Introduction

The Department of Education, Employment and Workplace Relations (DEEWR) thanks the Australian Institute for Teaching and School Leadership (AITSL) for the opportunity to provide comments on the development and implementation of a national system for the accreditation of pre-service teacher education programs.

DEEWR strongly supports a national system of pre-service program accreditation for teacher education. Such a system will assist in promoting the delivery of quality programs as well as a national consistency to the capabilities and competencies of teacher graduates entering the profession. DEEWR commends the development of a rigorous approach to entry standards and improving processes throughout teacher education programs that ensure graduates achieve knowledge and skills of high standards. Research shows that teacher quality is the single greatest influence on student engagement and achievement.\(^1\)

Given the Australian Government’s commitment to regional areas, consideration should be given to the possible impact on both regional universities as well as young people from regional areas wanting to study in teacher training. Implementation of the standards may need to allow for sufficient lead time for any adjustments that need to be made. We would encourage AITSL to work collaboratively with regional universities and DEEWR to address issues that may arise.

The Government has on-going policy commitments to support Aboriginal and Torres Strait Islander students as well as improving understanding and respect for Aboriginal Torres Strait Islander cultures, histories and languages more generally. Acknowledgment of policies such as the ‘Closing-the-Gap’ policy and other supporting activities must remain in the Graduate Standards.


DEEWR feedback in response to the six consultation questions

1. Are the proposed principles for a national system for the accreditation of pre-service teacher education programs appropriate?

The Australian Government supports the principles noting that they underpin the education reform agenda to enhance teacher quality. The principles acknowledge the need for greater mobility of the Australian teacher workforce and allow for increased flexibility in pathways into teaching.

The principles of the accreditation processes of pre-service education programs need to include ongoing measurement and assessment of the impact of accreditation of courses on raising teacher quality.

2. In considering the inter-related nature of the proposed national graduate teacher standards and the program standards, what are your comments on critically important areas in the preparation of teachers that require further attention by these standards?

i) Teacher practicum:

The principles should ensure that practicum experiences provide a diversity of experiences including placements in rural/remote settings and experiences with Aboriginal and Torres Strait Islander students and students with disabilities and special needs.

Attention is also required to ensure that teachers are appropriately supported to be mentors and that the experiences are opportunities for professional development for both mentors and graduates. The partnership between universities and schools is key to ensuring there is productive matching of mentors and graduates.

The language of the principles should be inclusive to ensure that restrictive definitions do not exclude alternative teaching pathways into teaching.

ii) Entry criteria:

There is evidence that higher entry standards will lead to teachers who are able to achieve higher student outcomes. Raising the entry criteria, however, should not disadvantage rural or Aboriginal and Torres Strait Islander students. Consideration should be given so as to ensure appropriate support structures are in place. This could be addressed through a variety of mechanisms (for example, bridging courses, mentoring, and supplementary tuition in literacy/numeracy) and should be available to ensure that all students achieve the required high standards by the time they graduate. Additionally, students from non-English speaking backgrounds and those from culturally diverse backgrounds may also need to access support.

While strong entry scores for English and Mathematics are important for candidates entering education courses, investigation could be made of whether competency in literacy and numeracy is more effectively verified at the completion of the pre-service teacher education programs.
iii) **Specific program requirements:**

Pre-service teacher education programs should include mandatory units to prepare teachers to work in with children with disabilities (and special needs) in mainstream and/or special settings.

iv) **Other comments:**

- There seems to be little reference to the sort of professional or pedagogical studies that are appropriate or necessary to prepare teachers for the classroom. This could prove problematic but may be an item for the evaluation to test. More emphasis could be given to program content and delivery methods.
- Standard 1 needs to have a strong link with the Australian Qualifications Framework.
- Standards 2.1 and 5.3 should include wording to recognise special education and disability groups, as well as, families with children with disabilities.
- The reference in Standards 4 to program structure and content could include more information on discipline study requirements; the relationship between discipline studies and professional studies; and exemplification given of primary specialist requirements. This additional information could be included in supplementary materials.
- References should be made to the Australian Curriculum, Assessment and Reporting Authority (ACARA) and the Australian Curriculum to reflect the latter’s influence in program development and implementation. References to the Australian Curriculum should ensure that cross-curriculum priorities and general capabilities are covered.

