

Consultation Document (2025)

SWRB Education Fees

He ara pūkenga, he ara tauwhiro, hei whakamana mātā waka

The many pathways of knowledge, the many pathways of social work, upholding the dignity of all

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1. Foreword

The social work education sector is in a period of significant change and transition. The SWRB is aware of the challenges that need to be navigated while maintaining our core regulatory responsibilities. This consultation seeks your views to inform decisions that the Board will make about ensuring sustainable, transparent, and equitable regulation that serves public safety while supporting sector confidence.

Our Regulatory Strategy 2024-2028 sets out our commitment to being a modern occupational regulator that is public safety focused, responsive, and intelligence-led. Central to this approach is ensuring our regulatory system works effectively for educators, students, employers and those who receive social work services, while being responsive to the needs of Māori as tangata whenua.

The context for this consultation

Education fees have remained unchanged since 2019, during which time we have developed new Education Standards that come into effect in January 2026. These standards, alongside our new Prescription and Monitoring Framework, represent a significant modernisation of how we regulate social work education.

As a Crown Entity, we adhere to guidelines from the Office of the Auditor General and Treasury on fee setting. These require our education activities to be fully funded by those who benefit from them, without cross-subsidising other regulatory functions. This creates an imperative to review our current fee structure.

What we are consulting on

This document presents a proposal for a fee structure that moves from our current approach to one that aligns with our new regulatory framework. Key elements of the proposal include moving from a student-number-based support fee to a flat fee structure and introducing specific fees for different regulatory activities.

We have developed this proposal based on detailed cost analysis and our commitment to regulatory efficiency. However, we recognise that any changes to fees have significant implications for the sector, and we are committed to genuinely considering all feedback before the Board makes its final decisions.

Our commitment to genuine consultation

We recognise the challenges facing social work education providers in the current environment. This consultation represents our commitment to meaningful engagement with the sector. We are offering multiple feedback channels, online hui, and detailed cost comparisons to support your understanding and input on the proposal.

Your feedback is critical to informing the Board's decision-making process. We want to understand the potential impacts of our proposals and explore whether there are alternative approaches that could achieve our regulatory objectives while better serving the sector's needs.

Your voice will shape the outcome

This consultation is about finding the right approach - one that maintains public safety through robust education standards while supporting a sustainable and thriving social work education sector and social worker workforce. The Board will carefully consider all feedback received before making final decisions about fee changes.

We encourage you to engage with this consultation and help us develop an approach that serves the profession, protects the public, and honours our commitment under te Tiriti o Waitangi.

2. The purpose of the consultation document

The Social Workers Registration Board (SWRB) is consulting on changes to the education fees charged to tertiary education organisations (TEOs) for the regulation of SWRB prescribed social work programmes in Aotearoa New Zealand.

3. Introduction

Our vision, purpose, and role

The SWRB is Aotearoa New Zealand's occupational regulator of the social work profession, established under the Social Workers Registration Act 2003 (the Act). In addition, we are the Lead Agency for workforce planning for all social workers. As a Crown Agent under the Crown Entities Act 2004, we are monitored by the Ministry of Social Development and accountable to the Minister for Social Development and Employment.

Our Vision:

Social workers in Aotearoa are accountable, recognised and valued.

Our Purpose:

Our purpose is to protect the safety of members of the public by ensuring social workers are competent and safe to practise and are accountable for the way in which they practise. We also enhance social workers' professional practice and provide insight into the opportunities and challenges facing the social worker workforce.

SWRB's role in setting standards for education

The Social Workers Registration Act 2003 (the Act) enables the SWRB to set standards for social work education in Aotearoa New Zealand. All social work tertiary education programmes in Aotearoa New Zealand must meet the SWRB Education Standards to deliver prescribed social work qualifications.

The Board uses Education Standards to ensure education providers deliver a social work degree at Level 7 or above that:

- delivers on the purpose of the Act
- reflects the content of the SWRB General Scope of Social Work Practice
- enables graduates to meet professional standards for entry into the social work profession such as the Code of Conduct, the SWRB Ten Core Competence Standards and fitness to practice requirements.

