



## Submission to the *National Review of Teacher Registration*

(May 2018)

### **About APPA**

The Australian Primary Principals Association (APPA) is the national professional association for primary school principals in Australia, representing over 7200 principals from affiliated Government, Catholic and Independent primary schools in every state and territory.

APPA's advocacy is founded on:

- Every child attending a school with high-performing leaders and quality staff;
- Initiatives, actions and projects that are research informed and encourage contemporary professional learning and growth; and,
- The knowledge that primary schools provide all Australian children with the opportunity to acquire the necessary foundational academic, social and emotional skills to lead full and rewarding lives.

Australia's future is dependent upon an educated population that is responsive to a changing world and the challenges it brings.

### **The Context of Primary Schools**

APPA supports a strong focus on quality primary school education whereby there is an alliance between societal goals of building connections with, and contributing to, the wider community through family, work and citizenship, and the educational opportunities, intellectual growth and sense of wellbeing experienced by the individual. The Productivity Commission (2012) stated that,

*Australia's future depends on how well it develops the 'human capital' of its population. A well-performing schooling system is fundamental. It benefits individuals, the functioning and cohesion of society and the performance of the economy.*

Teachers and school leaders are part of the 'human capital' committed to the task of educating children in all domains of learning – cognitive, affective and psychomotor.

APPA's Charter on Primary Schooling states:

*Primary schools teach our children and contribute to our nation's future. They embrace the responsibility of giving children the academic and social foundations for leading fulfilled and enriched lives. In our school communities, each child's identity and culture are celebrated; personal responsibility is encouraged and expected; and, the knowledge and skills are gained to become independent and lifelong learners.*

The above statement intentionally linked teaching children with building the *nation's* future. School leaders and teachers do not differentiate the teaching of children based on state and territory borders, school enrolment boundaries or school sector. It is not uncommon for a child to enter a classroom having arrived from a nearby school, interstate or overseas. For the teacher, it is the child's needs rather than origin that determines the learning plan for that child.

Our Federation, coming as it does with certain advantages also brings with it a number of complications. For schools, and for teachers moving across state and territory boundaries, the complications of teacher registration are considerable and unnecessary at a time when we have national arrangements around teaching and principal standards, an Australian Curriculum and national testing. In saying this, there is

recognition that states and territories have particular responsibilities in regards to industrial relations and employment agreements.

### **General Comments on Teacher Registration**

As part of APPA's collection of views from practising primary principals across Australia, the association developed a simple online survey and asked sector state and territory association executives to complete.

There were 75 responses with each state/territory represented to differing levels. APPA's National Advisory Council also contributed comments.

Briefly...

1. For the statement: ***"Teacher registration worked effectively"***
  - a. Near 60% of respondents agreed.
  - b. Just under a quarter disagreed.
  - c. 20% neither agreed nor disagreed.
  
2. For the statement: ***"Teacher registration processes build teacher quality"***
  - a. Over 40% agreed with the statement.
  - b. Almost 40% disagreed.
  - c. Near 20% neither agreed nor disagreed.
  
3. For the statement: ***"Teacher registration processes drive ongoing improvement and professional development of teachers"***
  - a. Just on 35% agreed with the statement.
  - b. 40% disagreed.
  - c. 25% neither agreed nor disagreed.
  
4. For the statement: ***"Teacher registration supports those entering the teaching profession"***
  - a. Just over 50% agreed with the statement.
  - b. Just over 30% disagreed.
  - c. Near 20% neither agreed nor disagreed.

While the above figures cannot be regarded as part of a comprehensive, high level survey they do point to issues that should be brought to the attention of the Review. APPA sought comments from respondents in relation to the 'experiences of teacher registration' for six teaching cohorts. These cohorts were:

- Teachers with full registration
- Casual teachers
- Beginning teachers
- Teachers moving from interstate
- Teachers returning from long-term leave
- Overseas teachers
- Early childhood educators

### **Support for Teacher Registration**

Before covering the issues experienced, the survey gave good feedback on the general need for, and management of, teacher registration.

The following points to the overall value of a teacher registration scheme.

