox"/> Discussion	<input type="checkbox"/> Information

It is recommended that the Governing Council:

1. **Notes** the Governing Council was previously provided with an overview of themes from the feedback received during pre-consultation discussions with stakeholders that took place in September, October and November 2021.
2. **Discusses** and **Agrees** the proposed structure and content for the consultation document on 2022 fees and levies.
3. **Discusses** the analysis of options provided from the pre-consultation discussions and feedback and **Decides** whether to agree / disagree / or amend each.



Purpose

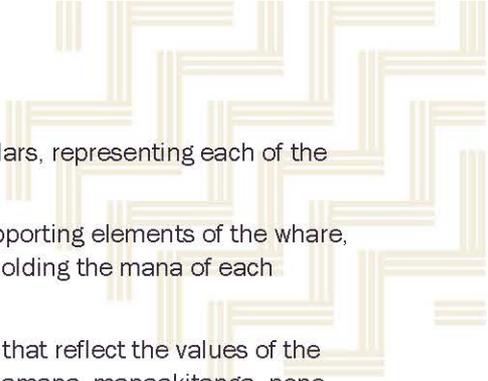
1. To support the Governing Council to discuss the proposed structure and high-level content for the fees and levies consultation document and to make decisions on what should be included and how the document should be structured.
2. To support the Governing Council to discuss the analysis of the design options proposed by stakeholders in the pre-consultation hui for setting fees and levies associated with each of the Council's mandatory functions, and to make decisions on which of those options will be included in the consultation document together with the rationale for inclusion or exclusion.
3. The decisions the Governing Council makes at the December meeting will inform the structure and detailed content of the draft consultation document that management will prepare for discussion at the Governing Council's January 2022 meeting, at which approval will be sought to commence consultation.

Background

4. The Council engaged in a series of pre-consultation hui with stakeholders in September and October 2021 to seek their feedback on the design of the consultation process and options that could be considered for setting fees and levies.
5. The information gathered from this engagement was provided as a general summary for the Governing Council meeting held 25 November 2021.
6. Additional feedback was gathered from a meeting of the Initial Teacher Education Advisory group (ITEAG) on 26 November.
7. The feedback was summarised into themes and sub-themes; additional work has also been undertaken to indicate how this feedback will be integrated into design of the consultation process and consultation document. We expect to continue to seek and receive feedback on the design from stakeholders and teachers through ongoing dialogue and in response to sharing the information to date with all teachers through Matatū.
8. Other options for setting fees and levies that have emerged as a result of this feedback have also been analysed and are included in this decision paper.
9. A proposed structure and content areas for the consultation document based on the whare model has also been prepared.

Proposed structure and content for the 2022 fees and levies consultation document

10. Teachers are amongst the most trusted groups of professionals in Aotearoa New Zealand. The responsibility of the Council is to safeguard and build on this - by safeguarding the mana of the profession as a whole.
11. The Council uses the whare metaphor as a way of describing our purpose and how this relates to teachers and the teaching profession.
12. The whare represents the whole teaching profession and so is a space and a place for every teacher, built on foundations agreed by the profession and widely accepted by society as being important for the wellbeing of all learners.
13. Using the whare structure and narrative to frame the Council's work allows us to illustrate what are the elements within the whare that provide strong and stable support and direction for the teaching profession.

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14. Integral to the strength and stability of the whare are the pou or pillars, representing each of the functions the Council is mandated to carry out.
 15. In this context, the level of fees and levies also form part of the supporting elements of the whare, by binding the parts together and allowing us to do the work of upholding the mana of each teacher and the whole teaching profession.
 16. Entering the whare places expectations on everyone to act in ways that reflect the values of the teaching profession, which are embedded into its structure – whakamana, manaakitanga, pono, whanaungatanga.
 17. The structure and content of the consultation document is critical because it is sharing the story of the work the Council is required to undertake on behalf of teachers and must reflect the values that shape the work and the organisation while at the same time giving the teaching profession the best opportunity to provide feedback on what is proposed.
 18. The whare model and metaphor is already used internally and externally by the Council and is familiar to and understood by many teachers and stakeholders. It is therefore likely to provide a meaningful and valuable way for teachers to connect with this particular issue.
 19. A proposed structure and content that uses this model and integrates the Council's values is outlined in the following table.



