



Submission: National Review of Teacher Registration

The IEUA-QNT and the QTU welcome the opportunity to provide feedback regarding the Education Council's National Review of Teacher Registration.

IEUA-QNT represents ~17,000 teachers, support staff and ancillary staff in non-government education institutions in Queensland and the Northern Territory and consistently engages in industrial and education debate at both state and national levels through its Education and Industrial Committees and through its national counterpart, the Independent Education Union of Australia, which receives input from teachers in all States and Territories.

The QTU represents over 45,000 teachers and school leaders in Queensland state primary schools, secondary schools, special schools, senior colleges, TAFE colleges and other educational facilities and has a strong history of working with education stakeholders on matters that affect its members.

The QTU and IEUA-QNT are making a collaborative submission to this review because our interests and concerns on registration matters are largely identical.

Our unions also share significant concern regarding the review consultation process. The timelines for the review, published on the AITSL website, indicate that the Consultation Paper was to be available for the period March to April, but we note that it was not made available until the last week of March.

Further, the published timelines state that consultation would occur between March and April, but the opportunity for Queensland teachers to engage in face-to-face consultations is scheduled after submissions are due.

Our responses to each of the focus questions from the Consultation Paper are provided below.

How well are the implementation and content of the eight elements of the Framework working?

1. The eight elements of the framework provide a consistent scaffold for teacher registration bodies in all jurisdictions, while allowing each jurisdiction to retain its own policies and practices.
2. Our unions note however, that successful transition from provisional to full registration requires beginning teachers to be granted access to a quality induction program and release time to participate in mentoring programs and that some employers are more likely to provide these opportunities than others.
3. Our unions have significant concerns relating to the provisions for alternative authorisation to teach. In particular, we are concerned by existing provisions in some jurisdictions that allow pre-service teachers enrolled in short-term, intensive ('fast track') teacher preparation programs to teach in schools. Our unions are opposed to short-term teacher preparation programs as we believe that allowing inadequately qualified individuals to teach undermines the profession.

4. We strongly oppose any lowering of the minimum qualification requirement for registration. This should remain as at least four years of higher education, including completion of an initial teacher education program accredited in Australia, or an overseas qualification assessed as equivalent by the relevant teacher registration authority.

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?

5. Notwithstanding shortcomings of the Australian Professional Standards for Teachers (APST), their use in tracking teachers' progression from provisional to full registration is now entrenched practice in all jurisdictions.
6. Our unions believe it is helpful for teachers to have clear specifications as to how their practice should change in moving from the Graduate to Proficient levels and that it is appropriate for those changes in practice to be aligned with the transition from provisional to full registration.
7. Similarly, the link between the APST and renewal of registration is also well established in most jurisdictions, with practising teachers required to record, for example, how their engagement with continuing professional development (CPD) relates to the Focus Areas of the APST.
8. While there is, arguably, some scope for refinement of the APST, our unions support their continued use in these contexts.

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?

9. As indicated above, our unions are satisfied that use of the APST as a point of reference for both transition from provisional to full registration and renewal of registration for teachers at the Proficient level is well established in most jurisdictions.
10. The eight elements of the Framework for National Teacher Registration are relevant and appropriate, but we are concerned that this review foreshadows Commonwealth takeover of states' jurisdictional matters. Any recommendations arising from the review will need to be referred to teacher registration authorities for consideration in the context of existing workload and budgetary constraints.
11. We are also concerned that the implementation of recommendations arising from this review will be an additional cost to the Commonwealth Government, which employs no teachers and runs no schools. We assert that any recommendation arising from the review that are tied to Commonwealth funding of schools is a misuse of the powers of section 96 of the Constitution.
12. Moreover, we reject any proposal for AITSL, or any other national body, to seek to impose fees on teachers, or institutional levies on teacher registration authorities.

How could improvements be implemented, acknowledging different legislative, regulatory, administrative and resourcing contexts? What are some expected benefits and success measures?

13. It is essential that any Framework for National Teacher Registration be sufficiently flexible to allow each jurisdiction to operate within its own regulatory, administrative and resourcing contexts.
14. There is, however, scope for improvement in processes for mutual recognition. Our unions have, for example, been contacted by members wishing to teach in multiple jurisdictions and we note a degree of dissatisfaction with the fact that this requires the teacher to apply, and pay, for registration in each jurisdiction. Our unions therefore support mutual recognition processes that support easier movement of teachers across state and territory borders, but we do not support any process that would diminish minimal registration requirements or the standards of the teaching profession.

Should nationally consistent approaches to the registration of early childhood education teachers be considered?

