



## Queensland Catholic Education Commission

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# Response to the National Review of Teacher Registration

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## Introduction

The Queensland Catholic Education Commission (QCEC) welcomes the opportunity to provide a submission on the National Review of Teacher Registration conducted by the National Teacher Registration Review Expert Panel.

QCEC is the peak strategic body with state-wide responsibilities for Catholic schooling in Queensland. This submission is provided on behalf of the five Diocesan Catholic School Authorities and 17 Religious Institutes and other incorporated bodies which, between them, operate a total of 304 Catholic schools that employ over 11,400 teachers and educate more than 147,000 students in Queensland. This response has been informed by responses from a number of those Catholic School Authorities, for whom issues of teacher employment and teacher registration impact more significantly.

QCEC is committed to providing high quality education, delivered by high-calibre teachers, for children and young people in school and kindergarten settings. Teacher registration is recognised and supported by QCEC as an important mechanism to ensure the quality of the teacher workforce.

This submission responds to the questions set out in the *Areas for Discussion* section of the National Review of Teacher Registration Consultation Paper. Whilst the focus questions in the Consultation Paper are acknowledged, QCEC encountered significant overlap in trying to respond individually to each of those questions and has hence melded some focus areas. The response is formed from a largely Queensland perspective and it should be noted that this state has had compulsory teacher registration for over 30 years, thus processes of teacher registration are well entrenched and supported. The Queensland College of Teachers (the body responsible for teacher registration) is a well-respected body with well-established processes in place around registration.

## National Review of Teacher Registration

### Areas for discussion

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

It is difficult to ascertain how well the national teacher registration framework is working across the nation. The current *Education (Queensland College of Teachers) Act 2005* (updated as at January 2018)

does not show overt influences from the framework since its inception. That stated, the eight elements of the teacher registration framework do align with established processes for teacher registration in Queensland. Those elements, and the overarching Australian Professional Standards for Teachers, are supported by QCEC as relevant and appropriate to guide registration processes across the state and territory jurisdictions.

QCEC notes however, that there is currently significant variation in the application of the eight elements of the framework across jurisdictions: in the evidence required; processes undertaken and reviewer judgements. Examples of variations cited across different jurisdictions include requirements for length of time teaching before eligibility to progress to full registration and steps required to renew registration. A move to harmonisation of these requirements across states and territories will be essential to full national registration recognition and seamless transition.

The discussion document describes mutual recognition as allow(ing) a person who is registered to practise as a teacher in one jurisdiction to be registered in another jurisdiction based on that registration. QCEC is highly supportive of the concept of transportability of teacher registration across jurisdictions within minimum bureaucratic requirement and duplication of processes for teachers. The concept of a teaching passport has been discussed and is supported in principle. Recent research (Jha and Ryan, 2017) indicates that teacher mobility across Australia is approximately 15%. To facilitate this growing mobility and enable full and fast portability of teacher registration, jurisdictions will need to be confident that the quality criteria and requirements for registration in their state or territory are matched by those of other states and territories. QCEC recommends that this consistency is essential to progressing a national registration framework that offers minimum hurdles and maximum quality assurance to those moving between jurisdictions.

### **1. Elements of registration**

As indicated in the foregoing, the eight elements of the Framework are supported by QCEC but any consistent application of the element, or processes surrounding each element, is highly aspirational at this point. The following points are noted:

- I. Initial period of registration: Significant variation exists across jurisdictions in terms of minimum teaching time requirements before a teacher can move from provisional to full registration. This variation is inequitable but could also serve to undermine confidence in the experience level of newly fully registered teachers from those states where the required experience is significantly reduced. Provisional service requirement of 80 days in Victoria is in strong contrast to that of 200 days in Queensland.
  - Some Catholic School Authorities point anecdotally to prevailing practices in some sectors and jurisdictions to use shorter term contract employment arrangements that reduce opportunity for continuity of practice and accumulation of appropriate time served for full registration.
  - The possible budgetary advantages of keeping a teacher at provisional registration level for a longer period are also noted.
  - Nonetheless the capacity to extend the provisional registration period where a teacher has not reached an appropriate level for full registration is highly supported.
  - There is no evident consistency in the processes and quality criteria applied in signing off a teacher as suitable for full registration. While the Australian Professional Standards for Teachers provide standards against which to make judgments, it is not clear that these standards are thoroughly entrenched in final decision making across all schools and jurisdictions.

