



27 April 2018

Mr Chris Wardlaw PSM
Chair, Expert Panel,
National Review of Teacher Registration
PO Box 299
Collins Street West
Melbourne VIC 8007

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Dear Mr Wardlaw,

National Review of Teacher Registration

The Association of Heads of Independent Schools of Australia (AHISA) welcomes the opportunity to contribute to the National Review of Teacher Registration (the Review).

Given the short time-frame for submissions, we have not had sufficient time to survey our membership to inform this paper. We note, however, that a survey of principals and teachers will form part of the Review consultation process. Our submission therefore highlights key points that have been put forward from our membership in previous consultations that have touched on issues relating to teacher registration, including the Royal Commission into Institutional Responses to Child Sexual Abuse.

We would welcome any inquiries you may have about this submission. These may be addressed to AHISA's Chief Executive Officer, Ms Beth Blackwood, telephone (02) 6247 7300, email ceo@ahisa.edu.au.

Yours faithfully,

Dr Mark Merry

AHISA National Chair
Principal of Yarra Valley Grammar, Victoria

KEY POINTS

- The teacher registration process, together with ITE program accreditation and other regulatory measures such as the Literacy and Numeracy Test for Initial Teacher Education (LANTITE) can be understood as a system of interdependent regulatory checks and balances for entry to the teaching profession.
- While the regulatory environment of teaching as a profession encourages teaching quality to flourish and, by offering professional recognition, helps increase the status of the profession, it cannot replace the development that emerges from within the profession.
- Any proposals for further regulatory measures linked to teacher registration must be carefully considered for their impact on teacher and school autonomy and other expressions of professional agency.
- Casualisation of the teacher workforce and the increasing number of teachers seeking part-time employment to achieve greater work-life balance are workforce management issues that have a countervailing effect on the intent of teacher registration to regulate teaching quality.
- Regulated professional development for registration purposes is a challenge for staff and school leaders in regional, remote and very remote schools and can have indirect effects on the staffing of schools in these areas.
- A national system to train in-school teacher-mentors could have a significant positive impact on teaching quality by assisting teachers at critical points in their career pathways.
- AHISA supports recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse regarding recording and sharing information recorded on teacher registers which relates to child protection.
- Completion of a national online child protection training course could be a condition of ITE students entering schools on practicum and a requirement of teacher registration at Graduate level.
- Any consideration of pre-registration must also consider if there are alternative, low-cost and non-regulatory means by which ITE students can be encouraged in early engagement in the profession.
- AHISA recommends that AITSL develop consultation papers describing various options for expanding the teacher registration process to cover VET and early childhood teachers and for proposals relating to pre-registration.

ABOUT AHISA

AHISA Ltd is a professional association for Heads of independent schools.

The primary object of AHISA is to optimise the opportunity for the education and welfare of Australia's young people through the maintenance of collegiality and high standards of professional practice and conduct amongst its members.

AHISA's 430 members lead schools that collectively account for over 430,000 students, representing 11.5 per cent of total Australian school enrolments and 20 per cent of Australia's total Year 12 enrolments. One in every five Australian Year 12 students gains part of their education at an AHISA member's school.

AHISA's members lead a collective workforce of over 40,000 teaching staff and some 25,000 support staff.

The socio-economic profile of AHISA members' schools is diverse. Over 20 per cent of our members lead schools serving low- to very low-SES communities.

AHISA believes that a high quality schooling system in Australia depends on:

- Parents having the freedom to exercise their rights and responsibilities in regard to the education of their children
- Students and their families having the freedom to choose among diverse schooling options
- Schools having the autonomy to exercise educational leadership as they respond to the emerging needs of their communities in a rapidly changing society.

TEACHER REGISTRATION AND ITS IMPACT ON TEACHING QUALITY AND TEACHER WORKFORCE MANAGEMENT

Regulation as a lever for teaching quality

Teacher registration regimes across Australia are now linked to the Australian Professional Standards for Teachers, bringing greater national consistency to registration practices and greater transparency to what teachers are expected to know and do. However, the power of the registration process to leverage gains in teaching quality depends on the career stage of teachers and other factors such as the workforce management practices of systems and individual schools.

The impact of teacher registration on teaching quality is arguably strongest in the early stages of teachers' careers. While registration acts as a 'gatekeeping' process for entrants to the profession – first at graduate or provisional level, and then at proficient or full registration level, its most direct influence is on initial teacher education (ITE) programs, which then in turn shape the knowledge and skills of ITE graduates.