15. Our unions are in favour of a nationally consistent approach to the registration of early childhood education teachers.
16. In providing for registration of early childhood teachers, it is important that the definition of a teacher be tied to their level of qualification. In Queensland, for example, the minimum qualification for teacher registration is four years of tertiary education (either a four year Education degree or a three year undergraduate degree in a field related to the area of teaching, plus a postgraduate qualification in Education). This minimum standard must be preserved to protect the integrity of the profession.

How could a nationally consistent approach to teacher registration support and improve the quality of early childhood teaching in school and non-school settings?

17. Given the importance of quality early childhood education to children's life outcomes, it is important that qualified and registered teachers working within the early childhood sector are bound to professional standards equivalent to those demanded of teachers in schools.
18. A nationally consistent approach to registration of teachers working in early childhood settings would, therefore, benefit the profession.
19. It is however, important to note that teachers working in non-school settings can face considerable challenges in meeting professional standards, particularly when they are the only registered teacher on staff. In this context, there is a clear need for schemata to provide support and resources to assist these teachers in meeting and maintaining the requirements of registration.

20. Some jurisdictions have pre-existing programs designed to support early childhood teachers in non-school settings and these could be expanded or adapted to apply in a national context.

How could the Teacher Standards be applied for early childhood teacher registration?

21. It is important to note that the language used in the Australian Professional Standards for Teachers (APST) is sometimes inconsistent with policy and practice in early childhood settings.
22. Several jurisdictions have already commenced work on resources to help teachers in early childhood settings engage with the APST. The Queensland College of Teachers, for example, has produced an Evidence Guide to assist early childhood teachers in gathering and annotating evidence of teaching practice, as required for registration purposes. The Evidence Guide includes a glossary which matches terms used in the APST to the language used in early childhood settings and also maps the APST to the Quality Areas. Such resources could be readily adapted for use in other jurisdictions.
23. A significant challenge in registration of early childhood teachers however is accessibility of reviewers who are able to review evidence of practice and make recommendations regarding, for example, transition from provisional to full registration. This is because, in many cases, early childhood teachers may be the only qualified teacher working at a particular kindergarten or childcare service. In this context, support for early childhood teachers should include assistance in locating an appropriate reviewer.

Under current teacher registration processes, what are the specific challenges to delivery of VET in schools for:

- a) Registered teachers
- b) VET trainers and assessors

How could these be overcome?

24. In practice, schools adopt a variety of approaches to VET. Some schools invest heavily in school-based programs (e.g. Trade Training Centres, setting up cafes or hairdressing salons on-site that can be used for student training purposes), while others rely either extensively, or occasionally, on external providers including both public (eg TAFE) and private RTOs.
25. Reports from members of our unions indicate that, for schools that invest in school-based VET programmes (VETiS), compliance with regulatory frameworks, such as maintaining industry experience, is a significant burden on teachers, many of whom also teach traditional classroom subjects.
26. Additional concerns that need to be addressed as a matter of urgency include investment of time expended undertaking internal reviews of courses and supervision of industry placements.

27. It remains important that VET programs delivered in schools are delivered by teachers who meet minimum registration requirements.

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?

28. Schools already have the capacity to engage external VET providers to deliver training to students.
29. Reports from members indicate that diminished government support for public providers has had a substantial impact. Withdrawal of government-supported TAFE programmes has led to a reduction in the number of school-based students accessing VET programmes, particularly in rural and regional areas and urban areas where local TAFE facilities have been closed.
30. Overreliance on private VET providers has also generated pressure to lower standards, reduce mandated training hours and inflate results; leading to an erosion of both quality of VET and public confidence in the VET sector.
31. One possible mechanism to support maintenance of quality standards and national consistency in relation to VET would be to establish a federally funded training ombudsman; noting that Queensland's appointment of a state training ombudsman has greatly assisted in resolution of state issues.
32. An additional mechanism for enhancing quality of VET would be to introduce a system of registration for trainers and assessors. Such a system would convey a level of professional standing commensurate with aspirations for the sector. In this context, it is also worth noting that Queensland has recently developed Professional Standards for Vocational Education and Training Practitioners, which could be readily adapted for use in a national context.
33. While our unions believe that industry can make a worthwhile contribution to the implementation of VETiS, we reject commercial arrangements that exploit students by disguising work in unpaid roles as training opportunities. We believe that teachers, not industry, should lead the development and design of VETiS.

How do current teacher registration processes support graduates:

- a) Seeking provisional registration**
b) Employed in different circumstances (e.g. casual, full-time or permanent)?

34. As the APST have been embedded into initial teacher education programmes since 2012, graduating teachers are well informed about the requirement to map their practice to the 37 focus areas in order to meet the requirements of registration.
35. We also believe that universities generally provide good support for pre-service teachers developing portfolios of evidence demonstrating practice at the Graduate level.