At best practice, teachers are progressed from provisional to full registration using rigorous consideration of their teaching standard against the Australian Professional Standards for Teachers from Graduate to Proficient standard. It was noted by one Catholic School Authority that “The Initial Period of Registration functions well, through the teacher’s professional learning and support given by mentors such as teaching colleagues and college leadership”. This was noted as a tangible and continuous process for provisionally registered teachers throughout their 200 days of classroom experience prior to applying for full registration, with evidence requirements clearly explicated by Queensland College of Teachers. This Catholic School Authority highlighted that the engagement with the standards is done consistently in the College under the guidance of senior leadership.

The overarching challenge is to make this practice the norm in all circumstances. QCEC suggests consideration be given to the development of nationally consistent toolkits for use by assessors of teachers against the proficient standards to assist this process. Specific exemplars of expectations such as regular in-class engagement and support by the mentor throughout the provisional period could be provided. Challenges are reported in some areas, especially very small and remote schools and kindergarten settings where staff numbers are limited, in getting appropriately experienced teachers to mentor beginning teachers, and creative access to mentoring and support opportunities across the nation might be considered as part of this review.

## **II. Fixed period of registration**

The Australian Professional Standards for Teachers, both as stand-alone standards and as standards overarching Teacher Registration Framework are welcomed by QCEC as a positive contribution to articulating and understanding quality teaching. Catholic School Authorities propose that embedding the Teacher Standards in the Framework provides a common language and consistent basis for making judgements about teacher quality. The standards are noted as particularly useful in aiding decision making in the transition of teachers from provisional to full registration (or from Graduate to Proficient). Beyond that, and work around certification of Highly Accomplished and Lead Teacher, anecdotal evidence suggests that the use of the standards has not fully penetrated school and system practice. Certainly, the standards have not impacted on registration processes beyond the graduate to proficient level.

At best practice, Catholic School Authorities indicate that teachers at full registration reflect on the standards (APST) within their professional learning and development plan and engage with the AITSL self-assessment tool in goal setting, collecting evidence and sharing practice. This is an employer requirement however, that goes beyond the current professional learning time compliance requirements for continued registration.

The standards are being increasingly recorded on Professional Learning (PL) documentation and are being used as one indicator of suitability of Professional Learning offerings. Maintenance of Queensland teacher registration requires that teachers complete a minimum of 20 hours of Professional Learning per year (or 100 hours over 5 years). While facilities are in place to record that professional learning and a teacher’s professional learning hours can be audited by QCT, practices around authorisation and validity of professional learning, demonstrated outcomes of professional learning in terms of teacher classroom practice, and alignment of professional learning with the needs of the school and its students do not adequately leverage off the potential of the standards to improve teacher quality for registration purposes. The focus for registration purposes is primarily on compliance with the time requirement. There is not clear evidence that the current teacher registration renewal process per se drives ongoing

improvement beyond the proficient standard. Evidence of good practice as cited above does indicate that the standards and the professional learning requirements can be drawn on by schools to strengthen quality teaching, but that leverage is not provided in current registration processes.

It is recommended that in forging a national teacher registration process, consideration be given to further focus on the demonstrable outcomes and impact of professional learning in improving teaching quality. Consideration might be given to quality assuring professional learning: align PL offerings with the APST and record, even by teacher reflection, impacts of Professional Learning on teaching and learning.

### **Teacher quality**

The Australian Professional Standards for Teachers (APST) provide teachers with explicit statements on what constitutes teacher quality and the standards can be excellent guides for teachers in considering their practice. It is not clear that the standards have penetrated yet to all teachers, schools and systems, although the use of the standards in relation to progression from provisional to full (graduate to proficient) level registration and in the certification of highly accomplished and lead teachers is evident. The standards do have greater potential to impact on teaching quality but need to be absorbed into regular practice.

QCEC recommends that resources to aid communication and understanding of the standards could be useful in promoting their use.

