



March 2022

**New Zealand Principals' Federation (NZPF) Submission on
Teaching Council Fees Consultation
Closing Date 1 April 5pm
To: enquiries@teachingcouncil.nz**

Personal Details:

Agency: New Zealand Principals' Federation (NZPF)
Designation: National Executive
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The New Zealand Principals' Federation (NZPF) is the largest professional organisation for lead educators representing the interests of over 2,000 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.

General Comments

NZPF welcomes the opportunity to submit commentary on the proposed fees and levies increase to the Teaching Council (TC). We have sought the views of our own executive committee in constructing this commentary and have received feedback from 568 NZPF members who have divided views on the increases proposed.

We recognise that the TC has not imposed any fee increase in the past 12 years and that this has created a gap between resources and the TC's ability to meet its costs. That said, 47% do not see this as justification for increasing fees. We also recognise that the Government signalled two years ago that it will no longer be subsidising the TC to operate and altered legislation to allow the TC to recuperate its costs directly from teachers by imposing fees.

Further, we recognise that aside from the requirement for all teachers in Aotearoa New Zealand to be registered and have a practising certificate issued by the TC every three years, legislation dictates that the TC is also the body responsible for receiving complaints and managing disciplinary processes for teachers as required.

Background

NZPF recognises the importance for teachers and school principals to belong to their own professional body. In turn, they expect that body to be free of political interference and to have the autonomy to set their own registration and practising certificate fees and any agreed levies to pay for agreed support services. They also expect that as an autonomous body they have the right to critique Government policies and advocate in the best interests of teachers and principals.

NZPF further recognises that the Teaching Council, as the teachers' professional body, has received substantial funding from Government in the past. This arrangement can hinder the ability of the TC to operate autonomously and function as an advocate for teachers.

In the process of setting fees, we note that the TC engaged Deloitte to undertake a research study. The study verifies that the forecasted expenditure plan of the TC to carry out its future functions is reasonable. 52% of NZPF members do not however agree.

Feedback from Principals

Principals do not take responsibility for the TC failing to operate in a financially prudent way, in the past and do not see this as a reason to increase fees by 50%. By maintaining the same fee level for a twelve-year period, it was inevitable that sooner or later the TC would not be able to meet all its expenses.

Principals accept that teacher registration and certification is an international qualification from which they benefit. It is a requirement for applying for a teaching/principal position both in Aotearoa New Zealand and in many other countries of the world. Consequently, they agree that the full cost of registration should be the responsibility of each teacher/principal and 64% agree that the fee of \$128.96 should be paid in full every three years so that teachers/principals always maintain full registration.

Principals would not support an instalment payment system for teacher registration. You are either fully registered or not.

Principals would not accept different levels of registration fees for different levels of teachers. They view registration as being the same for every teacher whether a beginning teacher, a reliever, a LAT, an experienced teacher, a principal or an experienced principal. Arguments of affordability for beginning teachers and those on lower salary bands should be addressed through industrial channels not the TC.

Principals do not support the 100% increase for a late application for registration. There is no justification for the increase or evidence of increased costs for this process. NZPF recommends the fee remains at \$50, with 56% of the membership in agreement.

Principals are strongly opposed to the fee for practising certificate and levy being increased to \$472.21, with 75% opposed. This is less to do with the \$128.96 practising certificate and mostly to do with the levy of \$343. Irrespective of the extent of the levy, 53% agree that it should be payable by instalments over three years. The NZPF executive agrees that objection to the \$343 levy is in part because the TC has not been clear about the services the levy covers.

Principals are divided in their views about the establishment of a Leadership Centre by the TC with 38% in agreement and 38% opposed. The remaining 24% have no opinion. The NZPF executive is clear that if the TC does establish the leadership centre, any principal leadership initiatives must be designed and co-led by principals through a secondment process.

Principals appreciate the necessity of a levy contribution for mandatory functions such as complaints and disciplinary procedures. The current proposal is not transparent about what else is included in the levy which is a substantial amount (\$343). This is a likely reason for principals' reluctance to agree to the increase.

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Principals (80%) support the TC advocating for systemic employment protection for principals by promoting the establishment of employment protection officers. These employment officers would be available to support principals who find themselves in conflict with their Boards or parent community. Currently, there is no employment protection, advice or support offered to principals by Boards.

Registration fees should be set for a three-year period with CPI rather than inflation, added on renewal.

Thank you again for the opportunity to express the NZPF views on the fees setting process.

Ngā manaakitanga



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