Proposed structure and content for consultation document

Working title	Content	Whare elements/values represented
Background	<p>The judicial review decision, including the need for legislative amendment.</p> <p>What teachers told the Council after the last consultation and in pre-consultation (stakeholders).</p> <p>What impact this has had on the approach to this consultation.</p>	<p>Manaakitanga</p> <p>Pono</p> <p>Whanaungatanga</p>
What we've done so far	<p>Pre-consultation with stakeholders to design the process and explore options.</p> <p>Discussion of the analysis of different scenarios for establishing level for fees/levies, analysis of options, impact of each option.</p> <p>Provide modelling and analysis for different options.</p>	<p>Reminder why each pou is needed for the whare.</p> <p>Whakamana</p> <p>Pono</p> <p>Whanaungatanga</p>
Value proposition	<p>In pre-consultation there was a strong message to incorporate a Te Ao Māori lens to the consultation process. The Teaching Council proposes to use the whare metaphor – the house – as it likens the profession to the metaphor of a whare, built by teachers, for teachers. The metaphor utilises pou/pillars to describe the functions of the profession that is vital to keep the whare/house safe, stable and long enduring. The pou/pillars hold and protect the mana of the teaching profession and all the work we do related to our functions, to support of the teaching profession – for example – the Code Ngā Tikanga Matatika and Standards Ngā Paerewa, ITE programme requirements, support of professional practice, and support for teachers when they experience problems in their professional practice.</p> <p>What is the value of a profession?</p> <p>What is the purpose of the Council?</p> <p>What the Council must do (mandatory functions). Emphasising that we must do all the functions (which form the pou or pillars of the house). If one is reduced or taken away the house may be destabilised or fall.</p>	<p>Describe the elements of each part of the whare.</p> <p>Whakamana</p> <p>Manaakitanga</p> <p>Pono</p> <p>Whanaungatanga</p>

What we are recommending as the level for fees and levies	Identifying viable options and the rationale for recommending these.	Whakamana Pono
Questions	Including – have we missed anything?	Whanaungatanga
Impact of increasing fees/levies	Acknowledge that any increase has an impact for teachers. Emphasise that we have also looked at ways to ameliorate the impact for individual teachers Set out the different actions that have been taken to do this and outcome of each (some may be presented as recommended options in the document).	Whakamana Manaakitanga Pono
Questions	Including – are there other ways of doing this?	Whanaungatanga
Summary/next steps	How we will consider the feedback received. How we will determine the final fees/levies (giving due consideration to the feedback and using the Treasury principles for analysis). How teachers will be informed about decisions. When new fees/levies will come into effect.	Whakamana Manaakitanga Pono

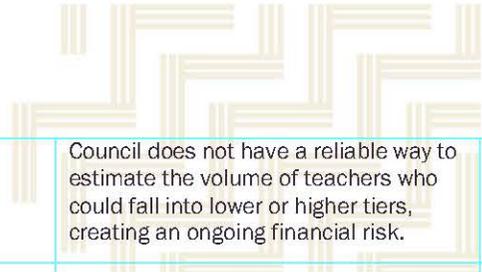
Analysis of proposals from stakeholder feedback

20. The proposals outlined below were those received from stakeholders which have policy/legislative and/or system implications.

Proposal	Pros	Cons	Other comments
Retaining current level of fees and levies	No increased financial impact on teachers.	The Council would need to reduce staffing levels and would be unable to carry out its mandatory functions to a service level equivalent to that provided to date. Negative impacts on all areas that the functions address for the teaching profession – for example – service	The Council has already reduced operating costs and found efficiencies, and it will likely be difficult to find more savings without significant adverse impact on service levels. The Council has also undertaken modelling and analysis to understand its ability to deliver mandatory

