



## Yvette Berry MLA Deputy Chief Minister

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Member for Ginninderra

Minister for Education and Early Childhood Development  
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Mr Chris Wardlaw  
Chair, Teacher Registration review  
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Dear Mr Wardlaw

Thank you for the invitation to respond to the national review of teacher education consultation paper and for extending the period for the submission of responses.

The ACT Government is confident that its model for teacher registration is continuing to meet its policy objectives of maintaining community confidence in the teaching profession and enhancing the status of the teaching profession through the continuous improvement of the quality of ACT teachers to meet the needs of all our students.

I am particularly interested in the review panel's advice on how best to bring Early Childhood teachers, and possibly other Early Childhood workers, into the framework used for teacher registration. I will be releasing the ACT Early Childhood Strategy in the second half of this year and introduction of a registration process will be of interest during subsequent consultation.

While the ACT teacher registration model has many features to recommend to the review panel, I draw your attention to our integration of professional learning, aligned to the teacher standards, into teacher registration. The Teacher Quality Institute, in collaboration with employers, has built a model to enhance teacher performance and development and meet registration requirements.

Further the review panel's advice on Royal Commission recommendations related to teachers and the possibility of moving teacher registration to an education workforce registration are of interest.

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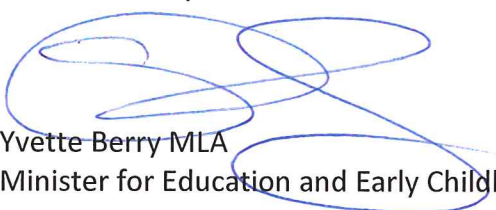
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For further information or clarification of points in the submission please contact Ms Anne Ellis, Chief Executive of the Teacher Quality Institute on 02 62075015 or [anne.ellis@act.gov.au](mailto:anne.ellis@act.gov.au). Ms Ellis and her team are very keen to support and work with the Review panel throughout the remainder of the review.

I wish you and the other members of the Review panel well in your deliberations and I look forward to receiving your report and recommendations later this year.

Yours sincerely



Yvette Berry MLA  
Minister for Education and Early Childhood Development

**16 MAY 2018**

**ACT submission to the Review panel for the National Review of Teacher Registration.**

**1. How is the national teacher registration framework working across Australia?**

***Elements of registration***

How well are the implementation and content of the eight elements of the Framework working? Please consider consistency, best practice and challenges and barriers in your response. You may wish to share examples.

The ACT Teacher Quality Institute Act was enacted in early 2011 to incorporate all elements of the national teacher registration framework. The ACT position is strongly that Teacher Registration in the ACT is working very well and that processes continue to meet a high level of consistency with the requirements expressed in the national teacher registration framework.

The ACT Government's intent of improving teacher quality in the ACT through the introduction of teacher registration at the beginning of 2011 is being realised through embedding the teacher standards in the full range of the ACT teacher regulatory framework. Also the integration of teacher registration processes and requirements with school and employment processes is a significant achievement.

The ACT is satisfied that the eight elements continue to adequately define teacher registration. Consistency is achieved through setting minimum standards/requirements for each element in the framework, although in the qualification element and the English language proficiency element the minimum requirement has become the national standard. In most of the other elements, there is variation across jurisdictions above the minimum requirement.

The elements where the ACT varies in implementation approach from the majority of teacher regulatory authorities are suitability to teach and discipline and de-registration (Regulatory sanctions). To avoid duplication, responsibility for 'fit and proper' assessments sit with Working with Vulnerable People registration and for investigations with employers. However the determination of the appropriate regulatory sanction sits with TQI. The ACT Government does not intend to vary its approach to sharing these responsibilities.

The areas of particular strength in the ACT approach are in the initial period of registration element and the fixed period of registration element. The process that has been developed in collaboration with schools and employers to support new teachers in the assessment of teaching proficiency for transition to full registration and the integration of this process with probation assessment is both rigorous and efficient in terms of time and cost. Details and artefacts were provided during the ACT consultations with the expert panel.

Under the fixed period of registration element, the ACT has developed a highly effective and efficient approach to assisting teachers meet the professional learning requirement for on-going teacher registration. Again details and artefacts were provided during the ACT consultations with the expert panel and is described in more detail in the next section.