### **Improvements**

QCEC recognises the complexities of a federalist system, inter-government relationships, and political and teacher union perspectives in seeking to progress this national framework but is heartened that the Ministerial Council and all Ministers have agreed to this progress. While QCEC would support in principle attempts to fast-track progress towards national registration, acknowledging different legislative, regulatory, administrative and resourcing contexts, QCEC would recommend an initial move to harmonise existing registration processes and requirements across Australia. QCEC does not believe that is necessary to form one centralised national body to progress this work, but rather recommends that existing teacher registration authorities adopt a common and unified approach to teacher registration. Teachers in Queensland appreciate that the Queensland College of Teachers is a body highly representative of Queensland teachers, and it is anticipated that there would be concern if the current close connection to the state registration authority is lost.

It is a vexed issue as to how teacher registration processes might be used to further strengthen teacher quality. Currently in Queensland, registration provides a base level quality assurance that teachers have undergone the required level of pre-service teacher education, that they are fit and proper persons to teach and, with the progression from provisional to full registration, that they are proficient teachers. Registration renewal offers little in terms of quality improvement beyond a 20-hour time requirement for attendance at professional learning, that is largely not consistently quality assured or recorded in terms of quality outcomes or impact.

As highlighted above, QCEC recommends that consideration be given to further focus on the outcomes and impact of professional learning (required as part of registration renewal) in improving teaching quality. The opportunity is currently being missed to explicitly link professional learning to quality teaching.

At some point, future consideration might be given to the possibilities of registering teachers at different levels, in accordance with those utilised in the Australian Professional standards for Teachers: Graduate; Proficient; Highly Accomplished and Lead status. QCEC would approach such proposals with some caution. QCEC is currently implementing Highly Accomplished and Lead Teacher Certification but is conscious of the very small numbers of certified teachers across Australia. At this point, it would appear challenging to redesign teacher registration systems to capture this professional recognition.

## **2. Should early childhood teachers be part of a national approach to teacher registration?**

Registration is not compulsory in Queensland for early childhood teachers working in early childhood services. However, any teacher employed in a school, Prep to Year 3, in Queensland is required to be registered with the Queensland College of Teachers (QCT).

Catholic School Authorities suggest that including early childhood teachers in a national approach to registration should benefit both teachers and student outcomes. The ongoing teacher registration requirements of providing evidence of practice against the Teacher Standards should enhance and support consistency of teacher quality. It was recommended that application of Teacher Standards for early childhood teachers be flexible in order to reflect location and context. Further, the application of teacher registration processes could ensure regulation of qualifications and ongoing currency for early childhood teaching.

Currently all early childhood teachers employed in standalone Catholic kindergartens are registered with QCT. Delegated Catholic agencies, that manage and operate kindergartens, believe it is imperative that early childhood teachers employed in non-school settings are registered so that four-year qualified early childhood teachers working in these settings are viewed through the same professional lens as all other teachers.

To help raise the value of early childhood education and the professionalism of early childhood teachers across the nation it would be an advantage for consistent approaches to be implemented across jurisdictions.

A nationally consistent approach to teacher registration would help to improve the quality of early childhood teaching as regardless of where a teacher is employed across the nation they will be aligning their professional practices and learning with the Australian Professional Standards for Teachers. This consistent approach would raise the value of learning in the early years within the teaching profession and wider community.

The Queensland College of Teachers (QCT) has developed a document to support early childhood teachers to transition to full registration. [Transition to full registration: An evidence guide for early childhood teachers](#) is used by provisionally registered early childhood teachers to assist their evidence collection and annotation. The Guide helps early childhood teachers to address each Standard to move from provisional to full registration by using language and examples that are appropriate and relevant in early childhood settings. Currently the language of the Australian Professional Standards for Teachers is not inclusive of early childhood settings/ contexts. However there does not need to be different standards developed for early childhood teachers – as it is important that early childhood teachers adhere to the same professional standards as all other registered teachers.

There are challenges for some early childhood teachers in moving from provisional to full registration, i.e. by demonstrating evidence of performing at the Proficient stage, due to the requirement for them to be supported by an experienced fully registered early childhood teacher. In some locations (rural and remote) and contexts (standalone kindergartens) there are limited options available for them to access mentoring, observation and professional learning. Delegated Catholic agencies have addressed these challenges by developing mentoring, coaching and regular communication channels and partnerships with suitably qualified registered teachers in neighbouring Catholic schools and diocesan Catholic education offices.