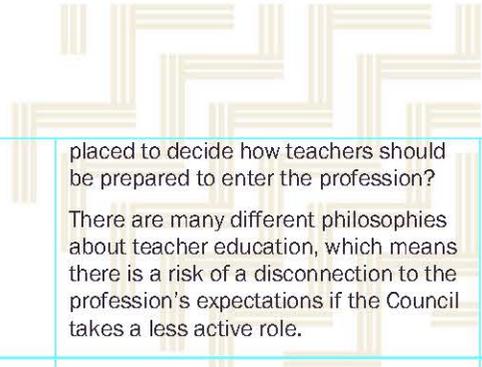


		<p>levels for applications for registration and practising certificates; service levels for conduct and competence issues; ability to approve and monitor requirements for Initial Teacher Education programmes.</p>	<p>functions such as registration and certification at an acceptable service performance standard without an increase to current fees.</p> <p>The analysis showed that the volume of incoming applications from teachers would exceed the capacity of a smaller Registration team to process them by between 50% to 65% per month and the average processing time would quickly exceed 12 months due to the resulting backlog.</p>
<p>Increasing fees and levies to meet actual and reasonable costs to deliver the Council's mandatory functions</p>	<p>The Council will be able to undertake all its mandatory functions to a service level equivalent to that provided to date and without comprising the integrity of its systems and processes.</p>	<p>Likely to be a significant increase from current levels for fees and levies.</p> <p>May be a significant financial impact for some groups of teachers.</p> <p>May impact on individual teacher decisions to enter/remain in the teaching profession.</p>	<p>Options to ameliorate the impact on teachers of any increase in fees and levies have been identified.</p>
<p>Adopting a tiered approach to fees and levies based on teacher salaries.</p>	<p>May partially address issues of economic equity (ability to pay), particularly for teachers in the early learning sector.</p>	<div data-bbox="1108 813 1500 965" style="background-color: black; width: 100%; height: 100%;"></div> <p>There may be equity and financial implications for groups of higher paid teachers who would be required to pay increased fees and levies to support lower fees and levies for lower paid colleagues.</p> <p>It is not known whether Council's current digital services platform could support a tiered approach to fees and levies in this manner, so this approach has technological capacity and timing risks if substantial changes are required.</p>	<p>Consider simpler ways to reduce the impact on those most likely to have lower salary and wages including those entering the workforce on a provisional practising certificate, and those with less than fulltime hours.</p>



		Council does not have a reliable way to estimate the volume of teachers who could fall into lower or higher tiers, creating an ongoing financial risk.	
Payment of fees/levies by instalments	Allows teachers to budget payment of fees/levies over a longer period.	Financial implications for the Council's budgeting are likely to be significant, depending on volume of uptake and frequency of payment. May be costly at a system level – likely to require significant re-building of Hapori Matatū.	Report on systems and financial viability of this option due prior to Christmas. Some simpler options like Buy Now Pay Later (BNPL) e.g. AfterPay may provide an option for some teachers.
Level of service provision – registration and practising certificate and LAT applications – current standard levels or an expedited option	An expedited service would allow a teacher or holder of a LAT to choose and pay for this should they have specific time limitations on their application.	Unlikely to significantly impact on overall costs for registration and certification, as the standard fee would be the actual cost for the service, other than it receives priority attention. Could impact on overall standard processing times, if a significant number of teachers chose an expedited option.	Hapori Matatū currently provides a significantly streamlined service which has been a service improvement that impacts positively for all teachers. Using the principle of simplicity this option, if proposed for consultation, would need to be either the current level of service for all teachers/holders of LATs or a lower level of service for all teachers.
How to attribute costs of conduct and discipline functions – retain current model – collectively funded and limited user pays	Recognises the interest all teachers have in there being a robust system for ensuring a high standard of teacher conduct. Promotes the overall interests of the profession by neutralising the impact of unmeritorious complaints which may affect some segments of the profession more than others.	Does not recognise that most teachers are never required to engage with the Council's conduct and discipline processes and the cost is significant.	Changes to legislation that will streamline conduct and discipline processes may mean that over time there will be fewer cases going to the Disciplinary Tribunal. Modelling is also being undertaken to explore the viability of no or a reduced disciplinary levy charge for some teachers based on salary. [REDACTED]