The Mutual Recognition element is worthy of a close examination by the expert panel. This element is a key driver for consistency in the model as it facilitates the movement of registered teachers across jurisdictions. Consequently each jurisdiction relies on decisions made in other

	<p>jurisdictions in maintaining the integrity of the registration system. Changes to existing elements or the addition of new elements will need to be fully tested against this element to ensure that unintended consequences are not introduced.</p>
<p><b>Teacher quality</b>  How has the embedding of the Teacher Standards in the Framework supported teacher quality?  In particular, how have the Teacher Standards influenced the way in which teachers move from provisional to full registration and through renewal of registration?</p>	<p>The ACT invested previous National Partnership monies in building capacity in all ACT schools in understanding and working with the Australian Professional Standards for Teachers when these were first released. This investment has enabled ACT processes to align closely with the standards and to focus on improving teacher quality.</p> <p>This integrated approach is most evident in professional learning. TQI processes have been developed to ensure that the professional learning requirements for registration recognise professional learning that links directly to the standards. Professional learning programs that are accredited and are linked to the teacher standards are published on the TQI Teacher Portal and public website so that teachers are aware of the range of approved offerings. This helps casual teachers and teachers not currently working in schools locate and engage with professional learning to meet their needs.</p> <p>The TQI Teacher Portal in addition to supporting teachers by recording their professional learning, records teachers' reflections on their professional learning, which is a registration requirement. Teachers also submit program evaluations, which are available to providers as feedback and for program improvement. This is a major point of difference with other jurisdictions.</p> <p>The TQI Teacher Portal and the professional learning accreditation processes support the integration of the registration requirements with the employers' Teacher Performance and Development programs. Professional learning goals for systems, schooling sectors, schools and individual teachers can be entered into the portal and reported against for monitoring and improvement purposes.</p> <p>The ACT approach to the certification of teachers, while not part of the registration framework and is outside the scope of this review, is also noteworthy both in its level of rigor and the engagement of school based peers in the assessment process. The ACT despite its small size has a higher percentage of Highly Accomplished and Lead teachers compared to other jurisdictions. Highly Accomplished and Lead teacher status is acknowledged on the teacher's registration card, as is the status of accredited assessors.</p>
<p><b>Improvements</b>  How could current teacher registration arrangements be improved to strengthen both teacher registration implementation and teacher quality?  Are the eight elements of the 2011 Framework relevant and appropriate?  How could improvements be implemented, acknowledging different legislative, regulatory, administrative and resourcing contexts?  What are some expected</p>	<p>The eight elements of the framework continue to be relevant and appropriate, however there may be room to look at the current minimum requirements of some elements and the interaction between the elements.</p> <p>Compared to other countries, the professional learning requirements of 100 hours over five years, or twenty hours annually for jurisdictions with annual registration renewal, is low. In some countries the annual requirement is as high as forty hours. In the ACT, teachers generally record well in excess of the required 20 hours of professional learning annually.</p> <p>Also the four year tertiary qualification level has been the required standard in the ACT for over twenty years. Again perhaps there is scope to consider a gradual change to a Master level qualification rather than a time length of study as the minimum qualification level.</p>

benefits and success measures?	The interaction of the Mutual Recognition element with other elements in the current framework or in an improved framework could be problematic, particularly if an outcome of the review is to expand the range of approval categories or to introduce more elements or requirements to the framework.
<b>2. Should early childhood teachers be part of a national approach to teacher registration?</b>	
Should nationally consistent approaches to the registration of early childhood education teachers be considered?	<p>The ACT supports consideration of nationally consistent approaches to the registration of early childhood teachers. Later this year the ACT Government will release its Early Childhood Strategy. Following the release of the strategy, consultation with key stakeholders will explore the benefits of registration for early childhood teachers and possibly early childhood educators and other workers involved in the early childhood profession.</p> <p>This consultation will also include an evaluation of the models of registration to determine the model that best meets the needs of the early childhood workforce. Currently Victoria and NSW operate very different approaches to early childhood teacher registration.</p> <p>The considered advice of the expert panel on how best to progress registration for early childhood teachers will be helpful for future ACT work.</p>
How could a nationally consistent approach to teacher registration support and improve the quality of early childhood teaching in school and non-school settings?	Similar to the introduction of teacher registration serving to professionalise the school teaching workforce, the registration of early childhood teachers, and possibly other early childhood workers, will assist in professionalising this workforce. Professionalising early childhood, with the associated standards and codes of practices, supported by a well-developed registration process, with similar requirements as the national teacher registration framework and focussed on improving quality will be beneficial irrespective of the work location of the service.
How could the Teacher Standards be applied for early childhood teacher registration?	While some modifications or adjustments to language may be required. Early childhood teachers should be integrated into the teacher standards framework, by incorporating the Early Learning Framework.
<b>3. What role does teacher registration play for VET teachers in school settings?</b>	
Under current teacher registration processes, what are the specific challenges to delivery VET in schools for: a) registered teachers b) VET trainers and assessors How could these be overcome?	<p>Currently the ACT operates three approval categories for people seeking to work in schools – registered teacher, provisionally registered teacher and permit to teach. People seeking to work in the VET in schools area are accommodated in one of these three approval categories depending on qualification and experience.</p> <p>Challenges may exist with the requirements for registered teachers to maintain their professional learning and for VET trainers working with a permit to teach which does not necessarily provide a commitment to on-going work.</p> <p>Although it hasn't been raised as an issue by people working in the VET in schools area, there may be challenges meeting the combined specific industry related competency requirements and the TQI professional learning requirements. However, the current registration process does accommodate the on-going development needs of teacher</p>