Successive 'gatekeeping' points occur throughout a teacher's career as teachers seek to maintain their registration at the proficient level, typically at five-year intervals, with continued registration dependent on the amount and type of professional development undertaken in the prior years. (The potential impact of certification at Highly Accomplished and Lead levels at later career stages is not a focus of this Review.)

Accreditation of ITE programs and the development and application of accreditation standards and procedures for ITE programs have served to strengthen the gatekeeper role of teacher registration and its impact on the knowledge and skills of those seeking to enter the profession. Introduction of the Literacy and Numeracy Test for Initial Teacher Education (LANTITE) is a further example of using regulation to strengthen the registration process.

ITE program accreditation, the LANTITE and graduate teacher registration can therefore be understood as a system of interdependent regulatory checks and balances for entry to the profession. AHISA acknowledges that this system provides governments, the community and employers with a level of assurance as to the capabilities of beginning teachers and assists systems and schools in managing their teacher workforce.

The requirement that teachers undertake a set minimum number of hours of professional learning and the move to recognise professional learning only if undertaken through accredited programs are further regulatory measures that aim to control teaching quality and even define it.

AHISA recognises that the regulatory environment of teaching as a profession encourages teaching quality to flourish and, by offering professional recognition, helps increase the status of the profession. However it cannot replace the development that emerges from within the profession.

Teaching is a collegial profession. Much of the invaluable professional exchange among teachers and therefore the learning that can have the most immediate impact on classroom

practice and student learning does not necessarily occur within accredited professional development programs. Subject teacher professional associations and more recent initiatives such as TeachMeets and social media-based professional learning networks exist outside the regulatory environment and even in spite of it.

A downside of increased regulation in professional development has therefore been to increase the cost of professional development to teachers and schools in terms of both time and money. Teachers, with or without the support of principals and the financial support of their school, continue to pursue their professional learning of choice over and above the professional learning required through accredited professional development programs. Similarly, to progress their school's unique improvement agenda, principals may find they have to introduce tailored professional learning programs that are not accredited by their state or territory registration body and therefore will not count toward individuals' professional development requirements for re-registration.

This suggests there is a risk that regulatory solutions to the issue of improving teaching quality can have the unintended consequence of undermining teacher autonomy and professional agency.

Deficit-model thinking about schools currently dominates public debate on Australia's education system and policy discourse, with blaming of teachers or schools – and even students and parents – a typical response to so-called 'failing' schools. AHISA has argued elsewhere¹ that not only is transformation of Australian schooling underway, it is profession-led. We hope therefore that the Review will consider the extent and degree to which it is possible and advisable to regulate teaching quality before recommending further regulation around the teacher registration process.

Any proposals for further regulatory measures linked to registration must be carefully considered for their impact on teacher and school autonomy and other expressions of professional agency.

Teacher workforce management

Two workforce management issues that act as countervailing pressures to the intent of the registration process are casualisation of the teacher workforce and the increasing number of teachers seeking part-time employment to achieve greater work-life balance.

As noted in the Review consultation paper (page 12) and elsewhere², it is now common for beginning teachers to be employed on a casual or fixed-term basis, as a casual relief teacher or as a contract teacher. Among other issues, casualisation has negative impacts on teachers' professional learning and their registration, in terms of their induction experience, access to mentoring, opportunities to progress from graduate to proficient level, and then maintaining registration.

Similar issues emerge when teachers themselves seek part-time employment to manage home demands such as caring for young children or ageing parents or other work-life balance issues, or to address physical and mental health issues.³ Participation in professional learning to achieve re-registration can be problematic for part-time teachers.

Access to appropriate professional development is also an issue for teachers in regional, remote and very remote schools. Jurisdictional differences pertaining to accredited professional development programs can exacerbate this problem, especially where schools are close to state and territory borders or where transport options can make interstate travel more affordable than intrastate travel.

Professional development for teachers in regional, remote and very remote areas is a challenge to school budgets: a half-day or one-day professional development program out of area may entail a teacher being three days away from school, with coverage of classes and lack of relief staff representing an additional challenge and cost burden.

AHISA's submission to the Independent Review into Regional, Rural and Remote Education (IRRRRE)⁴ presents results of a survey of members leading schools in regional, remote and very remote areas. The survey revealed that online course delivery is seen as an important means of overcoming time and cost challenges in providing professional development for teachers in independent schools in regional, remote and very remote areas.

A key recommendation of the IRRRRE⁵ is to 'improve the availability, accessibility and affordability of ICT' for schools, teachers, students, parents and communities in regional, rural and remote areas. It is AHISA's view that addressing this recommendation is far more likely to have a positive influence on teaching quality in regional, remote and very remote schools than increased regulation of professional development.