<p>How to attribute costs of conduct and discipline functions – full user pays</p>	<p>Recognises that most teachers are never required to engage with Council's conduct and discipline processes.</p>	<p>Does not recognise the interest all teachers have in there being a robust system for ensuring a high standard of teacher conduct.</p> <p>Places costs onto individual teachers who may also face employment consequences because of DT decisions.</p> <p>Where decisions are in favour of the teacher, costs would fall to the complainant or would need to be met by the Council.</p> <p>Costs can only be awarded for DT cases and the majority of cases are resolved prior to being referred to the DT, so even full user pays is only likely to fund a small proportion of total costs.</p>	<p>Not sufficient merit to take forward</p>
<p>How to attribute costs of conduct and discipline functions – full Government funding</p>	<p>Removes cost from individual teachers</p>	<p>Moves responsibility and oversight of teacher professional behaviour and practice away from the profession.</p> <p>Would be out of line of Government expectations of how other regulatory bodies fund professional behaviour functions.</p> <p>Unlikely that Government would agree to fund this function.</p>	<p>Government has made several clear statements about the need for the Council to operate with financial independence going forward.</p>
<p>How to attribute costs of ITE - retain current model – collectively funded and some user pays</p>	<p>Recognises the interest all teachers have in setting the standards for teacher education qualifications and providing a robust system for the education and training of new teachers.</p>	<p>Under s.479(1)(i) levies on teachers may include a contribution towards functions related to approval of ITE programmes. We know from our pre-consultation that some teachers were surprised they were contributing to initial teacher education. Some indicated that the Government should contribute to this cost. The issue is one of professional autonomy – who is best</p>	<p>Within the current model, there may be room to examine the activities that are being undertaken to determine if any can be reduced or ceased, or completed by other organisations (e.g. MOE)</p>



		<p>placed to decide how teachers should be prepared to enter the profession?</p> <p>There are many different philosophies about teacher education, which means there is a risk of a disconnection to the profession's expectations if the Council takes a less active role.</p>	
<p>How to attribute costs of ITE (other than direct costs of programme approval processes) -full user pays</p>	<p>Removes cost from current individual registered teachers.</p>	<p>Shifts costs to ITE providers making many programmes unviable, or to student teachers (who are also the future cohort of registered teachers).</p> <p>May impact on the attractiveness of teaching as a career option.</p> <p>Would be inconsistent with other professional accreditation and approval regimes for tertiary programmes.</p>	<p>Insufficient merit to pursue</p>
<p>Different timeframes for different practising certificate types</p>	<p>Some teachers would not need to renew their practising certificate three-yearly.</p>	<p>Limited cost savings per application, other than a small amount of administration costs, because costs for registration/certification are the actual amount to undertake this service.</p> <p>Unaffordable for the Council unless the gap could be funded.</p> <p>Would be costly at a system level – requires significant re-building of Hapori Matatū.</p>	<p>Would require gazetting to confirm the duration of each different practising certificate type.</p>



Other proposals

21. The proposals noted below have emerged from in-house discussions and are noted here for consideration.

Proposal	Pros	Cons	Other comments
<p>A retired teacher practising certificate that would enable ongoing contribution at a lower cost</p>	<p>Allows retiring teachers to remain connected to their profession.</p> <p>Could generate additional income</p>	<p>Would require analysis against legislation to determine viability and whether all the requirements for practising certificate issue and renewal (for example – satisfactory recent teaching) would need to be met.</p> <p>May have system implications and therefore costs implications for the Council.</p>	<p>Requires further discussion and analysis.</p>
<p>Increased level for late fee charge</p>	<p>Reinforces the importance and requirement to hold a current practising certificate.</p> <p>Ensures most teachers apply for practising certificate issue or renewal in a timely manner, minimising administrative resources being expended on follow-ups and requests for extensions.</p>	<p>May not act as a deterrent.</p>	<p>The late fee was increased from \$50.00 to \$100.00 when annualisation of practising certificates was implemented but was subsequently reverted following the Judicial Review decisions.</p>



Recommendations

22. Consultation on fees and levies will take place between Wednesday 16 February 2022 and Friday 01 April 2022.

Rationale – Feedback from stakeholders supported a consultation period outside of the summer holidays and that avoids the beginning of the school year. This period is two weeks longer than the 2020 consultation which commenced on 28 January 2020. This timeframe provides a longer period for feedback while also allowing analysis and decision-making to be undertaken in a timely manner, to meet a mid-year implementation goal. It reflects the **consultation** principle in the Treasury guidelines. It is possible that, as a result of feedback, the Governing Council may wish to reconsult on some aspects of the proposals. This timeframe does not include a contingency for this and the overall implementation goal may need to be amended should it be necessary to reconsult.