Relevant Legislation

- Section 99(1)(f) of the Act states that one of the functions of the Board is to "prescribe New Zealand educational qualifications for the purposes of this Act and monitor the provision and delivery of those qualifications".
- When prescribing qualifications, the Board must be guided by the following principle in Section 5B(2)(c): "The qualifications (in total) prescribed for a scope of practice must not impose undue costs on persons seeking to be registered as social workers or the public".

4. Why we're changing from Programme Recognition Standards to Education Standards

Prior to 2025, the SWRB applied Programme Recognition Standards for its regulatory activity. Through 2022-2025 these standards underwent review and have subsequently been replaced by the Education Standards, due to come into effect on 1 January 2026.

The Prescription and Monitoring Framework has been developed to provide transparency about the processes by which the SWRB will assess qualifications against the Education Standards. The proposed activity fees have been calculated to recover the expected costs for carrying out each process.

How new standards drive a new fee structure

The final version of the Education Standards was approved by the Board in May 2025. The Board also approved the Prescription and Monitoring Framework. The proposed education fee structure is designed to recover costs of the activities outlined in the Framework.

The fee model proposal includes changes to the fee structure from charging one activity fee (the programme recognition fee) and one support fee (the education programme annual fee) to charging fees that are specific to a range of prescription and monitoring activities. These activities are new qualification prescription, prescription confirmation, annual monitoring and custom monitoring. This is outlined in the Fees Proposal section below.

The SWRB is now undertaking public consultation on the proposed education fee model.

Timeline for implementing the new standards

The new Education Standards and the Prescription and Monitoring Framework will be fully operational at the beginning of 2026. The new fees are proposed to come into effect at the same time. This means that from January 2026 we will prescribe and monitor against the new Education Standards, not the previous Programme Recognition Standards

We are confident that the Education Standards alongside the Prescription and Monitoring Framework will provide flexibility for education providers to develop and deliver programmes which will contribute to public safety and provide benefits for both the profession and the public.

5. Education Fees

Our obligations for setting charges in the public sector

The SWRB is a Crown Entity and part of the state sector. This means we must apply current government policy settings under the Office of the Auditor General (OAG) and the Treasury guidelines for setting charges in the public sector (published in 2017). Under the guidelines, we can only charge for the work we are required to do under the Act at the level and standard expected by Government, with the costs recovered from the right person or group. We are also required to be financially sustainable without Crown funding.

We have applied these guidelines for the 2025 education fees review in the same way we did for the last review.

Under the Office of the Auditor General and Treasury guidelines, fees need to be reviewed regularly to ensure they remain appropriate, and the assumptions on which they are based (for example volume, demand and cost increases), remain valid and relevant. Both guidelines broadly instruct that fees should:

- be no more than the amount necessary to recover costs
- not be used to cross-subsidise other services or functions
- be based on the principles of authority, efficiency, and accountability.

The Board must always consider the requirement to abide by the Reserves policy.

NB It is unusual for the education fees to be consulted on separately as they would normally be part of a wider fees and levy review. However, education fees were not included in the last fees review due to the longer timeframe needed for the development of the Education Standards. We intend to bring education fees back into alignment with future fees reviews.

It is also important to note that all fees in the future may be subject to cost of living/inflationary (CPI) adjustments.

How cost recovery is implemented

The SWRB is committed to ensuring it operates an appropriate cost recovery framework. That means making sure we have the right approach for sustainable recovery of costs to meet our regulatory functions. This includes a proposal to allow for annual CPI adjustments, as well as changes to the education fees.

The work we have undertaken includes defining what we need to:

- deliver the functions of the Prescription and Monitoring Framework
- develop, implement and maintain the Framework
- support TEOs to meet their regulatory obligations
- pursue continuous improvement
- continue to meet OAG and Treasury guidelines.

