



5 May 2017

## **New Zealand Principals' Federation (NZPF) Submission on the**

### **PROPOSED CHANGES TO FEES**

### **To: the Education Council**

#### **Personal Details:**

Agency: New Zealand Principals' Federation (NZPF)  
Designation: National Executive  
Address: National Office, PO Box 25380, Wellington 6146

The New Zealand Principals' Federation (NZPF) is the largest professional organisation for lead educators representing the interests of 2,200 Principals of Primary, Intermediate, Area and Secondary Schools. Principals are from public, integrated and independent schools and are spread throughout New Zealand. NZPF aims to be the most influential advocate for school principals to enable high quality, well supported leadership for school learners in New Zealand.

We thank you for the opportunity to comment on the Code of Professional Responsibilities.

#### **General Comments**

NZPF welcomes the opportunity to submit comments on the proposed changes to teachers' fees and to comment on whether registration renewal should be more frequent.

We open our commentary by stating that NZPF does not support the view that the Education Council should set fees for education professionals who have no elected representation on the governance board of their own professional organisation.

As we have stated before the medical profession and the law profession along with all other professional bodies correctly elect their own representatives to their own regulatory professional organisations. It is our strongly held view that the Education Council is remiss in accepting a process that does not allow elected professionals on the Council. We do not accept the argument that the Minister has always signed off the membership of the Council and thus there is no difference. There is a difference. A proportion of the members that the Minister used to sign off or approve were elected by the profession. Now they are not.

Whilst this situation continues, it will be difficult to persuade any educational professionals to adopt ownership of their Education Council, and in particular to support paying increases in the fees requested by the governing board.

The Council has stated publicly that its role, amongst other matters, is to advocate in the best interests of the profession. We consider democratic representation on the governance Board critical and would like to see strong advocacy on this issue from the Council board.

We cannot attach the consultation submission form provided because the Survey Monkey platform has crashed. Below I will endeavour to replicate the questions and give you our views.

1. We STRONGLY DISAGREE with introducing a separate registration fee of \$85 because they are already paying provisional registration, have just graduated and for the most part are carrying heavy student debt.
2. The practising certificate should be paid every three years. To reduce that to one year would incur unnecessary administration costs for the Education Council.
3. We STRONGLY DISAGREE with changing the fee for issuing a practising certificate from \$220.80 every 3 years to \$170 every year. We recommend that both the fees and the term of issue remain at 3 years for \$220.80.
4. We STRONGLY DISAGREE with the increase in fee and reduction in issue time. See above.
5. We STRONGLY DISAGREE with changing the fee for teachers moving from provisional to full practising certificate from \$302.57 for 3 years to \$3270 for one year. There is no rationale to change the current arrangement which is \$303.57 for three years.
6. We STRONGLY DISAGREE that the fee for issuing teachers moving from provisional to full registration be changed from \$302.57 to \$610 for 3 years. See above.
7. We STRONGLY DISAGREE that the fee for issuing practising certificates to overseas and TTMRA teachers should change from \$302.57 for 3 years to \$270 for one year. Teachers from overseas are in many cases sorely needed in NZ schools to help in areas of teacher shortage and subject area shortages. Currently our relationship with Australia in terms of mutual recognition arrangements is volatile and changing by the minute so it is difficult to comment.
8. We STRONGLY DISAGREE with the notion of changing current practice and increasing the fee for issuing practice certificates to overseas and TTMRA teachers from \$302.57 to \$610 for three years. There is no justification for such a move.
9. We STRONGLY DISAGREE with increasing the fee for issuing a one-year LAT from \$56.22 to \$170 for one year. LAT teachers will generally be on the lowest salary scale and this move is unjustified.
10. We STRONGLY DISAGREE with increasing the LAT to two years for an increase to \$340. At the current rate, LAT fees for 2 years would be \$112.44. How can treble the fee be justified? We believe that is an outrageous increase.
11. We STRONGLY DISAGREE with trebling the LAT fee as described above. LAT teachers are highly valued in our schools and add a richness of learning opportunities for our young people that we might otherwise not be able to provide. LAT teachers should not be penalised for their contribution.
12. We AGREE that fees should be regularly reviewed as value is added to the certification process. We would suggest that an increase of CPI each year might be considered reasonable.
13. We STRONGLY DISAGREE with increasing the fee for lodging application for a practising certificate after an existing certificate has expired from \$50 to \$100. Expiry is not always the fault of the teacher but can occur through administration problems. It can also be the case that the profession is in urgent need of relief teachers and needs those in retirement to be certificated in haste. \$50 is quite sufficient.
14. We STRONGLY DISAGREE that discipline fees are conflated into certification fees. It is not a benefit to all teachers that some require to be disciplined!
15. NZPF believes that the Government should be funding any additional work it has given the

Education Council through its policy of mandatory reporting, for example. Teachers should not be facing increased fees for such activities.

Thank you again for the opportunity to comment on the matters of fees for EC.

Yours sincerely

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