- Teacher registration is a process accepted by the teaching profession as necessary in ensuring every teacher in a classroom is qualified and has met requirements around professional learning, working with children, recency of teaching practice and registration renewal.
- For many, the process is relatively straightforward and provides an opportunity to build a portfolio and 'switch on' to professional practice.

- For beginning teachers, registration, while time-consuming, works best when a colleague with the knowledge and time works with and guides them through the steps.
- Registration is a time when teachers focus upon a professional requirement and the set expectations that enable them to continue in, and value, their profession.

Overall, there is wide support for registration given its role in ensuring that ‘fit and proper’ persons are employed as teachers in schools. However, registration should not simply be an administrative task or compliance measure. It should involve efficient and practical steps that lead teachers on a path where individual skills are built and the profession strengthened.

### **Teachers with full registration**

Certainly, the issue of ‘bureaucratic overload’ was one raised often as was the situation where many teachers fail to see the relevance of the process. It should be pointed out that an issue in one jurisdiction may not be an issue in another.

Particular issues raised:

1. Registration is a time-consuming and complex exercise that is frequently seen as a process of compliance and ‘box ticking’ where teachers do what they have to do to ‘complete the process’ not because they see any particular benefit in it.
2. Teachers have little say within the registration process or with the registration body as to what’s important. It takes teachers away from the ‘core business’ of planning and implementing quality teaching and learning programs.
3. Timing of registration, including the need to remind staff registration is due. Part-time teachers can miss the requirements while missing a pay date can result in unwarranted penalty.
4. The required fee is often seen in terms of keeping the people that manage the process employed. The registration body can also be seen as disconnected to ‘on the ground’ teachers and not having a realistic view of the pressures and demands placed upon them.
5. The registration body does not support or promote the profession through offering or conducting any professional learning. With principals being responsible for quality teaching and learning, the point is made that professional learning should be a ‘natural part of each school’s program’. There may also be times when, during the registration process, a teacher struggles to talk to a person with an understanding of the issues involved.
6. Access to the mandatory hours of professional learning can be difficult in rural and remote areas.
7. The matter of principals ‘signing off’ from provisional to full registration places additional demands on the individual principal particularly where there are teacher competency questions. The focus can become one of getting teachers ‘over the line’ rather than one of professional growth.

Other points raised:

1. The aim of lifting the status of teachers in the eyes of the community through teacher registration is yet to be realised.
2. The registration renewal process adds to a principal’s workload given the requirement to sign off on professional learning.
3. Registration may be rewarding those who are good at paperwork rather than those who are great practitioners.
4. Professional learning reflection requirements are constructed for compliance reasons rather than to identify personal and professional growth.

### **Casual Teachers**

There are several issues impacting on casual teachers in completing registration requirements. The issue most raised was that of getting the professional learning hours needed to meet registration requirements. This is particularly so when the casual teacher doesn’t have a ‘base’ school to access accredited professional learning or the opportunities to meet the required hours.

Comments from principals provided good insights into the situation facing casual teachers:

1. Difficulty of teachers that do not have a 'base' school to engage in ongoing professional learning activities to gain the necessary hours or receive quality feedback on their teaching and classroom practice.
2. The cost of ongoing professional learning is exacerbated by the situation of casual teachers undertaking a recognised activity when not paid for the day/s yet having to meet the cost of attending. Cost can be in the range of \$250 - \$500/day.
3. Schools cannot function effectively without well supported casual teachers who have a good knowledge of systems. Unless a teacher has a fixed term contract or is securely embedded into the culture and staff community of a specific school, there is practically no opportunity to upgrade and consolidate skills let alone meet registration requirements in a realistic way.
4. The introduction of teacher registration has lessened the pool of available casuals for many schools. The requirements of registration have been a disincentive for many, and the number of experienced – sometimes post-retirement – teachers has diminished. As a result, many ideal candidates have explored other work or fully retiring rather than remaining in the profession in a casual capacity. Casual teachers that only wish to work one or two days a week at a small number of schools are dropping out of the process because of the difficulty of attaining 20 hours of professional learning per year.
5. Specific to the Northern Territory is that many travelling teachers do not register to become casual teachers because of the time and cost involved. This has resulted in a dramatic shortage of relief teachers in the territory.