Process for setting the education fees

The education fees are set by the Board under sections 108 and 5B(2)(c) of the Social Workers Registration Act 2003 and notified by a Gazette Notice. The current Education Notice 2022 is ongoing unless changed by the Board.

6. The Fees Proposal

The proposed fees have been developed in line with the new methodology outlined in the Prescription and Monitoring Framework. The new fee names are shown in Table 1. with the proposed fee amounts. The current fees are also provided for side-by-side comparison. Both GST exclusive and inclusive figures are provided for the purpose of consultation. When the fees are finalised, they will be published in the New Zealand Gazette as GST inclusive amounts.

The proposed fees have been calculated to ensure we have the minimum viable resources to meet our obligations as Aotearoa's regulator of social work education under the Social Workers Registration Act 2003.

Note that fees relate to qualifications, not to TEOs. For example, a TEO that delivers both a prescribed Bachelor's qualification and a prescribed Master's qualification will be charged the appropriate fees for prescription and monitoring of both qualifications. In addition, the new qualification fee is for when the Board first approves a new qualification. From that point it is confirmed every few years (usually every four years). These are not cumulative. Once a qualification is established, most TEOs can expect to pay the prescription confirmation fee every four years, plus the annual monitoring fee and annual programme support fee each year. Additional fees would only apply if specific issues arose that require custom monitoring.

Table 1: Comparison of SWRB's current and proposed education fee structure

	Current			Proposed		
Fee type	Fee name	GST excl.	GST incl.	Fee name*	GST excl.	GST incl.
Activity	Education	Up to	Up to	New qualification prescription fee (one off)*	Min – \$27,015 Max – \$40,655	Min - \$31,067 Max - \$46,753
fees (excludes some costs— see Table 2)	programme recognition vetting fee	\$26,000	\$29,900	Prescription confirmation fee (usually every 4 years)*	Min – \$27,015 Max – \$40,655	Min - \$31,067 Max - \$46,753
				Annual monitoring fee*	\$3,720	\$4,278
				Custom monitoring fee (as required)*	\$124 ph/pp	\$143 ph/pp
Support fee	Education programme annual fee	Up to \$9,000	Up to \$10,350	Annual programme support fee (see Table 3)	\$9,000	\$10,350

^{*}See following two sections for further detail about each of the proposed fees.

The purpose of the proposed activity fees

New qualification prescription fee – This fee is only payable once and is calculated to cover a 2-day visit. The minimum fee is based on a 3-person panel, and the maximum fee is based on a 6-person panel. The actual fee charged to a TEO will be determined by the number of panellists required to complete the assessment.

Prescription confirmation fee – This fee is calculated to cover a 2-day visit. Costs may vary within the stated range depending on the length of time required for the visit and the number of panel members required. The minimum fee is based on a 3-person panel and the maximum fee based on a 6-person panel.

When setting panels, the SWRB seeks to incur the lowest possible cost to the TEO while achieving robust assessment and ensuring regulatory compliance. This will be managed by seeking panel members with expertise in more than one of the required areas (te ao Māori, social work, tertiary education, regulatory, assessment and evaluation). If the prescription confirmation visit can be achieved in less than two days, the TEO will be charged for the actual time taken, which in some cases may be less than the minimum fee.

A prescribed programme will usually be due for prescription confirmation four years after the last prescription assessment. A shorter interval may be required in some circumstances. See the Prescription and Monitoring Framework for further information.

Annual monitoring fee – this fee covers the annual desk review of a TEOs annual electronic submission. In the year that prescription confirmation occurs, annual monitoring does not, so no annual monitoring fee will be charged in this year.

Custom monitoring fee – where a TEO's prescription status includes requirements, custom monitoring may be required to assess progress against the requirements. This is in addition to annual monitoring. Custom monitoring, as the name implies, is tailored to the needs of each situation. It is not possible to set a specific fee or even a fee range to cover custom monitoring. Therefore, we propose an hourly fee for each panellist required for a custom monitoring event.