36. Linking the transition from provisional to full registration to the APST has provided beginning teachers with clear guidance as to how their practice should change in the movement from Graduate to Proficient levels of practice.
37. Similarly, where beginning teachers transition from study to permanent or longer-term contracts of service, employers are increasingly likely to provide the induction, support and mentoring required to transition to higher levels of practice. Principals in small schools, particularly in regional and remote locations that have a high number of early career teachers, have expressed concerns around capacity of schools to adequately meet the mentoring and support needs of early career teachers, and time taken to complete documentation.
38. There remains however, two areas where support for beginning teachers could be further developed:
- a) Where beginning teachers transition from study to work in early childhood settings, they may often be the only qualified and registered teacher on staff, making it difficult for them to access quality mentoring and support that can guide them in their transition to full registration. In this context, our unions support initiatives to provide greater access to professional networks for early childhood teachers.
 - b) Where beginning teachers transition from study to casual/supply work and/or short-term contracts, the schools where they work do not always provide adequate access to mentoring and professional development and the beginning teacher may struggle to meet the requirements for transition from provisional to full registration.
39. In this context, our unions support measures that maximise permanent employment and would argue that there is a need for clarification around minimum standards or levels of support provided to graduate teachers.

Are there barriers/challenges presented by teacher registration for those entering the teaching profession? How could these be overcome?

40. Our unions strongly oppose any weakening of minimal qualification requirements. Given the emphasis placed on teacher quality by governments, media outlets and the general public it is essential that those practising the profession be adequately trained prior to being given responsibility for the education of children and young people.
41. We recognise that some provision for alternative authorisations to teach may be required in, for example, hard to staff areas, but we are concerned that, in some jurisdictions, fundamental qualification requirements are being undermined by provisions that allow pre-service teachers enrolled in short-term, intensive ('fast track') teacher preparation programs to teach in schools.
42. In relation to alternative authorisations to teach, our unions believe that these should be granted for a particular position for a specified period of time and having permission to teach at one school should not automatically allow the person to teach in another school.
43. We are also concerned that this Review foreshadows Constitutional overreach and would caution that any recommendations arising from the review need to be considered in light of the fact that AITSL is a federal bureaucracy that has no teacher representation on its Board and its sole shareholder (the Federal Minister for Education) employs no teachers and runs no schools.

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?

44. To work effectively and efficiently, any system of pre-registration would be required to be administered by the teacher registration authority, rather than, for example, operating via the various bodies responsible for administration of working with children checks.
45. While a system of pre-registration would potentially streamline the transition from pre-service to in-service teachers, processing applications for pre-registration would impose a significant burden on the jurisdictional teacher registration authorities and would, therefore, require additional staffing and/or resources. Given that the responsibility for providing additional staff/resources would rest with the jurisdictional authorities, the only mechanism for funding would be for pre-service teachers to pay a pre-registration fee and our unions strongly oppose imposition of such a scheme.
46. Our unions are opposed to implementation of an alternative, national pre-registration scheme as this would undermine the authority and functions of the jurisdictional authorities.

How do regulatory authorities (within legislated responsibility) ensure the fit and proper person requirement of registered teachers?

47. Within each jurisdiction, the relevant teacher registration authority is required by legislation to exercise its discretion against the tests set out in the relevant Teacher Registration Act. Each authority must have regards to the tests set out in those Acts, rather than tests in other Acts (e.g. Care and Protections of Children Act in the Northern Territory).
48. Given that each teacher registration authority is established as a separate body, specific to teaching professionals, it is appropriate that each authority maintain its special position and not have its authority diluted by deferring to decisions of other organisations.
49. Teachers conduct their duties in unique professional circumstances. They work within sophisticated statutory and school frameworks. Teachers' working conditions are substantially different from those who hold more simplistic working with children clearances, who may be self-employed and may work predominantly alone. Those who hold only working with children clearances may perform their work without any professional overlay and may hold no qualifications for their work (except experience in the field, e.g. football coaches).
50. The establishment of the teacher registration authorities as separate decision making bodies recognises these unique circumstances and must be maintained as separate from both those bodies responsible for administration of working with children checks and any national body such as AITSL.

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?

51. As noted above, within each jurisdiction, the relevant teacher registration authorities are required by legislation to exercise their discretion against the tests set out in the relevant Teacher Registration Acts and are responsible for regulation of the profession.
52. Most registration authorities have well-developed protocols and procedures for investigation of complaints against teachers and the penalties which can be imposed on those who fail to meet the standards required of the profession.
53. While some harmonisation of legislation across jurisdictions would be helpful in establishing a nationally consistent approach, it is also important to preserve the independence of each teacher registration authority.

We thank the Education Council and AITSL for the invitation to engage in consultation through this submission and would welcome the opportunity to engage in further discussion.



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