	<p>psychologists within the professional development requirements for maintenance of registration.</p> <p>Consideration of additional specialised approval categories specific to VET in schools may assist with overcoming any challenges that may currently exist. A move to such specialised approval categories would require very careful consideration and legislative change.</p>
<p>Is greater flexibility needed to support schools to utilise skilled VET trainers and assessors? How can this be achieved without compromising teacher quality standards and national consistency in teacher registration?</p>	<p>The current framework has the flexibility to support schools in utilising skilled trainers and assessors. Most, if not all, teacher regulatory authorities use a permit to teach or similar approval category in meeting workforce needs when a registered teacher is not available.</p> <p>Depending on the level of feedback received on this matter, the expert panel could consider a more targeted and specialised authority to teach approval category in dealing with schools needs for such competencies/skills.</p> <p>A separate targeted and specialised authority would allow TRAs to develop different requirements, which may be more relevant to maintaining industry currency and skills competency, than those required for registered teachers to maintain teaching proficiency.</p> <p>As mentioned earlier careful consideration of Mutual Recognition requirements to avoid unintended consequences is necessary if considering an expansion to the range of approval categories.</p>
<p><b>4. How does teacher registration support entry into the teaching profession?</b></p>	
<p>How do current teacher registration processes support graduates:  a) seeking provisional registration  b) employed in different circumstances (e.g. casual, full-time or permanent)?</p>	<p>Access to provisional registration is relatively unhindered for the majority of new graduates. The ITE program accreditation process establishes meeting the graduate level of the teacher standards as a graduation requirement. Generally graduates from Australian universities should also meet the English language proficiency requirements.</p> <p>In the ACT, access to provisional registration is not contingent on being employed or employment type.</p> <p>Issues do, however, arise with a provisionally registered teacher's capacity to move to full registration. Provisional registration is nominally for a maximum period of five years, although this registration, like full registration must be renewed annually. This maximum period is designed to support new teachers who commence their career in casual or temporary employment meet the minimum work requirements for assessment against the Proficient level of the teacher standards.</p> <p>The reliance on one school year aligns with current probationary requirements in the ACT and is designed to allow/encourage employers to maximise the use of permanent employment for new graduates.</p> <p>ACT data shows that the overwhelming majority of ACT teachers successfully transition to full registration in the first school year. This high success rate is due to the alignment of the assessment teaching proficiency process with the probationary process, the supportive school based assessment process and the deep knowledge of the teacher standards that has been developed in ACT schools.</p> <p>A strength of the ACT approach is the support provided to casual and temporary teachers who are not able to meet the teaching requirement</p>