Other strategies adopted by AHISA members' schools to overcome challenges to provide teacher professional development in regional, remote and very remote areas include:

- Partnering with other schools to create collegial teacher professional exchanges, including short-term placements
- Teacher exchanges
- Offering time release for postgraduate studies
- Linking with ITE providers.

Surveys of members conducted for the IRRRRE also revealed that greater national promotion of and therefore more interest in HALT certification meant that the quality of professional development opportunities offered by schools were important not only to support teaching quality but also in recruiting and retaining staff. That is, the Review should be aware that registration and/or certification processes can have indirect effects on staffing of schools in regional, remote and very remote areas.

Regulations governing registration and professional development can work against the profession if workforce management practices or the increasing trend for teachers to seek part-time employment do not or cannot support the conditions for teachers to meet registration requirements. Professional development of teachers in regional, remote and very remote areas also presents challenges for teachers and schools. These factors need to be considered in formulating any further regulation of teacher registration requirements.

TEACHER REGISTRATION AND THE ROLE OF SCHOOLS

Teacher induction & mentoring

As noted in the Review consultation paper, 'Induction is a shared responsibility across the profession, with initial teacher educators, systems, sectors and regulatory authorities, educational leaders, teachers and graduates each playing an important role' (page 12). Even prior to the entry of ITE graduates into the workforce, schools have a significant role in ITE and pre-service teachers' introduction to the profession through practicum placements.

In 2015 AITSL managed a project involving responses from the four national principals' associations on issues arising from the Teacher Education Ministerial Advisory Group (TEMAG) review of ITE. On behalf of the associations, the Catholic Secondary Principals Australia (CaSPA) was tasked with preparing a paper examining teacher induction; AHISA was tasked with preparing a paper on school-based practical experience for ITE students.

In its paper, CaSPA addressed the issue of whether induction should be understood as a process of enculturation or as 'a phase of learning program to support the development of a graduate teacher'. The paper notes that how school systems and school leaders interpret induction influences the induction processes offered to graduates:

The quality of these programs varies considerably; some are just administrative introductions while others are years-long partnership programs. When induction is narrowly defined as short-term support to help teachers survive their first year on the job, its role in fostering quality teaching and learning is diminished. (CaSPA, page 6)

The CaSPA paper also canvasses the issue of mentoring of graduates as part of the induction process:

A national model to provide a consistent approach to mentoring of graduates would be welcomed. This might include a role, which places the teacher-mentor in the liaison role with school experience pre-service placements, as well as working with first and second year graduates. (CaSPA, page 9)

In its paper for the 2015 TEMAG project, AHISA discussed the issue of mentoring at some length. Points made included:

- School-based mentors are the most appropriate model for maximising the effectiveness of school-based practical experience for a range of programs (such as clinical teacher education programs) and for particular stages of student teacher learning.
- Mentoring of pre-service teachers signals a greater commitment of time and expertise to pre-service teachers on the part of schools and teachers than supervision, and demands specialist training for the mentor.
- The selection, training and support of mentor-teachers demand a considerable commitment of time and financial resources.
- Selection of mentors should recognise that mentors need to be outstanding adult educators, not just outstanding child and adolescent educators.

- The success of school-based teacher education through a mentoring model will depend on adequate resourcing.

AHISA's paper noted that a system of trained mentors in schools also has the potential to support alternative pathways into teaching, for example for career-change professionals, including practitioners in the visual and performing arts or from VET-related industries, and for those in targeted areas of teacher shortage, including native speakers of languages other than English, or with a background in physics and chemistry or higher level mathematics.

Not only does mentoring help pre-service teachers to integrate their course work and theory with classroom practice, it greatly assists graduate teachers to gain confidence in the classroom, meet the Professional Standards and achieve registration at Proficient level. In interviews conducted in preparation for the TEMAG project paper, AHISA members reported that mentoring and/or observation and feedback are considered successful models for professional development of teachers at all stages in their careers.

That is, a national teacher-mentor training scheme could have a significant impact on teaching quality by assisting all teachers at critical points in their career pathways.

The success of school-based teacher education through a mentoring model will depend on commitment to adequate resourcing. AHISA therefore advocates the development of a federally funded national mentorship scheme that would:

- a) Cover the cost of training teachers as in-school mentors of pre-service teachers on practicum placement and of beginning teachers and to assist the professional development of experienced teachers
- b) Cover the cost of time release from other duties for teacher-mentors to work with preservice and beginning teachers.