NB: Previously the education programme recognition vetting fee was typically charged twice during a recognition cycle – once for a re-recognition visit and once for a mid-cycle review. Mid-cycle reviews have been replaced by annual and custom monitoring. Appendix A provides hypothetical examples that show the comparison between the current and proposed fees models over a four-year period. These examples are useful for demonstrating the expected timing of regulatory activities and when fees are likely to be due.

Table 2 details what is covered under each activity fee. It also specifies what is not covered by the fee. The proposed fees have been calculated to cover the costs of the activities listed.

Table 2. Further information on proposed prescription and monitoring fees (Activity Fees)

Proposed fee	What is covered by the fee	What is not covered
		by the fee
New qualification prescription fee	This fee relates to the first prescription of any new qualification as well as to existing qualifications which are being assessed due to significant change (as described in the Prescription and Monitoring Framework.) SWRB activities include: - desk review of application - requests for further information - constituting a prescription and monitoring panel - panel assessment (including hours spent on documentation review, site visit and matrix scoring) - report writing and review of provisional reports - other administration and communication relating to prescription	Travel related expenses including travel, meals and accommodation for panellists. The TEO is expected to pay directly for these.
D	- establishing monitoring plan.	Tuescal natatast
Prescription confirmation fee	This fee relates to the periodic comprehensive monitoring of a prescribed qualification to ensure it continues to meet the Education Standards. Desk review of prescription confirmation submission requests for further information constituting a prescription and monitoring panel panel assessment (including hours spent on documentation review, site visit and matrix scoring) report writing and review of provisional reports other administration and communication relating to prescription confirmation	Travel related expenses including travel, meals and accommodation for panellists. The TEO is expected to pay directly for these.
Annual	Desk review of annual submission	Visits to TEOs. Annual
monitoring fee	 Environmental scan Student survey Consideration of potential breaches of the standards to decide whether they meet the threshold to trigger custom monitoring 	monitoring does not include site visits.
Custom monitoring fee	 Assessment of relevant information (supplied by TEO and other sources) Virtual meetings Site visits 	Travel related expenses including travel, food and accommodation for
	Site visits	panellists. The TEO is expected to pay directly for these.

The purpose of the proposed annual programme support fee

The proposed annual programme support fee is paid by all TEOs annually to cover the cost of SWRB's functions attributable to education that are not covered by activity fees. Table 3. below provides more detail on the nature of the support activities.

Previously the support fee was called the education programme annual fee. This fee was apportioned based on bands of Equivalent Full-time Students (EFTS) – specifically graduating students. This formula meant TEOs were charged at different rates. However, the actual work undertaken to support programmes has no correlation with the number of students completing qualifications. The type and level of work required to support each TEO is approximately the same, regardless of the number of EFTS, therefore an equitable flat fee per TEO is now proposed. Appendix

B provides examples illustrating the difference between an EFTS-based fee to a flat fee for TEOs with different numbers of graduating EFTS in the previous academic year.

The proposed annual programme support fee is based on the current number of TEOs providing social work qualifications. If this changes significantly due to a national restructure of the Vocational Education and Training sector, this fee may need to be reviewed again.

The Board recognises the uncertainty many social work programmes are currently facing due to sector changes. The move to a flat fee will only impact social work programmes that usually graduate fewer than 20 EFTS per year. These TEOs will pay a higher annual support fee than previously. To minimise the impact on these smaller TEOs, the Board has proposed to **not** include a CPI adjustment to the annual programme support fee as part of this consultation but reserves the right to apply a CPI adjustment in future.

Table 3. Further information on the proposed annual programme support fee

Proposed support fee	What is covered by the support fee	What is not covered by the support fee
Annual programme support fee	 Providing advice to TEOs on general enquiries and specific matters including whether proposed programme changes are significant, guaranteed credit agreements, consideration of special circumstances relating to field education placements etc Liaison and relationship management with relevant stakeholders including TEOs, TEC, NZQA, CUAP, CSWEANZ Reviewing and operationalising the framework for the regulation of social work education Recruitment and training of prescription and monitoring panellists Indirect annual costs including management, legal and communication functions 	Anything covered by activity fees (Table 2.)