### **Beginning teachers**

Beginning teachers enter schools requiring plenty of support and guidance. In many situations, they are provided with mentors; at times financially supported by the system. Principals highlight the need to ensure every beginning teacher is appropriately inducted into the profession and provided with the ongoing support necessary to become a good teacher rather than simply meet the requirements of teacher registration.

Concerns were expressed around:

- the quality of teacher education courses, notably courses provided online;
- the amount and quality of practical experience they have received during their course; and,
- the challenge of developing beginning teachers who arrive without the necessary literacy and numeracy skills.

Respondents questioned the value of registration in developing good teacher practice and highlighted the following.

1. The difficulty a beginning teacher has in focusing on anything more than their essential work – student engagement and classroom management, lesson planning and curriculum delivery, student assessment and reporting, etc.
2. Where professional learning becomes a matter of compliance, it is questionable as to whether the learning will always meet the specific needs of the beginning teacher nor at the level that will build skills.
3. Beginning teachers are still developing organisational skills and often overwhelmed with paperwork. The process of compiling 'evidence folder' for teacher registration acts as a distraction when beginning teachers are at the most important stage of their emerging career. The process needs to be simplified, shortened and designed so that it is more constructive and supportive in nature.
4. Mentoring of beginning teachers should be a priority in each school. Beginning teachers should be:
  - a. Working collaboratively with an experienced teacher which proves to be of greater benefit than attending courses and jumping through teacher registration hoops.
  - b. Undergoing professional observation and observing experienced teachers.
  - c. Reflecting on own practice and looking for ways they can better deliver quality lessons.
5. The question is also raised around a beginning teacher not meeting 'proficiency' level.

This comment may summarise the situation with beginning teachers:

*“It can be overwhelming to try to get full registration in the first few years of teaching and I don’t think it should be their (beginning teachers) focus anyhow. They need to develop their craft first before providing the evidence or even thinking of it.”*

### **Teachers moving from interstate**

Essentially, there is a general consensus that a national registry of teachers would alleviate problems associated with a teacher moving across borders. At the very least, there should be communication and cooperation between states. This is a significant issue and the following is highlighted:

1. There are inconsistencies in expectations across Australia; the amount and frequency of professional learning, the ability to transfer information,
2. With the onus on the individual teacher maintaining and then providing the required documentation, it becomes a paperwork issue particularly when the teacher has been in a previous casual role.
3. In ‘border’ towns, teachers need to be registered in both jurisdictions thereby doubling the documentation and cost. Professional learning undertaken in one state / territory may not be recognised in another. There is also inconsistency across states / territories in the recognition of teaching qualifications.
4. There is no simple and practical transfer system in place. Registration bodies require submission of teaching qualifications and employment documentation despite a teacher having full registration in previous state / territory. The process can be onerous and time-consuming.
5. ‘Treating’ teachers from interstate as though they are ‘first year graduates’ is demeaning and time-wasting.

The clear message is delivered in these three comments:

*“We are one country. Surely, registration in one jurisdiction could transfer to another. We are using Professional Standards; let’s not make movement between jurisdictions harder than it needs to be.”*

*“Each registration board is a separate entity – a national body might be more preferable.”*

*“Seems ridiculous that we can’t have a system that allows national (teacher) registration.”*

### **Teachers returning from long-term leave**

One of the issues raised in relation to teachers returning from long-term leave is that principals are not always familiar with the expectations particular to this group. Given principals are often the information point in a school, providing current and correct information is critical. Changes to requirements can see considerable time and effort wasted.

Other issues raised in relation to these teachers:

1. Problems experienced in meeting stringent professional learning requirements.
2. Pedagogical, assessment and curriculum changes may necessitate registration bodies providing some sort of bridging program rather than simply completing registration paperwork.
3. Schools have limited capacity to manage returning teachers through registration process.
4. Teachers returning from long-term leave often ‘get behind’ in their professional learning requirements and then experience difficulty in ‘clawing back’ the hours. This is particularly “tough ask on young parents with a child or two at home – they’re already juggling their life.”
5. The lack of flexibility can be an impediment to returning to the profession after extended leave.

### **Overseas teachers**

The view is that overseas teachers face difficulties similar to those experienced by casual teachers and teachers returning from long-term leave. For overseas teachers, the process can prove a long and cumbersome process.

