

OFFICIAL RESPONSE to the consultation on

New registration categories for the Education Workforce Council 2024

November 2023

New registration categories for the Education Workforce Council 2024

Consultation response form

Your name:

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Responses should be returned by 21 November 2023 to:

Helen Scaife
Post-16 Workforce Development Branch
Education, Social Justice and Welsh Language Group
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and sent to:

email: EWCconsultation2024@gov.wales

Please tell us what you think.

Question 1 – Do you agree with the proposal that Further Education Institution Teachers will have to hold a minimum Level 5 teaching qualification to be able to work in the sector?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments

It is reasonable for those delivering Level 3 and Level 4 courses to hold a minimum Level 5 qualification in the subject they are teaching and for teachers to hold a Level 5 teaching qualification. However, for those working in some academic, vocational and technical education areas as tutors, then relevant subject qualifications may be more desirable. We would not wish to see subject-specific excellence and engagement with business and trade lost to the education sector for want of a qualification. For example, specialist music instrument tutors, engineers and crafts persons are ideally suited to the role of tutor, but would need to be supported by a teacher holding a Level 5 teaching qualification in this instance.

Question 2 – Do you agree with the proposed list of Level 5 (and above) teaching qualifications included within the draft Order (including equivalent qualifications across the UK and relevant historical qualifications)? If you consider any qualifications should be omitted or that any qualifications need to be added, please list these in the Supporting comments box and explain why.

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
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Supporting comments

The list of proposed Level 5 (and above) teaching qualifications included within the draft Order is a comprehensive list. However, there is an inherent danger when collating a list that it may not capture all of the current and historical teaching qualifications currently held by those practising. It also cannot possibly contain the future qualifications that may be developed. Therefore, this list will have to be revised on a regular basis to ensure that it remains up-to-date.

Question 3 – Do you agree with the proposal to add a registration category for practitioners of community-based adult learning?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
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Supporting comments

There is benefit in all those working in education being registered, and this includes those working in community-based adult learning. However, being registered and being required to pay to be registered are not the same thing.

Some tutors working in adult learning do so on a lower wage than would be applicable in schools, colleges and FE settings. A deduction of a mandatory charge in order to be registered simply to allow them to discharge their duties could risk some employees falling beneath the minimum wage, and some tutors even work voluntarily.

We would not want to see a reduction in the number of people engaging in adult learning in the community and recommend that the proposal carefully considers the membership rate to ensure that it is supportive of this type of work.

Question 4 – Do you agree with the definition of adult learning practitioner and community-based venue included in the legislations?

Definition:

Adult learning practitioner –

A person who provides further education and training to adults for a community-based adult learning provider.

Community-based Adult Learning Provider –

a provider (other than a school, further education institution or higher education institution) of further education and training for adults which is based in the community and funded or otherwise provided by a local authority, the Commission for Tertiary Education and Research, or the Welsh Ministers.

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments

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Question 5 – Do you agree with the proposal to require practitioners of community-based adult learning to hold a minimum Level 3 teaching qualification?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments

Those who undertake community learning do so because they understand the need to improve their knowledge and understanding or, perhaps because for some reason, they were unable to achieve as well as they hoped when in school. Practitioners of community-based adult learning do need to be properly trained to address this situation and should be trained to deliver the level they are required to teach.

As previously noted, some of those delivering courses may be qualified tutors in specialist areas with qualifications in their specialism but not be qualified teachers. These should not be discouraged by requiring Level 3 teaching qualification as a minimum. However, we would recommend aspiring to this minimum over a set period of time.

Question 6 – Do you agree with the proposed list of Level 3 (and above) teaching qualifications included within the draft Order (including equivalent qualifications across the UK and relevant historical qualifications)? If you consider any qualifications should be omitted or that any qualifications need to be added, please list these in the Supporting comments box and explain why.

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
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Supporting comments

As noted previously, whilst we cannot see any obvious omissions from the proposed list of teaching qualifications, there is an inherent danger when collating a list that it may not capture all of the current and historical teaching qualifications currently held by those practising, nor will it list the future qualifications that may be developed. Therefore, this list will have to be revised on a regular basis to ensure that it remains up-to-date.

Question 7 – Do you agree with the proposed requirement for all senior leaders and principals in FE Institutions to be registered?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments

As previously mentioned, it may not be necessary, or desirable, for all course tutors to have a recognised teaching qualification. It is reasonable for those delivering Level 3 and Level 4 courses to hold a minimum Level 5 qualification in the subject they delivering, but we would not wish to see subject-specific excellence and engagement with business and trade lost to the education sector for want of a qualification. We would recommend that tutors are supported by qualified teachers. These could be subject leaders or part of the senior leadership team.

Because those in leadership positions are overseeing educational delivery, will be undertaking quality control, and be ultimately responsible for attainment, it is reasonable for them to be registered with EWC.

Question 8 – Do you agree with the proposal that that volunteers or those providing training in relation to a profession on a temporary or occasional basis for a Further Education Institute are not required to register with the Council?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments

As previously noted, there is benefit in all those working in education being registered, and this includes those volunteering or providing training. However, we do agree that it may not be necessary, or desirable for all course tutors to have a recognised teaching qualification, and therefore it is understandable that they do not currently register with the EWC.

There may be scope for volunteers to be registered with EWC without payment of fees, but this is outside the scope of this consultation.

Some tutors working in adult learning do so on a lower wage than would be applicable in other settings. Therefore, a deduction of a mandatory registration fee in order to be allowed to discharge their duties could risk some employees falling beneath the minimum wage, and that is before we consider volunteers. There are already too few volunteers supporting learning, and we would not want to see a reduction in the number of people engaging – indeed they should be encouraged. Offering them appropriate membership to EWC in recognition of their contribution, but without fees, may need to be considered in the future.

Question 9 – Do you agree with the fee structure for the proposed new registration categories?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
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Supporting comments

As a membership organisation, it would be churlish of us to say that where an organisation incurs costs to discharge its functions it should not seek to recoup those costs. However, in order to make any fee palatable to teachers, they must clearly understand what benefit the organisation will bring to them.

With regards the EWC, the membership costs either £15 or £45 depending on of the status of the member, their income or the role they are qualified and registered under. But, regulation has not automatically led to improved conditions for employees, and contributors have expressed some concerns around value for money.

During its existence, the GTC for England was funded from central government through an annual payment made to each teacher which went directly from salaries to pay the membership fees. It was operated in such a way as to ensure the regulator remained at arm's length from the government, even though it was a directly funded quango.

What we would say is that any fee must be proportionate to the cost, and members will want to see benefits from their membership.

Question 10 – Do you think there are any further changes to the legislation associated with the proposed changes to the categories and qualification for registration with the Education Workforce Council (EWC) that should be considered?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
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Supporting comments

No, we do not think there are any further legislative changes necessary.

Question 11 - What, in your opinion, would be the likely effects of the new registration categories for the Education Workforce Council on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

- Do you think that there are opportunities to promote any positive effects?
- Do you think that there are opportunities to mitigate any adverse effects?

Supporting comments

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Question 12 – In your opinion, could the legislation on the new categories for registration be formulated or changed so as to:

- have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or
- mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

Supporting comments

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Question 13 – We have asked several specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

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Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

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