To give TEOs an idea of what the proposed fees might look like in practice over a four-year period, tables are provided in Appendix A. This compares the proposed fee with the current education fee model.

Taking inflation into account: 2019 to 2025

As mentioned above, no CPI adjustment has been added to the education fees since 2019. Table 4. shows what the fees would be today if the CPI adjustment had been applied annually. This information is provided to add context to the overall proposal.

Table 4: Current fees with and without CPI adjustment

Fee description	Gazetted amount	2025 amount if CPI
(currently on website)	(2019)	included
Education programme recognition vetting fee The fee applies to an education provider seeking SWRB recognition of an Aotearoa New Zealand education programme.	Up to \$29,900 (GST incl.)	Up to \$37,529 (GST incl.)
Education programme annual fee The fee applies to an education provider of a SWRB- recognised Aotearoa New Zealand qualification.	Up to \$10,350 (GST incl.)	Up to \$12,991 (GST incl.)

7. Consultation process

This consultation document sets out a proposal to change the fees charged by the Social Workers Registration Board (SWRB) for the regulation of social work education programmes. The proposed fees are structured to align with the new methodology for our regulatory activities relating to education outlined in the Prescription and Monitoring Framework. The proposed fees reflect the costs of implementing the new structure.

We are now seeking your feedback on the proposed fees.

We are sending this document to those who have engaged with the review of the Education Standards, as well as to those who are in decision-making roles within TEOs. The document will also be published online. We welcome feedback from the social work sector, especially those involved in teaching and managing programmes. Other stakeholders include professional bodies, monitors, employers and the wider social work sector.

Your feedback is critical to ensure we hear and consider sector views. This will enable the SWRB Board to make an informed decision about the proposed changes.

Consultation dates

The consultation will open on Wednesday 3 September and close at 5.00pm **Friday 17 October 2025**. *Please note that the consultation period has been extended from the originally published date of 22 September.*

How to provide feedback

To provide feedback you can either:

- complete the online feedback at <u>www.surveymonkey.com/r/SWRBEdFees2025</u> or
- 2. email a written submission to education@swrb.govt.nz

The consultation survey also seeks your views on what supports and safeguards you believe are needed to support TEOs through this transition.

Please provide your feedback before 5.00pm on Monday 22 September 2025. Submissions received after that date will not be considered.

The consultation process is supported by:

- online hui with an SWRB presentation and an opportunity for Q&A (see below for times and dates)
- Frequently Asked Questions (FAQs) on the SWRB website.

Question and Answer (Q&A) sessions

We are holding one online hui to share a short presentation about the fees proposal and give you the opportunity to ask any questions you may have. The presentation will be recorded and available on the SWRB website for those who are unable to attend the sessions.

The hui presentation time is:

• Thursday 4 September 11-12pm (presentation and Q&A) - Zoom link

Additional opportunities for Q&A will be held on:

- Monday 8 September 12-1pm (Q&A only)
- Wednesday 10 September 10-11am (Q&A only)
- Wednesday 24 September, from 12-1pm (Q&A only)
- Wednesday 1 October from 12-1pm (Q&A only)

These are drop-in hui and there is no need to attend the full hour if that doesn't work for you, so please come and go as necessary. Join us at the hui for more in-depth queries, examples and discussion.

Link to join the drop-in Zoom hui.

What happens after the consultation period ends?

The feedback you provide to the SWRB through the survey or by email will help the Board make an informed decision on the proposed changes. The feedback will be considered against the requirements of the Auditor General and Treasury and our Act.

When the Board decides on the new education fees, they will be published in the New Zealand Gazette. The gazetted education fees notice will confirm the dates that the changes will apply from. It is anticipated that changes will be in place for 2026 monitoring visits and prescription confirmations.