### **3. What role does teacher registration play for VET teachers in school settings?**

QCEC is committed to teacher registration processes that support and continuously improve a quality teaching workforce. Vocational Education and Training (VET) is a valid and valuable pathway for students and the delivery of VET in schools in Queensland is monitored and regulated by the Australian Skills Quality Authority (ASQA), generally under the auspices of the Queensland Curriculum and Assessment Authority, although some schools operate as stand-alone Registered Training Organisations. Catholic secondary schools offer VET in schools to students, either as a Registered Training Organisation (RTO) with the Queensland Curriculum and Assessment Authority (QCAA) or through agreement/partnership with external RTOs. QCAA has delegated authority from ASQA to monitor and regulate school RTOs. RTO operations, including trainers and assessors, are monitored and audited against the Standards for Registered Training Organisations (RTO) 2015.

Vocational Education and Training in Queensland Catholic secondary schools is not embedded in QCAA developed or approved vocational learning syllabuses. VET offered in schools is selected from the Australian Government's National Register of VET.

VET delivered in Queensland secondary schools is provided by trainers and assessors through a number of options approved by the Queensland College of Teachers (QCT):

1. Registered teachers with the Queensland College of Teachers (QCT) are the trainers and assessors.
2. Industry trainers and assessors who hold Permission to Teach (PTT) with the QCT and are therefore considered to be carrying out teaching duties. There is a limit of 2 years for a PTT, a renewal of the PTT is dependent on application and approval by QCT. This is a pathway to registration as noted in the Alternative authorisation to teach element of the Framework for National Teacher Registration.
3. Industry trainers and assessors who are considered by QCT to be delivering VET as a co-curricular or extra-curricular program and as such not carrying out teacher duties are not required to have teacher registration.

Trainers and assessors delivering VET in schools must meet the requirements named in the Standards for Registered Training Organisations (RTO) 2015. These requirements include qualifications in training and assessment, vocational competencies at least to the level being delivered and currency of industry experience

Option 1 VET delivery:

Registered teachers delivering VET in Queensland schools must also comply with the requirements for trainers and assessors. The training and assessment qualification required supports the competency-based approach for VET, which is an additional qualification teachers need in order to deliver VET in

schools. Resourcing teachers to acquire training and assessment qualifications includes funding, time and access to approved providers, and these can pose challenges for Catholic schools. Even if schools have teachers with training and assessment qualifications, schools can face challenges in terms of access to teachers with the specific VET qualifications and currency of industry experience to deliver the VET qualification in schools, which also requires funding, time and industry access. This can limit the VET offerings for students and is considered a particular concern for remote and regional schools.

#### Option 2 VET delivery:

Catholic School Authorities indicated that while they have industry trainers and assessors who also undertake teaching qualifications and registration, there are also many who do not wish to undertake this study. This then also limits schools in their VET offerings for delivery in schools, as over time changes in employment patterns and technology can impact on what VET should be offered and it is important for schools to have the flexibility to change VET offerings in school. Therefore, there is an advantage to schools being able to access people with industry qualifications and currency of experience to deliver VET in school that meets industry demand and growth.

#### Option 3 VET delivery:

VET delivered in schools is a valuable part of a school's education program and as such it is a concern if it is considered as 'extra' in order to have non-teachers delivering. This approach is thus less favoured by schools.

While it is important to ensure quality and consistent teacher registration processes are not compromised it is also important to appreciate the qualifications and requirements mandated for delivery of VET and ensure the validity of VET delivered in schools as a quality component of a school's education program.

Therefore, it is recommended that while the option for registered teachers with the additional qualifications to deliver VET in schools is worthwhile, schools should not be limited in their capacity to offer VET by a requirement that only registered teachers or trainers and assessors with Permission to Teach are able to deliver VET as part of the school's education program.

One Catholic School Authority recommended that qualified VET trainers and assessors without teacher qualifications could operate as supervised co-teachers in schools, although this reflects a current operational practice in many schools already and has little implication for registration as such. A similar operational proposal was for a registered teacher to retain their regular teaching responsibilities for the VET program in school and access industry trainers and assessors as a skilled resource to support the training and assessing. The engagement of trainers and assessors from within industry could also enhance and encourage school and industry partnerships.