	<p>in the first year of teaching. In addition, to TQI support through regular workshops and development of process for evidence gathering across multiple work-sites, employers have developed flexible employment processes to maximise on-going employment opportunities and an increasing use of on-line professional learning modules.</p> <p>The ACT model was fully detailed during the ACT consultations and the expert panel has been provided with relevant artefacts.</p>
<p>Are there barriers/challenges presented by teacher registration for those entering the teaching profession? How could these be overcome?</p>	<p>Teacher registration itself does not present barriers to qualified people entering the profession. Most of the challenges are employment based and the remedy, if any exist, lie with employment legislation, policy and practice.</p> <p>The registration framework deliberately sets assessment at the proficient level of the teacher standards early in a teacher's career to align as close as possible with the probationary assessment period allowed under employment legislation. Strict adherence to the minimum two year assessment period originally envisaged for the teacher standards framework would have seriously exacerbated a reliance on temporary and casual employment until a teacher met full registration requirements.</p> <p>It is unlikely that employment legislation could be varied to allow for probationary periods to be modified while provisionally registered teachers transition to fully registered teachers.</p> <p>The ACT model of providing extensive support to all provisionally registered teachers, as outlined during the consultation process, is recommended for expert panel consideration.</p>
<p>How could the pre-registration of initial teacher education students support entry to the profession? What would be the benefits and implications of such an approach?</p>	<p>The ACT is progressing the development of a Professional Experience register which, when fully implemented, will include all initial education students engaged in professional experience in an ACT school. While this approach is not directly a pre-registration, it commences the induction to the profession process early in the student teacher's career.</p> <p>Inclusion on the register will introduce the student teacher to TQI and the teacher registration process, and provides access to the TQI portal. TQI will also be able to monitor the transition from student teacher to provisionally registered teacher more supportively.</p> <p>Student teachers in the ACT are able to seek a permit to teach once all professional experience requirements have been successfully completed (approximately ten weeks prior to graduation). This enables many student teachers to gain further practical experience, with payment, prior to completion of their ITE program.</p>

**5. How can we ensure that registered teachers satisfy the fit and proper person requirement?**

<p>How do regulatory authorities (within legislated responsibility) ensure the fit and proper person requirement of registered teachers?</p>	<p>The suitability element of the framework is one of the elements that would benefit from a close examination by the expert panel and advice on how this element can be further improved. This is not to suggest that there are inherent problems with how TRAs currently work with this element, however given the increased attention that the Royal Commission recommendations will bring to the judgement of fit and proper, it is timely to be attentive to how things are working and what improvement can be made.</p> <p>An initial observation is that there is some variation across jurisdictions about exactly what fit and proper means and what should be included in an assessment of fit and proper. Is fit and proper the same as suitability to teach? Is past performance as a teacher included? Should the teacher's medical fitness, particularly mental illness history, be a consideration? How are spent convictions managed?</p> <p>The ACT contends that the expert panel should limit its attention to achieving a national consistent definition of fit and proper which may include suitability to teach or vice versa. If a single definition is not appropriate, a consistent definition of both, directly related to the profession of teaching, would suffice.</p> <p>There is little to be gained in focussing on where each jurisdiction locates its decision making assessment of fit and proper or how these decisions feed into the registration process. The development of common language and common understanding is a worthwhile goal for the review.</p> <p>The expert panel's attention is drawn to the <i>Fit and Proper Person Requirements 2011</i> of the <i>National Vocational Education and Training Regulator Act 2011</i> as an example of an existing model for fit and proper.</p>
<p>How can teacher registration processes support a nationally consistent approach to satisfying the fit and proper person requirement of registered teachers, at the point of registration and throughout their teaching career?</p>	<p>As outlined above, the development of nationally consistent language and a nationally consistent definition or definitions would be beneficial to the registration process. There may be a need to align definitions to points in the registration process, particularly if an assessment of medical fitness is included.</p> <p>Also some guidance on the balance in decision making between regulators and employers especially for registered teachers would be beneficial.</p> <p>The expert panel could investigate, and provide advice to Ministers on, the possible development of a national teacher register to support the implementation of Royal Commission recommendations related to fit and proper assessments, information sharing and management of the mobility of teachers.</p>



## 6. Other matters raised during ACT consultation forums

During the consultation forums the following matters were raised for the Review panel to consider and, if appropriate, to address in its report.

- Flexibility, possibly in the form of additional approval categories with reduced registration requirements, to accommodate teachers transitioning from the workforce through casual employment and teachers who are on long term leave, including forms of family leave.
- Ensuring consistency of arrangements for teachers working across jurisdictions, mainly casual teachers, in the payment of registration fees and the portability of professional learning.
- Building capacity into professional learning requirements to respond to national priorities. For example, STEM.
- Filling the gap in the teacher standards between the Proficient level and the Highly Accomplished to align with improving teacher quality.
- The use of the principal standard rather than the proficient level of the teacher standards for the on-going registration of school leaders.
- Ensuring processes support the movement of teachers across the nation.