What happens if the proposed fee changes do not proceed as outlined in the proposal?

The current education fees have remained the same since 2019 with no CPI adjustment (see Table 1). With the implementation of the new Prescription and Monitoring Framework in 2026, it is inevitable that there will be some change to current fees.

Reviewing the fees means that the SWRB will still be able to meet all its obligations under the Act and ensure timely response and reporting timeframes within a more precise, flexible and transparent framework.

The proposal as it stands may still change following consultation, so your feedback is vital.

Future reviews

The education fees will be monitored and reviewed on a regular basis.

As we implement the new framework, the SWRB focus will include evaluation of our own processes. We are committed to continuous improvement, so aim to regulate effectively while seeking efficiencies in all our education processes, especially panel processes to keep costs as low as possible for TEOs.

Links to key documents:

- Social Workers Registration Act 2003
- SWRB Education Standards
- SWRB Prescription and Monitoring Framework
- Consultation FAQs
- Glossary and Definitions
- Feedback form

Appendix A.

Comparing costs to a hypothetical TEO over four years

The following models are hypothetical and have required several assumptions to enable the calculations. The assumptions need to be read ahead of the tables.

Current fees model (Table A1.)

Assumptions

- Annual fee calculated based on >20 EFTS graduated every year
- CPI adjustment has been applied to programme recognition vetting fee from Year 1 and will be applied to both fees from Year 2
- Maximum fee payable for Education programme recognition vetting fee
- Lower fee applicable for mid-cycle review
- All fees GST excl.

Table A1. Fees over four years under current model

	Education programme	Education programme	Education	Annual
	recognition vetting fee	recognition vetting	programme	total
	(programme re-recognition)	fee (mid-cycle review)	annual fee	
Year 1	\$32,500		\$9,000	\$41,500
Year 2			\$9,180	\$9,180
Year 3		\$20,000	\$9,364	\$29,364
Year 4			\$9,551	\$9,551
			Cycle total	\$89,595

Proposed fees model (Table A2.)

Assumptions

- CPI adjustment has been applied from Year 2
- TEO is compliant and requires no custom monitoring
- 3-person panel, 2-day visit for prescription confirmation
- All fees GST excl.
- Annual programme support fee charged at flat rate

Table A2. Fees over four years under proposed model

	Prescription	Annual	Annual	Annual
	confirmation	monitoring	programme	total
	fee	fee	support fee	
Year 1	\$27,015		\$9,000	\$36,015
Year 2		\$3,794	\$9,180	\$12,974
Year 3		\$3,870	\$9,364	\$13,234
Year 4		\$3,948	\$9,551	\$13,499
			Cycle total	\$75,722

As stated in the assumptions, the hypothetical example for the proposed fees model provides a view of the fees that may be applied to a TEO that is meeting all the Education Standards well. As stated in the assumptions, the hypothetical example for the proposed fees model provides a view of the fees that may be applied to a TEO that is meeting all the Education Standards. Custom monitoring will incur additional costs for a TEO where issues with meeting any of the Education Standards have been identified. If extra panellists or more time is required for a prescription confirmation visit, this will also incur additional cost.

Appendix B.

EFTS based fee/ flat fee: Hypothetical examples

Below are hypothetical examples illustrating the difference between an EFTs-based fee and a flat fee.

The current education programme annual fee is intended to fund SWRB's regulatory support function for education. To date it has been calculated according to numbers of equivalent full-time students (EFTS) graduating in the previous academic year. The fee has been capped at a maximum of \$10,350 GST incl. so the current fee shown for TEO B will be the same for any TEO with more graduating EFTS.

Table B1. GST excl. comparison

	Graduated EFTS	Current	Proposed flat fee
TEO A	≤10	\$5,217	\$9,000
TEO B	>20	\$9,000	\$9,000

Table B2. GST incl. comparison

	Graduated EFTS	Current	Proposed flat fee
TEO A	≤10	\$6,000	\$10,350
TEO B	>20	\$10,350	\$10,350