While a one-off, this comment highlights the global nature of the world in which we live and how the teacher registration process may not always recognise this.

*“Having undergone this process, I find it nothing but unsupportive and bureaucratically unwarranted. Some of the expectations do little other than show how disconnected the system is from a global understanding. I was expected to get a police clearance from a country that I lived in 8 years ago. The federal government was able to grant my visa status but the registration board was unable to grant my registration without this document.”*

Other issues raised include:

1. Recognition of overseas qualifications.
2. English language proficiency and cultural understandings.
3. Accessing correct information.
4. Maintaining currency of registration in relation to professional learning.
5. Little or no experience in the process and the difficulty in liaising with previous overseas or Australian schools and then providing evidence and correct documentation.

### **Early childhood educators**

There is considerable confusion around registration of early childhood educators. The essential difficulty arises for those who, employed in a day care centre, are registered by ACECQA as being able to teach 0-4yo children but, crossing the road to the local primary school, are unable to teach in the school's pre-school because teacher registration is not held. Nor will the registration body provide the necessary teacher registration despite holding degree qualifications and having undertaken the level of professional learning necessary for ACECQA recognition.

Further to above, including 0-4yo educators in the registration process and enabling them to move across settings is seen as a way to acknowledge their status as qualified teaching professionals. A university 0-8yrs early childhood course may also provide a clearer pathway to registration in this area.

### **Impact of teacher registration on women in the teaching workforce**

While recognising the family primary carer may be male or female, the point can readily be made that the group most facing difficulties in the registration process is made up predominantly of women. Across a range of circumstances, it is women who have often:

- taken long-term leave to have and raise children;
- moved from one state to another;
- needed to earn a wage in later years because of lower superannuation savings;
- worked part-time or in casual positions to supplement the family income; or,
- returned from overseas following a partner's posting in another country.

It is important that the teacher registration process recognises the myriad circumstances of individuals, values experiences that have led a teacher to re-enter the profession, identifies in a practical way the ability of a teacher to return to the classroom, supports transitioning back into the teaching workforce and welcomes a suitably 'fit and proper' teacher back into the classroom.

### **Improving teacher registration and renewal processes**

Much of the commentary above highlights the broad range of circumstances and issues faced by teachers in getting registered within their state or territory. It was though '**national consistency**' most often mentioned in answers to "What suggestions do you have to improve the teacher registration and renewal processes?"

Discussions by the APPA National Advisory Council and comments provided in the survey, showed that national consistency in qualification and professional learning requirements, and mobility across / portability between states and territories are strongly advocated. Ideally, there is a system of external validation that also supports teacher growth within a school.

Other issues raised were:

- Term of registration
- Cost of registration and renewal
- Complexity, paperwork, red tape and time
- Mentoring

There is also a view the teacher registration process be undertaken at a school or system level and be aligned with mentoring and local performance management procedures. However, this approach would require considerably resourcing at a school level and adds considerably to school leadership responsibilities. It also removes the element of impartiality found in registration being ultimately managed by an external body.

APPA has identified the following structure to achieve a nationally consistent, effective and efficient system of teacher registration and renewal.

1. National registration board governs the teacher registration and renewal process by, for example:
  - a. Identifying what teacher qualifications will be recognised nationally;
  - b. Providing guidelines to state / territory for approving professional learning programs and courses;
  - c. Determining consistent timeframes for teacher registration;
  - d. Holding individual teacher registration documentation.
2. State and territory-based offices of the national board administer teacher registration.
3. State and territory-based offices report to the national board, providing statistical information to allow ongoing refinement of registration processes.
4. The national board provides essential teacher registration information in the form of FAQ and Fact Sheets covering registration matters and, for example, definitions, returning to the profession, renewal, re-registration, etc.
5. Documentation and evidence of practice and professional learning held by the national regulation board are able to be accessed securely by state and territory branches when processing individual teacher registration.
6. The national registration board sets policies and procedures for the following:
  - a. Ongoing review of registration processes;
  - b. Communication advising individual teachers of registration requirements;
  - c. Professional learning requirements;
  - d. Appeals by individuals refused or given 'limited' registration;
  - e. Pre-registration requirements for people beginning initial teacher education courses.

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