Agree / Disagree / Amend

23. Consultation on fees and levies will use the whole structure and narrative which will be integrated into the consultation document and form the basis of communications to teachers and stakeholders.

Rationale – This responds to the principles of **authority, transparency and accountability** outlined in the Treasury guidelines. It will assist in aligning the proposals in the consultation document with the Council's legislated functions and organisational values.

Agree / Disagree / Amend

24. Stakeholders will be given a summary of the decisions that the Governing Council has made on the design proposals for consultation and the rationale for each of these, after careful consideration of the pre-consultation feedback, ahead of the formal consultation commencing.

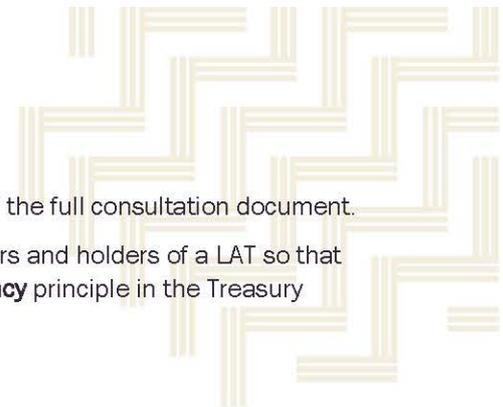
Rationale – This ensures the Council is adhering to the principles of **consultation** and **accountability** outlined in the Treasury guidelines. It aligns to the commitments made to stakeholders at the beginning of the pre-consultation work to seek their views and to clearly communicate decisions made because of these contributions.

Agree / Disagree / Amend

25. Registered teachers and holders of a Limited Authority to Teach (LAT) will be provided with a summary of the decisions that the Governing Council has made on the design proposals for consultation and the rationale for each of these, after careful consideration of the pre-consultation feedback, ahead of the formal consultation commencing.

Rationale - This ensures the Council is adhering to the principles of **transparency, consultation** and **accountability** outlined in the Treasury guidelines. It aligns to the commitments made to teachers, LAT holders and stakeholders to undertake an open and transparent process.

Agree / Disagree / Amend



26. All Registered teachers and holders of a LAT will be sent a copy of the full consultation document.

Rationale – This ensures full information is available to all teachers and holders of a LAT so that they can provide informed feedback. This aligns to the **transparency** principle in the Treasury guidelines.

Agree / Disagree / Amend

27. All stakeholders will be sent a copy of the full consultation document.

Rationale – This ensures full information is available to all stakeholders, so that they can provide informed feedback. This aligns to the **transparency** principle in the Treasury guidelines.

Agree / Disagree / Amend

28. The Teaching Council will disclose the outcome of the request made to the Minister of Education to provide up to \$3.0 million per annum in operating funding as a partial contribution to Council's mandatory functions to allow any increases in fees and levies for teachers to be introduced more moderately in 2022.

Rationale – This ensures full information is available to all teachers, so that they can provide informed feedback. This aligns to the **transparency, and accountability** principles in the Treasury guidelines.

Agree / Disagree / Amend

29. Consultation on fees and levies will include detailed information about actual and reasonable costs and the level of fees and levies required to undertake all the Council's mandated functions. This will include break-down of costs according to functions and modelling of options where appropriate.

Rationale – This ensures full information is available to all teachers and stakeholders, so that they can provide informed feedback. This aligns to the **transparency** principle in the Treasury guidelines.

Agree / Disagree / Amend

30. Subject to Deloitte providing confirmation that a cost recovery period of 3 years is reasonable, the estimate of the actual cost of resources required for the Teaching Council to deliver its mandatory functions in the period FY2022/23 through FY2025/26 should include an estimate of the impact of inflation.

Rationale – This ensures full information is available to all teachers, so that they can provide informed feedback. This aligns to the **transparency, and consultation** principles in the Treasury guidelines.

Agree / Disagree / Amend

31. Consultation on fees and levies will include an option for paying by instalment along with an indication of when this might be available in the future.