ISSUES ARISING FROM THE ROYAL COMMISSION INTO INSTITUTIONAL RESPONSES TO CHILD SEXUAL ABUSE

Between 2015 and 2017 AHISA made five submissions to the Royal Commission into Institutional Responses to Child Sexual Abuse ('the Royal Commission'). AHISA's submission of 14 August 2015⁶, in response to the Royal Commission's *Issues Paper 9: Addressing the risk of child sexual abuse in primary and secondary schools*, was informed by a survey of members on a range of issues. Pertinent to this Review are factors identified by principals as militating against child safe schools that were outside their authority, including:

- Lack of communication between external authorities and agencies, especially between jurisdictions, puts students and schools at risk. Some Heads identified the lack of automatic flow-on of crucial information about reported incidents to interstate police forces and regulatory bodies as 'the greatest danger to our children' and a risk to schools. One example given was where the Director of Public Prosecutions in one state, having decided against prosecution due to lack of evidence, was not obliged to forward notice of the complaint to other jurisdictions, leaving children vulnerable if abusers moved interstate. A national system of reporting or at least a national register of complaints was recommended by AHISA members to address this issue.
- Delays in action from police, regulatory agencies and public prosecutors can sometimes extend to months, leaving school communities 'in limbo' once a report or inquiry has been made.
- The complex staffing profile of independent schools, which will generally comprise full- and part-time teaching staff, teacher support staff, staff delivering the co-curriculum, staff who may be located at remote campuses (such as outdoor education facilities), out of school hours care staff, boarding or residential staff, administrative staff and maintenance and grounds staff. Casual relief staff and pre-service teachers on practicum placements add to the challenge of ensuring all staff are aware of and meeting school policies and protocols. Schools may also have a large volunteer force, working across the curriculum and co-curriculum and events.
- There is a disparity in training options and resources available across the jurisdictions. For example, some state and territory departments make training materials available to non-government schools; others do not. Further, some Heads noted the lack of face to face training available in regional areas. Independent schools with systemic or other group affiliations are more likely to have access to policy and protocol templates and tailored training options.

There was agreement from over 70 per cent of those responding to the AHISA survey that free-to-access national online staff training modules on child protection, featuring a component that allowed completion of each module to be verified, would be of assistance to principals:

- Such a resource would provide both valuable training materials for schools, and an external check on the level of awareness of staff. For example, principals could stipulate completion of certain modules as a condition of initial or ongoing employment of permanent or casual staff, and beginning teachers could be required to complete

modules as part of their accreditation to either 'Graduate' or 'Proficient' status against the Australian Professional Standards for Teachers. In this way, along with Working With Children Checks, completion of training modules could help build a 'child safe passport' for those working in schools.

- Some members noted that online training modules would help address the issue of fluidity of staff, especially in relation to casual relief staff, and for the induction of new staff. Modules common to all jurisdictions and which all teachers and non-teaching staff could access would create not only a common language and understanding among staff within schools but across schools, and create a firm foundation on which staff knowledge could be regularly updated or refreshed. It was noted that many pre-service teachers on practicum placement demonstrated difficulty in fully grasping the notion of duty of care, and that an online course should incorporate all the building blocks that formed a comprehensive understanding of a child safe environment.
- Some members noted that while online training courses had value, they were not in themselves sufficient to address schools' professional learning needs. As one member expressed it:

The shared experience of sessions with presenters and community conversations (amongst staff) are critical. Online methods are isolated and might meet compliance requirements but they do not feed community conversations about safe environments and appropriate conduct by staff, students and parents.

Given the tenor of members' responses to the 2015 survey, AHISA endorses recommendations⁷ of the Royal Commission relating to teacher registration (Recommendations 8.9, 8.10 and 8.11) for:

- Nationally consistent state and territory legislative requirements about the types of information recorded on teacher registers, including the teacher's former names and aliases, details of former and current employers and details of allegations or incidents of child sexual abuse
- Nationally consistent provisions in state and territory teacher registration laws providing that teacher registration authorities may, and/or must on request, make information on teacher registers available to teacher registration authorities in other states and territories and teachers' employers.

AHISA also endorses Recommendation 8.12, that consideration be given to what safeguards are necessary to protect teachers' personal information.

The Royal Commission further recommends (Recommendation 13.8) that consideration be given to strengthening teacher registration requirements to better protect children from sexual abuse in schools and to a review of minimum national requirements for assessing the suitability of teachers.