3. **Please suggest areas in the proposed accreditation process that require further consideration and elaboration, and/or strengthening.**

Flexible approaches should be used to demonstrate how courses meet program standards, for example, video evidence could be used alternately to the evidence of in-person practicum. The aim, by avoiding a ‘tick-box’ process, is not to be perfunctory. Other systems, such as vocational education and training (VET), have different mechanisms to demonstrate program standards – these could be investigated and used as models to demonstrate outcomes. Universities should be encouraged to share ‘best practice’ examples of how courses are offered and the way they are taught and the infrastructure put in place to support this.

Care should be exercised not to impose a reporting burden that is not conducive to productive partnerships between universities and accreditation panels. To promote diversity of learning needs, AITSL should include experts (such as Aboriginal or Torres Strait Islanders, disability associations, subject associations) in the development and accreditation of programs and on assessment panels.

Documentation for accreditation assessment should include information that demonstrates how programs meet the needs for the implementation of the Australian Curriculum.
Comments on specific issues include:

**National Database:**

The consultation paper should have information on what will be included in the database (including workforce data) and from where it will be sourced, as soon as practicable. The data should be useful and be widely available to institutions; students/parents; teachers; and employers. The data needs to be dynamic and forward focused – what should be captured now for future use (in five to ten years). It will be important to ensure stakeholders have input into the content of the database.

Where possible existing institutional data could be used, however issues around data confidentiality, cost and access need to be addressed. Additionally, capacity to include exit surveys for longitudinal information, student satisfaction/experience in courses and workforce outcomes should be explored.

**AITSL Annual Report:**

The reports should include a range of qualitative and quantitative data related to pre-service teacher education programs and their accreditation.

**Quality assurance and continuous improvement:**

There is an opportunity for AITSL to lead research in accreditation of pre-service teacher education programs but the value of such research is for it to be shared with and used by universities. Strategies should be developed to address this.

Appropriate course content and supporting documentation on ways to support Aboriginal and Torres Strait Islander students should be made available for university reference. Additionally, research and supporting material should include material relating to the teacher workforce (for use in determining supply/demand issues).

4. Taking account of MCEECDYA’s decision for a distributed national approach for the accreditation of pre-service teacher education programs, please comment on the allocation, inclusiveness or suitability of the proposed roles and responsibilities.

It may prove helpful to ensure institutions have a specific role, such as, evaluation and ongoing feedback, in the process apart from participating in the accreditation process. Additionally, when considering partnership opportunities, it would be beneficial to include Indigenous Higher Education Advisory Council (IHEAC).

5. Are there any particularly significant matters that may require further consideration of the proposed implementation timeline?

More information on how the accreditation process will operate needs to be developed and made known (for example, will both new and existing courses be accredited?). Ongoing course evaluation is a positive aspect of the proposal.
6. What further comments or feedback can we make about the proposal?

The use of terminology must be consistent (for example are terms always appropriate, such as, preferred use of *Aboriginal and Torres Strait Islander* rather than *Indigenous*. While there is recognition of possible jurisdictional differences in terminology, inclusion of a glossary could address definitional issues.

Reference to National Curriculum and Australasian Teacher Regulatory Authorities (ATRA) should be included in Standard 2.1 to strengthen the link to the new Australian Curriculum.

While mention is made of evaluating the accreditation process, more details on this process including timeframes would strengthen the document. In particular, we encourage AITSL to give consideration to how outcomes will be measured (for example, case studies/longitudinal research).

The requirements MCEECDYA gave to AITSL for pre-service education courses (as listed on page 4) need to be explicitly reflected in the body of the document, and addressed in the global evaluation of the process.

**Conclusion**

The work of national pre-service teacher education program accreditation will give quality assurance to the Australian public regarding quality teaching, that is, there are processes in place to ensure high quality entrants participate in consistently high quality teacher education courses and programs producing high quality graduates.

The accreditation processes need to be consistent with the Australian Government's social inclusion policy agenda particularly in respect of students with disabilities and special education needs and Aboriginal and Torres Strait Islander students. Consideration of students and universities in regional/rural settings should also be addressed.

The consultation paper recognises the critical role that universities have in contributing to the teacher workforce and achieving enhanced student outcomes. However, this work should not be at the exclusion of new and alternate pathways to teaching which can enrich the Australian teaching workforce.

The Australian Government commends AITSL on the broad and comprehensive consultation on pre-service teacher education program accreditation.