Rationale – This acknowledges the financial impact an increase in fees and levies has on individual teachers and provides a solution to enable the amount to be spread over a longer time period, while having less impact on Council budgets and systems.

Agree / Disagree / Amend

32. Consultation on fees and levies will include an option for a lower level of registration/certification service for teachers and relevant information in relation to quality and cost of the options available.

Rationale – Because this part of fees, costs and levies is an individual fee for each teacher, this provides an option for teachers to indicate their preference for the level of service to be provided, while having minimal impact on Council operations and finances. It aligns to the **simplicity, effectiveness, and equity** principles within the Treasury guidelines.

Agree / Disagree / Amend

33. Consultation on fees and levies will include an option for a lower level of service for applications for a LAT and relevant information in relation to quality and cost of the options available.

Rationale – Because this part of fees, costs and levies is an individual fee for each applicant, this provides an option for applicants to indicate their preference for the level of service to be provided, while having minimal impact on Council operations and finances. It aligns to the **simplicity, effectiveness, and equity** principles within the Treasury guidelines.

Agree / Disagree / Amend

34. Consultation on fees and levies will **NOT** seek feedback on whether the Council should retain the current level of fees and levies charged to teachers and holders of LATs.

Rationale – Financial modelling has determined the actual and reasonable costs for undertaking all the Council's mandated functions, which indicates that an increase is required to enable this work to continue and to maintain the current quality of service to teachers.

This option was considered under the **effectiveness, efficiency consultation and equity** principles of the Treasury guidelines.

Agree / Disagree / Amend

35. Consultation on fees and levies will **NOT** seek feedback on the desirability of a tiered approach to fees and levies based on teacher income.

Rationale - Whilst this option may address concerns about the ability to pay for some teachers, technical [REDACTED]. The ability for Council's online application system to support the implementation of a tiered approach to fees and levies is currently unknown, [REDACTED]

[REDACTED] Should substantial system changes be required to support such an approach, it will likely take 6-12 months to implement such changes.

Rationale - Financial impacts would be likely to be considerable, with a significant deficit building over a short time period. This would impact on the Council's ability to undertake its functions and consequently to provide necessary services to teachers. A delay in implementing new fees and

levies while any system changes were made would require the Council to use reserves to continue to fund the current operating deficit at an estimated rate of \$0.75 million per month. \$4.5 million to \$9.0 million.

This option was considered under **equity** and **transparency** principles of the Treasury guidelines.

Agree / Disagree / Amend

36. Consultation on fees and levies will **NOT** seek feedback on requiring a full user pays model for costs associated with disciplinary functions.

Rationale - A full user pays model does not recognise the interest all teachers have in there being a robust system for ensuring a high standard of teacher conduct. Instead, it places costs onto individual teachers who may also face employment consequences because of DT decisions.

Rationale - Where decisions are in favour of the teacher, costs would fall to the complainant or would need to be met by the Council, leaving an unknown additional financial impact on the Council's budgets.

This option was considered under the **equity** principle within the Treasury guidelines.

Agree / Disagree / Amend

37. Consultation on fees and levies will **NOT** seek feedback on proposals to seek further Government funding to meet the costs associated with the disciplinary function.

Rationale - The Government has clearly stated that its expectation is the Council is financially independent (other than leadership functions requiring government funding).

This option was considered under the **authority** principle within the Treasury guidelines.

Agree / Disagree / Amend

38. Consultation on fees and levies will **NOT** seek feedback on requiring a full user pays model for costs associated with the ITE function.

Rationale - The Act allows the Council to include in a levy on teachers some or all of the costs of approving ITE programmes. However, all teachers have a vested interest in the quality of the provision of Initial Teacher Education programmes. Shifting full costs to ITE providers means that ultimately student teachers (and therefore the future cohort of registered teachers) would bear these costs.

This option was considered under the **equity** principle within the Treasury guidelines.

Agree / Disagree / Amend

39. Consultation on fees and levies will **NOT** seek feedback on adopting different timeframes for different practising certificate types.

Rationale - This option would result in limited cost savings per application, other than a small amount of administration costs, because costs for registration/certification are the actual amount to undertake this service.

Rationale - The option would be costly at a system level –it would require significant re-building of Hapori Matatū.