#### **4. How does teacher registration support entry into the teaching profession?**

The Professional Standards at the Graduate career stage form the basis for the accreditation of Initial Teacher Education (ITE) programs. Catholic School Authorities acknowledged that the accreditation of ITE programs, including the requirement of a common teaching performance assessment, are beginning to improve consistency between jurisdictions regarding entry into the teaching profession.

The Professional Standards at the Graduate career stage are considered to provide clear direction and process to support graduates as they seek provisional registration. However, it was noted that

university ITE courses vary in their engagement with the Professional Standards. A more consistent approach to the level of engagement with these standards across tertiary providers of initial teacher education courses is recommended.

It was suggested that the Professional Standards at the Graduate career stage also provide a common platform to inform determination of selection criteria for recruitment processes. Recruitment processes and employment practices for graduate teachers can impact on their capacity to achieve full registration. Examples were provided of graduates employed in casual or short-term contract positions who may have difficulty in forming a consistent relationship with an assessor who can confidently, validly and reliably sign off on competencies against the Professional Standards at the Proficient career stage. As noted earlier in this submission, concerns about inequities were raised in relation to the variations in registration requirements across jurisdictions especially in the minimum time of teaching experience required for graduates to be eligible to seek full registration.

There were some challenges identified by Catholic School Authorities in teacher registration processes. One of these challenges was the employing authority's ability to provide appropriate resources for the graduate teacher to gather evidence and demonstrate the relevant standards at the Proficient career stage. Variations in processes and reviewer judgements across school sites and jurisdictions also pose a challenge to how validly and equitably the teacher registration process supports graduates. It was recommended that nationally consistent resources be developed to help facilitate validity and reliability of judgment against standards at the Proficient career stage.

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

To teach in a Queensland Catholic school a person must be registered with the Queensland College of Teachers (QCT). Registered teachers must satisfy the fit and proper person requirement in Queensland by satisfying the QCT eligibility requirement of Suitability to Teach. QCT assesses the initial application for registration as a teacher or for permission to teach by examining the applicant's conduct which includes police information, any previous disciplinary action or reasons for termination of employment. Registered teachers with full registration will have these checks carried out every 5 years as part of renewal of registration.

QCT processes seem clear and rigorous. QCT will disclose information to the applicant before using the information to decide if a person is suitable to teach in Queensland. QCT also provides list of teachers with registrations suspended to relevant authorities and makes a list of current teacher registrations easily accessible to employing authorities.

There are a number of legislation requirements and procedures to satisfy to be considered a fit and proper person within Queensland. There are however different legislation requirements and procedures in other jurisdictions. Harmonising legislation, particularly in relation to child protection requirements at State and National level, could provide more clear and concise requirements and support a nationally consistent approach. This could also increase confidence in mutual recognition and enable a simpler process for registered teachers in one jurisdiction seeking to work in another.

National requirements for fit and proper person test that include use of common language and consistency of processes and evidence required could enable a consistent national approach. This



national approach should be required for applications for teacher registration and renewal of teacher registration to ensure confidence in the suitability of teachers to teach across Australia.

In relation to registration of pre-service teacher education students, QCEC views the issue with some interest but caution. It is suggested that before this issue is progressed, a careful explication of the advantages and disadvantages of pre-service teacher education registration should be developed.

The pre-service teacher registration might provide useful information about work force projections, comparative attrition and graduation rates from various institutes and other issues to inform government policy. From an individual pre-service teacher perspective, it would be important to investigate the perceived benefits of registration and its attendant costs with that group. Access to resources is sometimes quoted in support of this move but greater clarity is sought on how registration enables this access. Pre-service teacher registration might be considered as a measure of a fit and proper person to teach prior to students undertaking a course but it appears a very blunt instrument for that purpose and that element would appear to be better incorporated into overarching course entry requirements.

QCEC would welcome further investigation into this area.

### **Conclusion**

QCEC welcomes the opportunity to provide response to the questions posed in each of the areas for discussion within the paper on the National Review of Teacher Registration conducted by the National Teacher Registration Review Expert Panel. QCEC will be pleased to discuss any of the responses further. Please contact [REDACTED] [REDACTED] [REDACTED]

A handwritten signature in black ink, appearing to read 'Lee-Anne Perry', with a large, stylized flourish at the end.

**Dr Lee-Anne Perry AM**  
Executive Director