The Royal Commission's own research⁸ highlights the difficulty of identifying by interview those who may pose a risk to children. While AHISA supports the recommendation that minimum national requirements for assessing the suitability of teachers be reviewed, AHISA is

of the view that making child protection education a required component of ITE and teacher registration at Graduate level would be a relatively faster means to support schools to adhere to the Royal Commission's recommended Child Safe Standards, particularly Standards 5 and 7, and Principle 7 of the National Statement of Principles for Child Safe Organisations as currently drafted by the Australian Human Rights Commission for the Council of Australian Governments.⁹

Standard 5 of the Royal Commission's Child Safe Standards includes the proviso that 'All staff and volunteers receive an appropriate induction and are aware of their child safety responsibilities, including reporting obligations'; Standard 7 includes the provisos that 'Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training' and that 'Relevant staff and volunteers receive training on the nature and indicators of child maltreatment, particularly institutional child sexual abuse'.

The draft Principle 7 for Child Safe Organisations reads: 'Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training'.

AHISA supports recommendations of the Royal Commission regarding recording and sharing information recorded on teacher registers that relate to child protection. Further, AHISA recommends that, just as ITE graduates are required to demonstrate their literacy and numeracy proficiency by passing the LANTITE, completion of a national online child protection training course could be a condition of ITE students entering schools on practicum and a requirement of teacher registration at Graduate level.

EXPANDING THE REGISTRATION PROCESS

Early childhood and VET

AHISA gives in principle support to the registration of early childhood teachers and to the registration of vocational education and training (VET) teachers in school settings as part of a national approach to teacher registration.

Some 75 per cent of AHISA members' schools have an early learning centre and many independent schools are also Registered Training Organisations for the delivery of VET programs. AHISA therefore recommends that AITSL develop a consultation paper describing various options or proposals for expanding the registration process to cover early childhood and VET teachers. The consultation paper should indicate how it is expected the proposals would be managed and their likely impact so that it is clear to schools how any proposed changes might affect – either positively or negatively – current staffing arrangements, especially in rural, remote and very remote schools or in schools serving Indigenous students, students with disability or students with high level needs.

Pre-registration

Again, AHISA recommends that AITSL develop a consultation paper setting out options detailing how a pre-registration scheme would be managed and its likely impact on pre-service and beginning teachers.

It has been pointed out¹⁰ that, given the high percentage of ITE graduates who pass LANTITE, the rationale for asking students to pay for a test that most will pass is questionable. Similarly, the rationale for pre-registration must be considered carefully if students – many of whom, as already noted, will only gain entry to the profession on a casual basis – will be asked to bear the cost for something from which it may be difficult to reap significant benefit.

Any consideration of pre-registration must therefore also consider if there are alternative, low-cost and non-regulatory means by which ITE students can be encouraged in early engagement in the profession. ■

NOTES

- ¹ See for example AHISA's response to the 2030 Innovation Strategic Plan issues paper, 30 May 2017, available at <https://www.ahisa.edu.au/AHISA/Advocacy/Submissions/AHISA/Advocacy/Submissions.aspx?hkey=043c92ca-d66a-4bfd-93b4-ec8ca77d8925>.
- ² Mercieca B (2017) What are we doing to our early career teachers? The issue of the casualisation of the teaching workforce. *Australian Educational Leader*, 39(1).
- ³ Pfeiffer T (2017) Staff welfare: A critical management issue for independent school leaders. *Independence*, 42(1):32-35. Available at <http://independence.realviewdigital.com/?iid=152804#folio=36>.
- ⁴ AHISA's submission to the IRRRE is available at <https://submissions.education.gov.au/Forms/IRRRE/Documents/Association-of-Heads-of-Independent-Schools-of-Australia.pdf>.
- ⁵ The final report of the IRRRE is available at <https://docs.education.gov.au/node/50281>.
- ⁶ AHISA's submissions to the Royal Commission are posted at <https://www.ahisa.edu.au/AHISA/Advocacy/Submissions/AHISA/Advocacy/Submissions.aspx?hkey=043c92ca-d66a-4bfd-93b4-ec8ca77d8925>.
- ⁷ The Royal Commission's final recommendations are available at <https://www.childabuseroyalcommission.gov.au/recommendations>.
- ⁸ South S, Shlonsky A & Mildon R (2014) *Scoping review: Evaluations of pre-employment screening practices for child-related work that aim to prevent child sexual abuse*. Available at https://www.childabuseroyalcommission.gov.au/sites/default/files/file-list/research_report_-_evaluations_of_pre-employment_screening_practices_and_supplementary_materials_-_prevention.pdf.
- ⁹ The National Statement of Principles for Child Safe Organisations (Consultation Draft) is available at <https://www.humanrights.gov.au/national-principles-child-safe-organisations>.
- ¹⁰ Barnes M & Cross R (2018) Why we need to review how we test for teacher quality. *The Conversation*, 23 April 2018. Available at <https://theconversation.com/why-we-need-to-review-how-we-test-for-teacher-quality-95074>.