This option was considered under the **simplicity**, and **effectiveness** principles within the Treasury guidelines.

Agree / Disagree / Amend





13 December 2021

Melanie Webber
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Matatū. Tū Mataora.
Stand tall. Shape the future.



Tēnā koe Melanie

Thank you for your letter to Angelique Stanton, of 22 November 2021, with PPTA comments on a recent stakeholder hui presentation about Teaching Council fees.

It is important to understand that the Governing Council has not yet made any decisions about fees and we are still working through the consultation process design with the Governing Council. The final shape of this will be informed by the feedback we have received from stakeholders during the pre-consultation hui.

Communication with individual stakeholders

In the interests of transparency, we have shared the collective feedback from the hui with all stakeholders, rather than responding individually to each organisation. This means all our stakeholders are able to get an overview of the themes that emerged, including where there are divergent views on particular issues.

Initial teacher education costs

Costs related to setting the requirements for Initial Teacher Education and the approval of ITE programmes were shared with our ITE Advisory Group on 26 November 2021. Anthony Neyland from PPTA attended. I have attached to this letter the relevant presentation slides, that show the activities related to our function to set the standards for ITE (which we call requirements) and our activity related to ITE programme approval, review and monitoring.

Only the direct costs of panels and Council staff's time related to panels including an overhead component are currently recovered from individual ITE providers.

Transparency of information relating to proposed fees and levies

Because consultation on the level for fees and levies has yet to take place, figures presented to date are based on current fees and our current actual costs associated with each function. The final amount for fees and levies will not be determined until the Governing Council makes a decision on the proposed fees and levies after considering feedback received following consultation with the teaching profession. However, we thought it was helpful to give visibility of the costs and fees charged by some other bodies with similar functions.

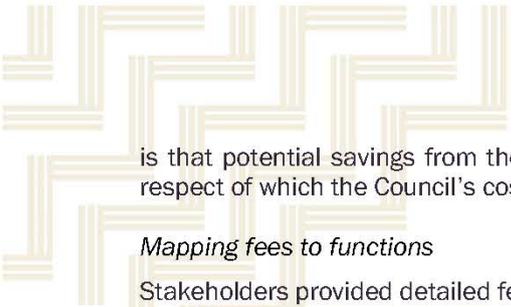
Staffing costs

The reduction in Teaching Council staff headcount was realised on the launch of Hapori Matatū which predated the fee consultation process in 2020. We are expecting the legislative changes to the disciplinary processes to come into effect in approximately 18 months' time. There will also be a transition process, yet to be designed, that will guide how cases already being considered will be treated. Our sense

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is that potential savings from the DT considering fewer cases will not be realised within the period in respect of which the Council's costs are assessed for the purposes of consulting on fees and levies.

Mapping fees to functions

Stakeholders provided detailed feedback on a range of considerations to inform options for determining and presenting the level of fees/levies. The information presented at the stakeholder hui was structured broadly by function. I reiterate that we have yet to decide on a new fee structure but am confident that we will be able to map our functions to fee components, as we have done in the past, so that teachers can see where we have or could make costs savings.

Design of the consultation process

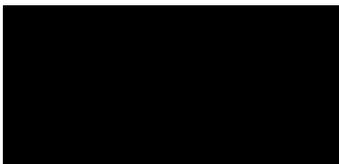
As we discussed at the stakeholder hui, we were seeking feedback on the design of our consultation process, within the broad timeline available to the Council. The proposal was a starting point for discussion, which was itself informed by listening to the concerns of teachers.

Explicit accountability through the changes in legislation

You have indicated your concern about teachers' ability to influence the level of fees, and for our consultation to enable them to indicate what they consider to be reasonable costs. We intend to use the feedback received from the hui to help us design a consultation process that enables this to occur. The Council will give this, and all feedback received through the consultation, due consideration. In addition, and as you are aware, Parliament has enacted changes to the Education and Training Act through the Teaching Council Fees and Levies Bill to provide certainty that the Council's fee-setting power is limited to recovering only the actual and reasonable costs incurred by the Council in performing its statutory functions.

Thank you for the opportunity to comment and I look forward to continuing to work with you on this important mahi.

Nāku noa, nā



Lesley Hoskin
Chief Executive

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